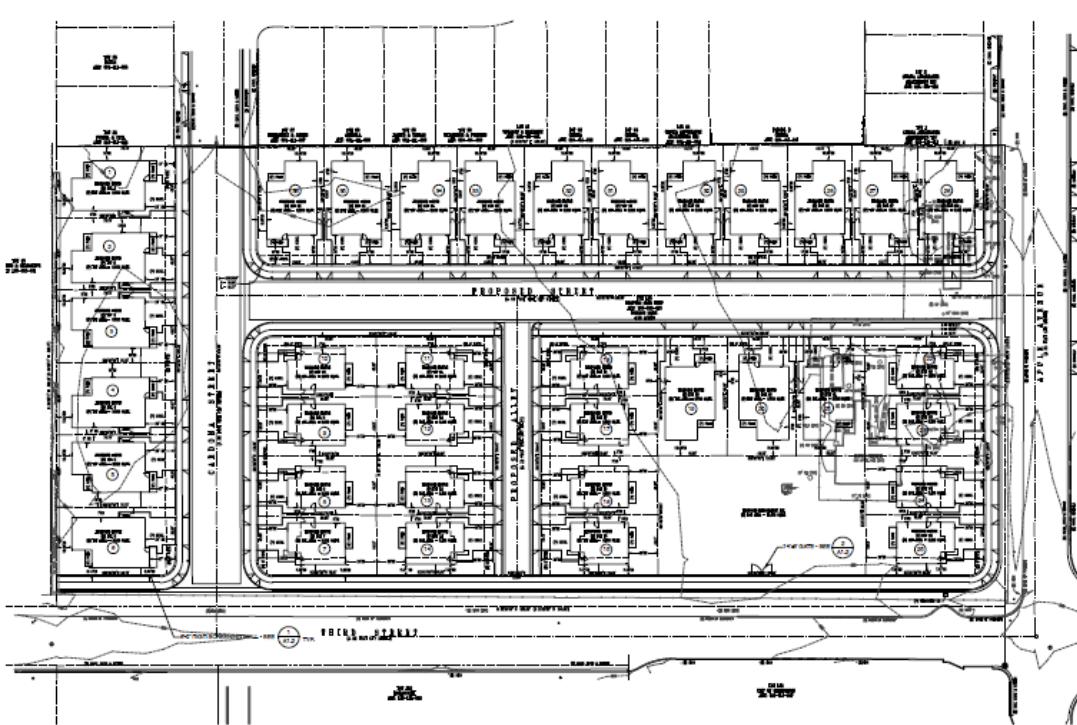


Draft Mitigated Negative Declaration

Apple Avenue Subdivision

City of Greenfield

January 2023



Prepared by
EMC Planning Group

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

In compliance with the California Environmental Quality Act (CEQA), City of Greenfield has undertaken environmental review for the proposed Apple Avenue Subdivision located at 296 Apple Avenue and intends to adopt a Mitigated Negative Declaration. The City of Greenfield invites all interested persons and agencies to comment on the proposed Apple Avenue Subdivision.

Lead Agency: City of Greenfield

Project Location: 296 Apple Avenue

Project Description: The proposed project includes a Vesting Tentative Map and Planned Development to subdivide the approximately 4.6-acre property and construct 36 detached single-family residences and a 37th lot for an 11,279-square foot detention basin. The proposed project also involves new public rights-of-way with Cardona Circle extending from the adjacent subdivision through the project site to 3rd Street at 56 feet wide and a new public right-of-way extending from Apple Avenue to intersect with Cardona Circle at 49 feet wide. In addition, a new 32-foot-wide alley off the new public right-of-way will serve the homes along this alley extending to 3rd Street where users would be protected by bollards.

Public Review Period: Begins– February 8, 2023
Ends – March 10, 2023

Proposed Mitigated Negative Declaration is Available for Public Review at these Locations: Community Development Department: 599 El Camino Real, Greenfield
Greenfield Branch Library: 315 El Camino Real, Greenfield
<https://ci.greenfield.ca.us/482/296-Initial-Study-IS-Mitigated-Negative->

Address Where Written Comments May be Sent: Rob Mullane, AICP, Consulting Planner
City of Greenfield
599 El Camino Real
Greenfield, CA 93927
rmullane@hrandassociates.org

Public Hearings: **Planning Commission (recommendation on project and MND)**
Date: Tuesday, March 7, 2023
Time: 6:00 pm
Location: City Council Chambers, 599 El Camino Real, Greenfield, CA
or via Zoom (check Planning Commission agenda for Zoom link)

City Council (action on project and MND)

Date: Tuesday, March 28, 2023
Time: 6:00 pm
Location: City Council Chambers, 599 El Camino Real, Greenfield, CA
or via Zoom (check City Council agenda for Zoom link)

DRAFT MITIGATED NEGATIVE DECLARATION

APPLE AVENUE SUBDIVISION

CITY OF GREENFIELD

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PREPARED BY
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January 2023

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MITIGATED NEGATIVE DECLARATION

In Compliance with the California Environmental Quality Act (CEQA)

Project Name	Apple Avenue Subdivision
Lead Agency	City of Greenfield
Project Proponent	People’s Self-Help Housing Corporation
Project Location	296 Apple Avenue, Greenfield
Project Description	The proposed project includes a Vesting Tentative Map and Planned Development to subdivide the approximately 4.6-acre property and construct 36 detached single-family residences and a 37th lot for an 11,279-square foot detention basin. The proposed project also involves new public rights-of-way with Cardona Circle extending from the adjacent subdivision through the project site to 3rd Street at 56 feet wide and a new public right-of-way extending from Apple Avenue to intersect with Cardona Circle at 49 feet wide. In addition, a new 32-foot-wide alley off the new public right-of-way will serve the homes along this alley extending to 3rd Street where users would be protected by bollards.
Public Review Period	February 8, 2023 to March 10, 2023
Written Comments To	Rob Mullane, AICP, Consulting Planner City of Greenfield 599 El Camino Real Greenfield, CA 93927
Proposed Findings	<p>The City of Greenfield is the custodian of the documents and other material that constitute the record of proceedings upon which this decision is based.</p> <p>The initial study indicates that the proposed project has the potential to result in significant adverse environmental impacts. However, the mitigation measures identified in the initial study would reduce the impacts to a less than significant level. There is no substantial evidence, in light of the whole record before the lead agency, City of Greenfield, that the project, with mitigation measures incorporated, may have a significant effect on the environment. See the following project-specific mitigation measures:</p>

Mitigation Measures

Air Quality

AQ-1 To reduce dust emissions from demolition, grading, and construction activities on the project site, the developer shall prepare a Construction Management Plan subject to the review and approval of the Community Development Director or his/her designate prior to issuance of a grading permit and shall implement the approved Construction Management Plan during construction activities. The plan will include the following measures:

- a. The following language shall be included in all bid documents, grading and construction plans prior to the issuance of a building permit, and will be implemented by the project contractor during construction:
 1. All exposed surfaces (e.g., parking areas, staging area, soil piles, graded areas, and unpaved access roads) will be watered with non-potable water twice per day, at a minimum.
 2. All haul trucks transporting soil, sand, or other loose material off-site will be covered.
 3. All vehicle speeds on unpaved roads will be limited to 15 miles per hour.
 4. All roadways, driveways, and sidewalks to be paved will be completed as soon as possible. Building pads will be laid as soon as possible after grading unless seeding or soil binders are used.
 5. Idling times will be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
 6. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
 7. Stage construction equipment and materials as far away from residential land uses to the extent feasible.

AQ-2 The developer shall include the following measures in its Construction Management Plan identified in Mitigation Measure AQ-1:

- a. Heavy-duty diesel vehicles will have 2010 or newer model year engines, in compliance with the California Air Resources Board's Truck and Bus Regulation, and will not be staged within 500 feet of occupied residences; and

- b. Idling of construction equipment and heavy-duty diesel trucks will be avoided where feasible, and if idling is necessary, it will not exceed three minutes.
- c. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications and will be checked by a certified visible emissions evaluator.
- d. All non-road diesel construction equipment will, at a minimum, meet Tier 3 emission standards listed in the Code of Federal Regulations Title 40, Part 89, Subpart B, §89.112. Further, where feasible, construction equipment will use alternative fuels such as compressed natural gas, propane, electricity or biodiesel.

Biological Resources

BIO-1 To avoid impacts to nesting birds during the nesting season (January 15 through September 15), all construction activities should be conducted between September 16 and January 14, which is outside of the bird nesting season. If construction or project-related work is scheduled during the nesting season, a qualified biologist shall conduct nesting bird surveys.

- a. Two surveys for active bird nests will occur within 14 days prior to start of construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding each work area are typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys will be conducted at the appropriate times of day to observe nesting activities. Locations off the site to which access is not available may be surveyed from within the site or from public areas. If no nesting birds are found, a letter report confirming absence will be prepared and submitted to the City of Greenfield Community Development Department and no further mitigation is required.
- b. If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of each nest to characterize "normal" bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman shall have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. Once the absence of nesting birds has been confirmed, a letter report will be prepared and submitted to the City of Greenfield Community Development Department.

BIO-2 The following measures shall be implemented to avoid loss of or harm to special-status bat species:

- a. Approximately 14 days prior to tree removal or construction activities, a qualified biologist shall conduct a habitat assessment for bats and potential roosting sites in trees to be removed and in trees or buildings within 50 feet of the construction easement. These surveys shall include a visual inspection of potential roosting features (bats need not be present) and a search for presence of guano within the project site, construction access routes, and 50 feet around these areas. Cavities, crevices, exfoliating bark, and bark fissures that could provide suitable potential nest or roost habitat for bats shall be surveyed. Assumptions can be made on what species is present due to observed visual characteristics along with habitat use, or the bats can be identified to the species level with the use of a bat echolocation detector such as an “Anabat” unit. Potential roosting features found during the survey shall be flagged or marked.
- b. If no roosting sites or bats are found, a letter report confirming absence shall be prepared and submitted to the City of Greenfield Community Development Department and no further mitigation is required.
- c. If bats or roosting sites are found, bats shall not be disturbed without specific notice to and consultation with California Department of Fish and Wildlife.
- d. If bats are found roosting outside of the nursery season (May 1 through October 1), California Department of Fish and Wildlife shall be consulted prior to any eviction or other action. If avoidance or postponement is not feasible, a Bat Eviction Plan will be submitted to California Department of Fish and Wildlife for written approval prior to project implementation. A request to evict bats from a roost includes details for excluding bats from the roost site and monitoring to ensure that all bats have exited the roost prior to the start of activity and are unable to re-enter the roost until activity is completed. Any bat eviction shall be timed to avoid lactation and young-rearing. If bats are found roosting during the nursery season, they shall be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 50-foot buffer zone (or different size if determined in consultation with the California Department of Fish and Wildlife) shall be established around the roosting site within which no construction activities including tree removal or structure disturbance shall occur until after the nursery season.

BIO-3 Prior to ground disturbance, a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of special-status species potentially occurring in the project vicinity, including, but not limited to,

San Joaquin kit fox, special-status bats, and nesting birds and raptors. Their habitats, general measures that are being implemented to conserve species as they relate to the project, and the boundaries within which disturbance activities will occur will be explained. Informational handouts with photographs clearly illustrating the species' appearances shall be used in the training session. All new construction personnel shall undergo this mandatory environmental awareness training.

The qualified biologist will train biological monitors selected from the construction crew by the construction contractor (typically the project foreman). Before the start of work each day, the monitor will check for animals under any equipment such as vehicles and stored pipes within active disturbance areas. The monitor will also check all excavated steep-walled holes or trenches greater than one foot deep for trapped animals. If a special-status species is observed within an active disturbance area, the qualified biologist will be notified immediately and all work within 50 feet of the individual will be halted and all equipment turned off until the individual has left the disturbance area.

The City of Greenfield Community Development Department shall document evidence of completion of this training prior to ground disturbance

BIO-4 The U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance (USFWS 2011) shall be implemented prior to initiation of and during any construction activity on the project site to avoid unintended take of individual San Joaquin kit foxes.

Preconstruction/pre-activity surveys for San Joaquin kit fox shall be conducted no less than 30 days prior to the beginning of ground disturbance and/or construction activities or any project activity that may impact San Joaquin kit fox. The surveys shall include all work areas and a minimum 200-foot buffer of the project site. The preconstruction surveys shall identify kit fox habitat features on the project site, evaluate use by kit fox and, if possible, assess the potential impacts of the proposed activity. The status of all dens shall be determined and mapped.

If a natal/pupping den is discovered within the project area or within 200 feet of the project boundary, the applicant shall consult with the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service to establish an appropriate avoidance buffer. The avoidance buffer shall be maintained until such time as the burrow is no longer active and/or an incidental take permit is determined to be required and is obtained.

In addition, the following measures shall be observed:

- a. Project-related vehicles shall observe a 20-mph speed limit in all project areas; this is particularly important at night when kit foxes are most active. To the extent possible, night-time construction shall be minimized. Off-road traffic outside of designated project area shall be prohibited.

- b. To prevent inadvertent entrapment of kit foxes or other animals during the construction phase of the project, all excavated, steep-walled holes or trenches more than two feet deep shall be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped animals. If at any time a trapped or injured kit fox is discovered, the procedures under number 11 of the Construction and Operational Requirements in the Standardized Recommendations must be followed.
- c. Kit foxes are attracted to den-like structures such as pipes and may enter stored pipe becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of four inches or greater that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the U.S. Fish and Wildlife Service has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity, until the fox has escaped.
- d. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in closed containers and removed at least once a week from a construction or project site.
- e. No firearms shall be allowed on the project site during construction activities.
- f. To prevent harassment, mortality of kit foxes or destruction of dens by dogs or cats, no pets shall be permitted on site during construction activities.
- g. Use of rodenticides and herbicides on the project site during construction shall be restricted. This is necessary to prevent primary or secondary poisoning of kit foxes and the depletion of prey populations on which they depend. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and Federal legislation, as well as additional project-related restrictions deemed necessary by the U.S. Fish and Wildlife Service. If rodent control must be conducted, zinc phosphide shall be used because of proven lower risk to kit fox.
- h. In the case of trapped animals, escape ramps or structures shall be installed immediately to allow the animal(s) to escape.
- i. Any contractor, employee, or agency personnel who inadvertently kills or injures a San Joaquin kit fox shall immediately report the incident to the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service.

Hazards and Hazardous Materials

HAZ-1 The proposed project is required to prepare a Phase I Environmental Site Assessment to determine the presence, or lack of, hazardous materials on the project site. This report shall be prepared, reviewed, and approved by the City Community Development Department prior to the issuance of a grading permit.

Hydrology and Water Quality

Refer to Mitigation Measures UTIL-1 and UTIL-2.

Noise

N-1 The proposed homes on Lot 7, Lot 14, Lot 15, and Lot 20 must include air conditioning or mechanical ventilation so that windows and doors can remain closed for sound insulation purposes.

Utilities and Service Systems

UTIL-1 If there is an update to the City's development impact fees associated with, but not limited to, water facilities, wastewater facilities, and transportation facilities at the time of the project's issuance of a certificate of occupancy, the project developer is required to pay its fair share as determined by the City. If this update is not completed at the time of the project's issuance of a certificate of occupancy, the proposed project is required to pay the development impact fees pursuant to City Ordinance 458, Section 1, 2005.

UTIL-2 If a benefit assessment district has been established in an area that encompasses the project site at the time of the project's issuance of a certificate of occupancy, the project is required to participate in this benefit assessment district and to contribute funds and encumber properties in this district in the amount determined by the benefit assessment district's guidelines.

DRAFT INITIAL STUDY

APPLE AVENUE SUBDIVISION
CITY OF GREENFIELD

PREPARED FOR

City of Greenfield

599 El Camino Real

Greenfield, CA93927

Tel 805.350.3282

PREPARED BY

EMC Planning Group Inc.

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Monterey, CA 93940

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January 2023

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A. BACKGROUND

Project Title	Apple Avenue Subdivision
Lead Agency Contact Person and Phone Number	Rob Mullane, AICP, Consulting Planner 805-227-4359
Date Prepared	January 2023
Study Prepared by	EMC Planning Group Inc. 601 Abrego Street Monterey, CA 93940
Project Location	296 Apple Avenue, Greenfield
Project Sponsor Name and Address	People's Self-Help Housing Corporation
General Plan Designation	Medium Density Residential
Zoning	Multi-Family Residential (R-M)

Setting

The approximately 4.6-acre project site is located at the northeast corner of 3rd Street and Apple Avenue at 296 Apple Avenue in the City of Greenfield (APN 109-082-013). The site is approximately 1.75 miles west of the Salinas River, and approximately 2.75 miles east of the Arroyo Seco, a tributary of the Salinas River. It is surrounded by a rural residence to the north, residential neighborhoods to the east and south, and Greenfield Community Park to the west. Cesar Chavez Elementary School is located 360 feet to the east on Apple Avenue.

The property includes one single-family home and one mobile home fronting Apple Avenue, both surrounded by trees, while the remainder of the property is vacant. The property has a general plan land use designation of Medium Density Residential and is zoned Multi-Family Residential (R-M).

[Figure 1, Location Map](#), presents the regional location of the project site. [Figure 2, Aerial Photograph](#), presents an aerial of the project site and surrounding land uses. [Figure 3, Site Photographs](#), illustrates the existing setting of the project site.

Description of Project

The proposed project includes a Vesting Tentative Map and Planned Development to subdivide the approximately 4.6-acre property and construct 36 detached single-family residences (one- and two-story) each with their own two-car garage and a 37th lot for an 11,279-square foot detention basin. All 36 residences will be low and very-low income 3-bedroom housing units. The detention basin would be commonly owned and annexed into the City of Greenfield's Storm Water Maintenance District. The detention basin lot would have a six-foot high chain link fence gate fronting 3rd Street.

The proposed project involves new public rights-of way with Cardona Circle extending from the adjacent subdivision through the project site to 3rd Street at 56 feet wide and a new public right-of-way extending from Apple Avenue to intersect with Cardona Circle at 49 feet wide. In addition, a new 32-foot-wide alley off the new public right-of-way will serve the homes along this alley extending to 3rd Street where users would be protected by bollards; this alley will only be accessible for pedestrians, cyclists, and emergency vehicles with no parking allowed.

The proposed project also includes a six-foot concrete-panel screening wall to be constructed along the project's 3rd Street frontage and 3rd Street will be widened by approximately 21 feet through dedication to the City of Greenfield via the Vesting Tentative Map. Apple Avenue will also be widened from approximately 30 feet to approximately 49 feet flowline to flowline and improved with curb, gutter, sidewalk, and parkways.

[Figure 4, Site Plan](#), illustrates the project's proposed site plan, and [Appendix A](#) includes the full set of project plans.

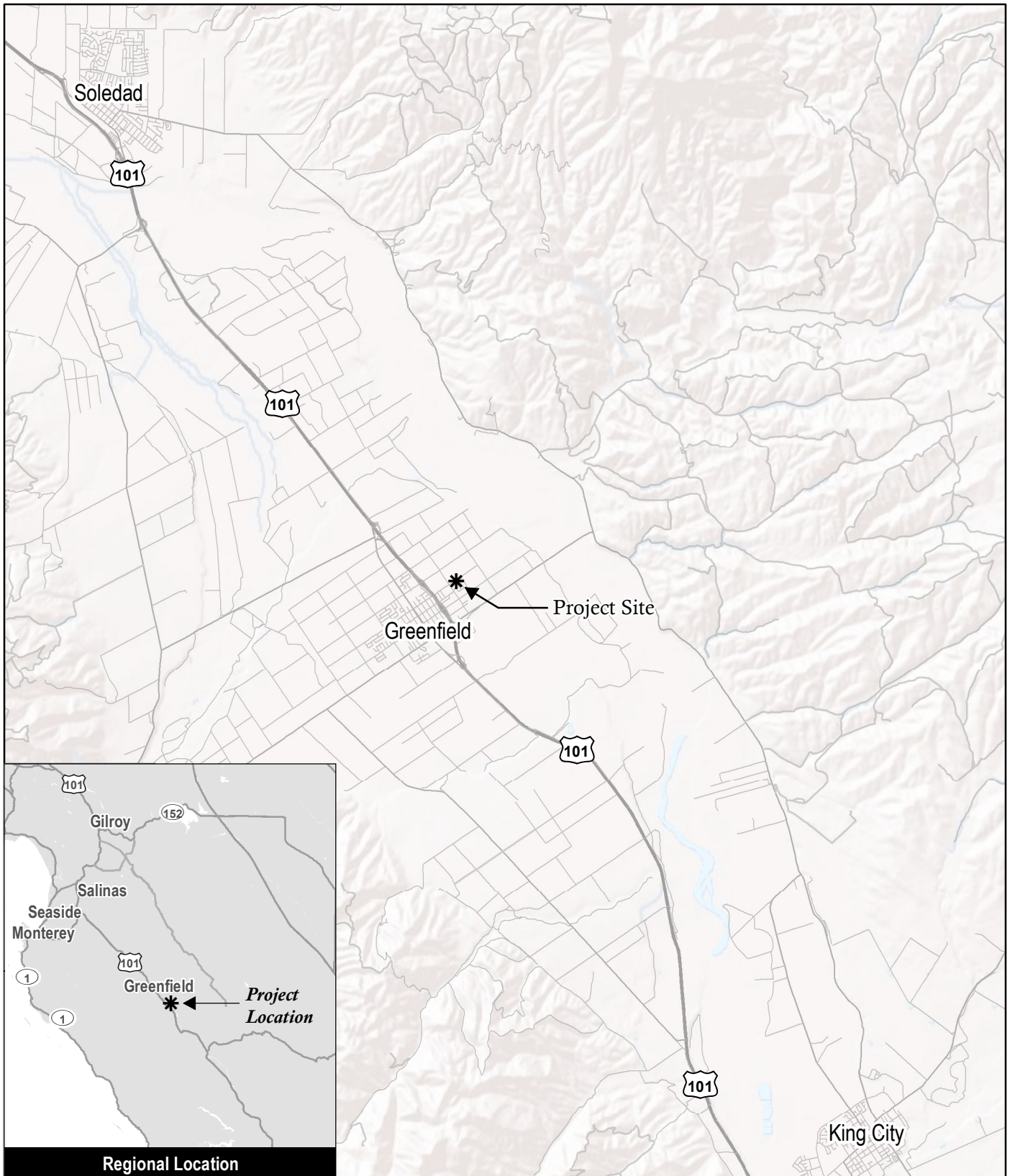
Other Public Agencies Whose Approval is Required

Central Coast Regional Water Quality Control Board

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

The City sent out an offer of consultation letter to the Ohlone/Coastonan-Esselen Nation Tribe on July 25, 2022. The Tribe has 30 days from receipt of the letter to respond and request consultation. At the time of initial study preparation, no response had occurred.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

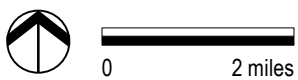


Source: ESRI 2014

Figure 1

Location Map

Apple Avenue Subdivision Initial Study



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0 300 feet



Project Site

Source: Monterey County GIS 2022, Google Earth 2022

Figure 2

Aerial Photograph



Apple Avenue Subdivision Initial Study

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① On Apple Avenue facing northwest at an existing onsite residence.



② On Apple Avenue facing northwest at an existing onsite residence.



 Project Site

Source: Google Earth 2022
Photographs: EMC Planning Group 2022

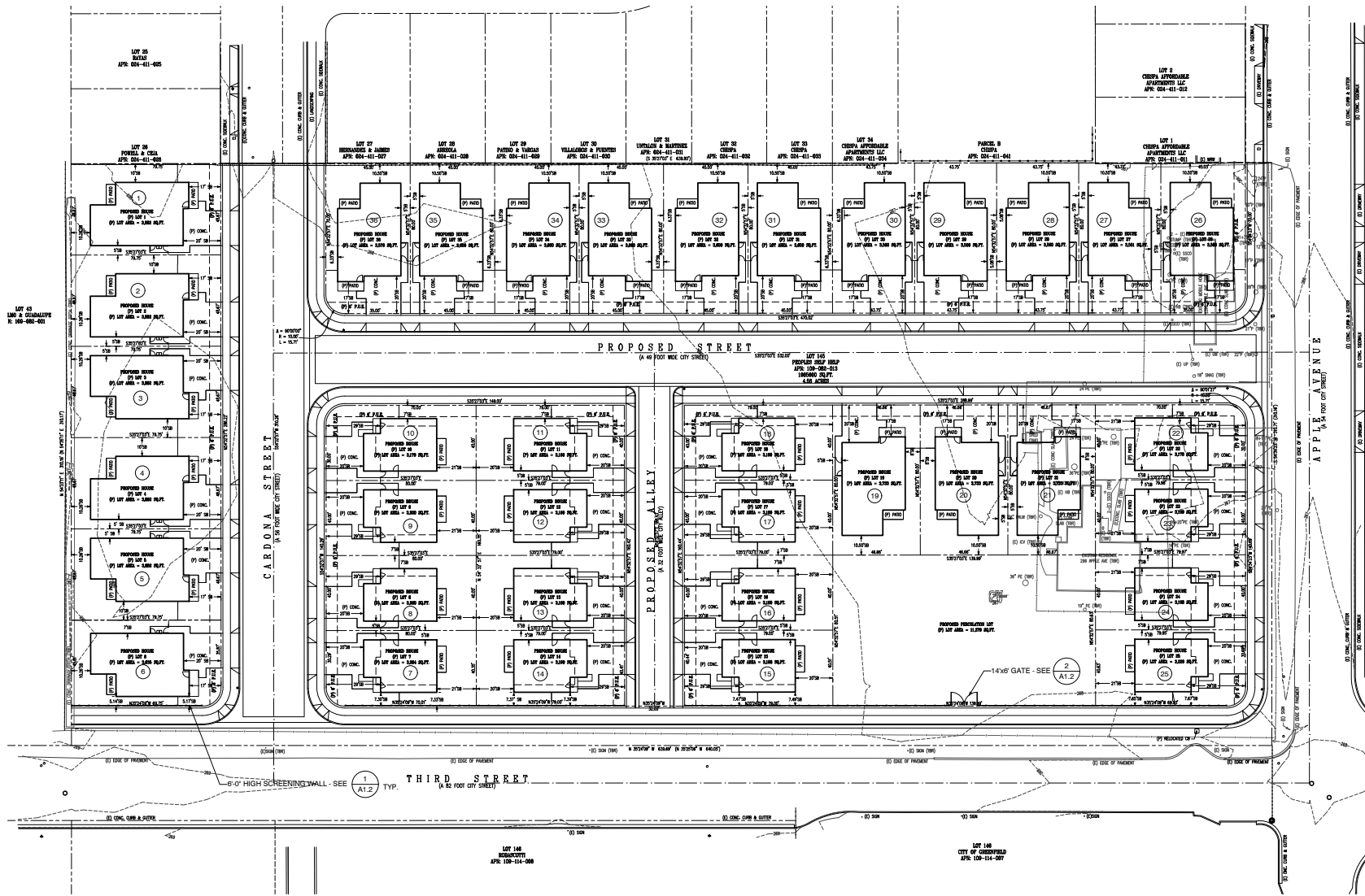


③ On Cordona Circle, at the northeast corner of the project site facing southwest.



④ On 3rd Street facing northeast across the project site.

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Source: Paul Davis Partnership Architects & Planners 2022

Figure 4
Site Plan

Apple Avenue Subdivision Initial Study



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B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|---|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities/Service Systems |
| <input type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

C. DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Paul Mugan, Community Devel. Director

2/2/2023

Date

D. EVALUATION OF ENVIRONMENTAL IMPACTS

Notes

1. All answers take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
2. Once it has been determined that a particular physical impact may occur, then the checklist answers indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
3. “Negative Declaration: Less-Than-Significant Impact with Mitigation Measures Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less-Than-Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from section XVII, “Earlier Analyses,” may be cross-referenced).
4. Earlier analyses are used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. [Section 15063(c)(3)(D)] In this case, a brief discussion would identify the following:
 - a. “Earlier Analysis Used” identifies and states where such document is available for review.
 - b. “Impact Adequately Addressed” identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. “Mitigation Measures”—For effects that are “Less-Than-Significant Impact with Mitigation Measures Incorporated,” mitigation measures are described which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
5. Checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances, etc.) are incorporated. Each reference to a previously prepared or outside document, where appropriate, includes a reference to the page or pages where the statement is substantiated.
6. “Supporting Information Sources”—A source list is attached, and other sources used or individuals contacted are cited in the discussion.
7. The explanation of each issue identifies:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any to reduce the impact to less than significant.

1. AESTHETICS

Except as provided in Public Resources Code Section 21099 (Modernization of Transportation Analysis for Transit-Oriented Infill Projects), would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Analysis:

- a. According to the *Chapter 10 Environmental Review (Final EIR Certified May 31, 2005)* (“General Plan EIR”) (City of Greenfield 2005a), areas of agricultural land and rural residential uses on the fringe of the city limits give Greenfield its identity as an agricultural community (p. 10-22). The *City of Greenfield General Plan 2005-2025* (“General Plan”) (City of Greenfield 2005b) also includes the views of Gabilan Mountain Range, the Santa Lucia Mountain Range, and Arroyo Seco as being a scenic resource (Goal 7.9, p. 7-13).

The proposed project is surrounded by rural and single-family residences to the north, east, and south, with the Greenfield Community Park to the west, and agricultural uses to the northwest. Views of the Gabilan Mountain Range to the east exist for drivers on 3rd Street going north and views of the Santa Lucia Mountain Range to the west exist for those who live on Cardona Circle. Refer to images 3 and 4 within Figure 3, Site Photographs.

Although views from 3rd Street and Cardona Circle would be permanently altered with the development of the project, the project site was anticipated for residential development by the General Plan and evaluated in the General Plan EIR. In addition, the proposed use of the site would be similar to the uses existing to the north, east and south; therefore, the project would be surrounded by similar development in its use and structural appearance.

The 11,279 square foot detention basin component of the project, to be located at the southwest corner of the site, would help reduce the impact of the altered views and the proposed alley and extension of Cardona Circle would allow for views of the Gabilan Mountain Range for drivers on 3rd Street.

The proposed project would comply with General Plan Goal 2.1, which ensures that redevelopment and new development is designed, sited, and constructed in a manner that creates a balanced and desirable City, maintains and enhances the character and best qualities of the community, and ensures that Greenfield remains economically viable; Policy 2.1.1, which requires that new development be consistent with the scale, appearance, and rural community character of Greenfield's neighborhoods; and Policy 2.1.9, encouraging infill and intensification of land uses through the reuse or redevelopment or underutilized industrial, commercial, and residential sites where infrastructure supports such development.

In addition to the proposed project being consistent with the General Plan land use and zoning designations, it's consistent with the scale and appearance of the surrounding existing residences (which exist on two sides), involves low- and very-low-income housing ensuring that the City remain economically viable to residents, and involves the infill of an underutilized residential site where infrastructure supports this development. For these reasons, the proposed project's visual impacts on views of the surrounding mountain ranges would be less than significant.

- b. There are no state-designated scenic highways in or around the City of Greenfield. Therefore, the proposed project would not impact visual resources within a state-designated scenic highway.
- c. The project site is located at the urban-rural edge of Greenfield, is surrounded by existing residential development on three sides, and is designated by the General Plan as Medium Density Residential. The zoning of the site is Multi-Family Residential (R-M), which allows for one- and two-story single-family residential housing such as the proposed project. Therefore, the project would not conflict with applicable zoning.

As mentioned previously, the project includes an 11,279 square foot detention basin that would help reduce the impact of the altered views and the proposed alley and extension of Cardona Circle would allow for views of the Gabilan Mountain Range for drivers on 3rd Street. Although views of the surrounding mountain ranges would be altered by development of the proposed project, the site was evaluated in the General Plan EIR and anticipated by the City for residential development. Therefore, the project would result in less than significant impacts on regulations governing scenic quality.

- d. Existing light sources in the area include street lights, exterior lighting from nearby residences, and vehicle headlights from motorists driving along local roadways. Development of the proposed project with 36 single-family residences would introduce a new source of light and glare to the site, which currently includes only one single-family residence and one mobile home.

Although the proposed project would introduce new light to the site, the uses proposed have been evaluated in the General Plan EIR and anticipated by the General Plan. Its proposed use is also similar to adjacent uses and would be consistent with the residential neighborhood lighting. The proposed project would be required to include street lighting that would be similar to those existing throughout the City of Greenfield. Exterior lighting for the individual residences would be identified as part of the Vesting Tentative Map and Design Review process and included on the project plan set. As a tract map application, exterior lighting would need to comply with the City's Outdoor Lighting Standards in Section 17.56.020, including shielding requirements, allowable levels of illumination, maximum fixture height, and energy efficiency.

With enforcement of the City's existing regulations regarding light and glare, such as those listed within City Municipal Code Chapter 17.56, impacts related to light and glare from the proposed project would be less than significant.

2. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts on agricultural resources are significant environmental effects and in assessing impacts on agriculture and farmland, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Analysis:

- a. The California Department of Conservation identifies the project site as Grazing Land (California Department of Conservation 2018). Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to an urban use.

- b. The project site is zoned for Multi-Family Residential (R-M) and is not within a Williamson Act contract. Therefore, the project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.
- c. The project site is zoned Multi-Family Residential and, therefore, would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.
- d. The project site is zoned Multi-Family Residential and, therefore, would not result in the loss of forest land or conversion of forest land to non-forest use.
- e. The project site is surrounded by residences to the north, east, and south and, therefore, the proposed project would blend with its surrounding urban uses. According to the California Department of Conservation, the land to the northwest of the project site, across 3rd Street, is designated as Prime Farmland (California Department of Conservation 2018). However, because the proposed project would be consistent with the General Plan designation and zoning of the site and would involve urban uses in a densely urban area of Greenfield, the proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions, such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Analysis:

The City of Greenfield is within the North Central Coast Air Basin (NCC Air Basin), which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD). This section is based primarily on MBARD’s CEQA Air Quality Guidelines (2008) guidance, MBARD’s 2012 – 2015 Air Quality Management Plan (2017) (AQMP), and the results of emissions modeling using the California Emission Estimation Model (CalEEMod) version 2020.4 software. CalEEMod results are included in [Appendix B](#).

- a. Projects related directly to population growth generate population-related emissions (e.g., motor vehicles, residential heating and cooling emissions). Population-related emissions have been estimated in the AQMP; population-related projects that are consistent with these forecasts are consistent with the plan. MBARD uses consistency with the AQMP to determine a project’s cumulative impact on regional air quality under CEQA. MBARD has established a consistency determination procedure tied to population growth – a project that does not result in an increase in population beyond that projected by the Association of Monterey Bay Area Governments is considered not to conflict with the AQMP.

The most recent growth projections for the City of Greenfield are in the 2018 Regional Growth Forecast (AMBAG 2018), based on the City’s own growth projections outlined in the General Plan. The proposed project is a residential project on a site that has a General Plan land use designation of Medium Density Residential, 15 dwelling units per

acre. The proposed project would develop 36 single-family residential units at a density of approximately 7.83 dwelling units per acre and provide housing for an estimated 165 persons (refer also to the discussion in Section D.14, Population and Housing). The population housed by the proposed project is consistent with General Plan residential land use densities and would not exceed the population projections upon which the air quality management emissions forecasts are based. Therefore, the proposed project would not conflict with or obstruct the AQMP.

- b. The six most common and widespread air pollutants of concern, or “criteria pollutants,” are ground-level ozone, nitrogen dioxide, particulate matter, carbon monoxide, sulfur dioxide, and lead. In addition, reactive organic gases (ROG) also referred to as volatile organic gases (VOC) are a key contributor to the criteria air pollutants because they react with other substances to form ground-level ozone. Health effects of from prolonged exposures to criteria air pollutants include asthma, bronchitis, chest pain, coughing, and heart diseases.

MBARD is the agency with the primary responsibility for assuring that national and state ambient air quality standards are attained and maintained in the NCC Air Basin. MBARD is responsible for monitoring air quality in the NCC Air Basin, which is designated under state criteria as a nonattainment area for ozone and suspended particulate matter (PM₁₀). Under federal criteria, the NCC Air Basin is at attainment (8-hour standard) for ozone and particulates. MBARD has developed criteria pollutant emissions thresholds which are used to determine whether or not a proposed project would violate an air quality standard or contribute to an existing violation during operations and/or construction.

State standards are promulgated by the California Air Resources Board as mandated by the California Clean Air Act. MBARD has developed criteria pollutant emissions thresholds, which are used to determine whether or not the proposed project would violate an air quality standard or contribute to an existing violation during operations and/or construction. Based on MBARD’s CEQA guidelines, a project would have a significant air quality impact if it would:

- Emit 137 pounds per day or more of an ozone precursor air pollutant (volatile organic compounds or nitrogen oxides);
- Directly emit 550 pounds per day or more of carbon monoxide;
- Generate traffic that significantly affects levels of service (result in a significant localized source of emission of carbon monoxide);
- Emit 82 pounds per day or more of suspended particulate matter on-site, which is equivalent to general construction activity over an area of at least 8.1 acres per day, or grading/excavation over an area of at least 2.2 acres per day; or
- Emit 82 pounds per day or more of suspended particulate matter from vehicle travel on unpaved roads.

Operational Emissions

The proposed project would result in new sources of operational mobile and area source emissions. Emissions generated by operations of a 36-unit single-family residential development would not be expected to exceed MBARD criteria air pollutant thresholds. However, emissions modeling undertaken to quantify greenhouse gas (GHG) emissions volumes also show criteria air pollutant emissions volume data, which confirms that the proposed project operational criteria air pollutant emissions would not exceed MBARD standards. A comparison of the model results with MBARD standards are summarized in [Table 1, Unmitigated Operational Criteria Air Pollutant Emissions](#). Detailed emissions modeling results are presented in [Appendix B](#).

Table 1 Unmitigated Operational Criteria Air Pollutant Emissions

Emissions	Volatile Organic Compounds (VOC)^{1,2}	Nitrogen Oxides (NO_x)^{1,2}	Suspended Particulate Matter (PM₁₀)^{1,2}	Carbon Monoxide (CO)^{1,2}
MBARD Thresholds	137	137	82	550
Project	27	2	7	44
Exceeds Thresholds?	NO	NO	NO	NO

SOURCE: EMC Planning Group 2021

NOTES:

1. Results may vary due to rounding.
2. Expressed in pounds per day.

According to MBARD CEQA Guidelines Table 5-4, the proposed 36-unit single-family residential development is well below MBARD’s 810-unit screening size for residential development that could potentially generate significant operational and construction criteria air pollutant emissions.

The model results confirm that the proposed project emissions would not exceed MBARD’s criteria air pollutants emissions thresholds for ambient air quality. Therefore, the operational phase of the proposed project would not result in significant impacts to localized air quality and the project’s contribution to regional air quality would be less than cumulatively considerable.

Construction Emissions

Construction activities are temporary impacts that, depending on the size and type of project, commonly occur in limited time periods. Construction emissions have the potential to significantly impact local air quality or pose localized health risks. Localized health risks are discussed under item c of this section. Construction emissions include equipment exhaust and fugitive dust emissions generated during grading, and ozone precursor emissions generated during the application of architectural coatings and asphalt paving material.

MBARD CEQA guidelines report that construction projects using typical construction equipment such as dump trucks, scrapers, bulldozers, compactors and front-end loaders that temporarily emit ozone precursors such as volatile organic compounds (VOC) or oxides of nitrogen (NO_x), are accommodated in the emission inventories of State- and federally-required air plans and would not have a significant impact on the attainment and maintenance of ozone thresholds. MBARD CEQA Guidelines Table 5-2, Construction Activity with Potentially Significant Impacts, identifies the level of construction activity that could result in significant temporary fugitive dust impacts if not mitigated. Construction activities with grading and excavation that disturb more than 2.2 acres per day and construction activities with minimal earthmoving that disturb more than 8.1 acres per day are assumed to be above the 82 pounds of particulate matter per day threshold of significance. The proposed project, which is located on a .46-acre site, has the potential to result in significant fugitive dust impacts as a result of construction activity, and further analysis is necessary to determine if mitigation is required.

Criteria air pollutant emissions generated during construction are included in the CalEEMod results for project-related GHG emissions. [Table 2, Unmitigated Construction Criteria Pollutant Emissions](#), summarizes unmitigated criteria air pollutant emissions (winter) resulting from project construction.

Table 2 Unmitigated Construction Criteria Pollutant Emissions

Emissions Source	Reactive Organic Gases (ROG)	Nitrogen Oxides (NO _x)	Suspended Particulates (PM ₁₀)	Total Fine Particulates (PM _{2.5})	Carbon Monoxide (CO)
Construction (2023)	45	33	21	12	21

SOURCE: EMC Planning Group 2022

NOTES:

1. Results may vary due to rounding.
2. Expressed in pounds per day.

The project specific model results indicate that the proposed project’s construction emissions (fugitive dust and equipment exhaust) would not exceed MBARD’s criteria air pollutants emissions thresholds for ambient air quality. Therefore, the proposed project would not result in significant impacts to localized air quality during construction, and the project’s contribution to regional air quality would be less than cumulatively considerable. The CalEEMod results are included in [Appendix B](#).

- c. The proposed project has the potential to exposure sensitive receptors to localized health risks associated with toxic air contaminant (TAC) emissions from construction equipment exhaust. TACs are pollutants that may be expected to result in an increase in mortality or serious illness or may pose a present or potential hazard to human health. Health effects include cancer, birth defects, neurological damage, damage to the body's natural defense system, and diseases that lead to death. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuels combustion, and commercial

operations (e.g., dry cleaners). Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TACs. Diesel particulate matter (DPM) is the primary TAC of concern within diesel exhaust. The primary community risk impact issues associated with construction exhaust emissions are cancer risk (DPM exposures) and exposure to PM_{2.5}.

According to MBARD's CEQA guidelines, a sensitive receptor is generally defined as a location where human populations, especially children, seniors, and sick persons, are located where there is reasonable expectation of continuous human exposure. These typically include residences, hospitals, and schools. The sensitive receptors nearest to the project site are residential homes and neighborhoods are located immediately adjacent to the project site on the north and east and the classrooms of Cesar Chavez Elementary School, which are located approximately 340 feet to the southeast of the project site.

Residential uses are not sources of toxic air contaminants that would increase health risks. However, project construction activities would generate temporary and limited localized emissions of dust and diesel equipment exhaust. Therefore, exposure to construction emissions from the project site is a potentially significant health risk impact. MBARD recommends the use of best management practices during construction to reduce construction-related fugitive dust emissions by up to 50 percent (MBARD 2008), which would further reduce fugitive dust emissions during construction. Additionally, emissions from engines used in construction, which are primarily diesel, are subject to control under regulations adopted by both California Air Resources Board (CARB) and U.S. EPA. U.S. EPA promulgated new emission standards for off-road engines in 1998, with CARB adopting parallel standards in 2000. In 2004, Tier 4 emission standards were adopted and were phased in for new engines between 2011 and 2014. In 2007 CARB adopted an off-road equipment regulation to accelerate reductions of NO_x and diesel PM from existing off-road engines. Beginning in 2012 and through 2023, the off-road regulation requires operators of older equipment to either install abatement devices, upgrade to Tier 3 and eventually Tier 4 engines, or to retire older equipment.

Implementation of the following mitigation measures ensures that the increased health risks from potential exposures to construction TAC emissions exposures are less than significant.

Mitigation Measures

AQ-1 To reduce dust emissions from demolition, grading, and construction activities on the project site, the developer shall prepare a Construction Management Plan subject to the review and approval of the Community Development Director or his/her designate prior to issuance of a grading permit and shall implement the approved Construction Management Plan during construction activities. The plan will include the following measures:

- a. The following language shall be included in all bid documents, grading and construction plans prior to the issuance of a building permit, and will be implemented by the project contractor during construction:

1. All exposed surfaces (e.g., parking areas, staging area, soil piles, graded areas, and unpaved access roads) will be watered with non-potable water twice per day, at a minimum.
2. All haul trucks transporting soil, sand, or other loose material off-site will be covered.
3. All vehicle speeds on unpaved roads will be limited to 15 miles per hour.
4. All roadways, driveways, and sidewalks to be paved will be completed as soon as possible. Building pads will be laid as soon as possible after grading unless seeding or soil binders are used.
5. Idling times will be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
6. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
7. Stage construction equipment and materials as far away from residential land uses to the extent feasible.

AQ-2 The developer shall include the following measures in its Construction Management Plan identified in Mitigation Measure AQ-1:

- a. Heavy-duty diesel vehicles will have 2010 or newer model year engines, in compliance with the California Air Resources Board's Truck and Bus Regulation, and will not be staged within 500 feet of occupied residences; and
- b. Idling of construction equipment and heavy-duty diesel trucks will be avoided where feasible, and if idling is necessary, it will not exceed three minutes.
- c. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications and will be checked by a certified visible emissions evaluator.
- d. All non-road diesel construction equipment will, at a minimum, meet Tier 3 emission standards listed in the Code of Federal Regulations Title 40, Part 89, Subpart B, §89.112. Further, where feasible, construction equipment will use alternative fuels such as compressed natural gas, propane, electricity or biodiesel.

Implementation of mitigation measures AQ-2 in addition to mitigation measure AQ-1 would reduce the potential increased health risks from exposures to temporary construction emissions to less than significant.

- d. **Odors.** According to MBARD CEQA guidelines, odors are objectionable emissions of one or more pollutants that are a nuisance to healthy persons and may trigger asthma episodes in people with sensitive airways. Nuisance odors are commonly associated with refineries, landfills, sewage treatment, agriculture, etc. The proposed residential project may result in short-term construction-related odors (e.g., asphalt during paving), but is not anticipated to produce offensive odors after the project is completed and occupied. Therefore, the proposed project would not create significant objectionable odors affecting a substantial number of people.

4. BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Analysis:

A previous biological assessment was prepared for this project: *Biological Resource Assessment for 296 Apple Avenue, APN 109-82-013, City of Greenfield, California* (“biological report”, Althouse and Meade, Inc. 2021). A peer review of this document was conducted by EMC Planning Group to determine if this report was conducted according to professional standards, comprehensively addresses biological and aquatic resources with the potential to occur on or in the vicinity of the project site, and is adequate for inclusion in a legally defensible environmental document (EMC Planning Group 2022). These two documents were reviewed for this initial study section and are included in [Appendix C](#).

EMC Planning Group reviewed site plans, aerial photographs, natural resource database mapping and reports, and other relevant scientific literature. This included searching the U.S. Fish and Wildlife Service (USFWS) *Endangered Species Database* (USFWS 2022a), California Department of Fish and Wildlife (CDFW) *California Natural Diversity Database* (CDFW 2022), and California Native Plant Society (CNPS) *Inventory of Rare and Endangered Plants* (CNPS 2022) to identify special-status plants, wildlife, and habitats known to occur in the vicinity of the project site.

Special-status species in this report are those listed as Endangered, Threatened, or Rare, or as Candidates for listing by the USFWS and/or CDFW; as Species of Special Concern or Fully Protected species by the CDFW; or as Rare Plant Rank 1B or 2B species by the CNPS. A review was also conducted of the National Wetlands Inventory (USFWS 2022b) to identify potential jurisdictional aquatic features on or adjacent to the project site.

The approximately 4.9-acre project site is located in the City of Greenfield, Monterey County, California, on the Greenfield United States Geological Survey (USGS) quadrangle map, with a flat topography and an approximate elevation of 270 feet above sea level. The project site is currently developed with two residences and various outbuildings with the remainder of the site vacant. The site was previously in agricultural use, but appears to be vacant as of the mid-1990s (Pacific Coast Testing 2021). The project site is surrounded by residential neighborhoods to the northeast and southeast, a community park to the southwest, and agricultural land to the northwest.

The residential structures on the project site are surrounded by planted non-native trees including Peruvian pepper trees (*Schinus molle*), tamarisk (*Tamarix* sp.), and California fan palm (*Washingtonia filifera*).

Wildlife habitat quality on the project site is considered low due to the high level of disturbance from agricultural activities. The biological survey conducted in 2021 found the agricultural field fallow with invading ruderal (weedy) plants, such as non-native cheeseweed (*Malva parviflora*), Russian thistle (*Salsola tragus*), wild mustard (*Hirschfeldia incana*), and bindweed (*Convolvulus arvensis*) (Althouse and Meade 2021). Plant cover required by many animal species is likely intensively removed through the application of herbicides.

Common wildlife species likely to occur on the project site include raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), Virginia opossum (*Didelphis virginiana*), and California ground squirrel (*Spermophilus beecheyi*). Small rodents including mice (*Mus musculus*, *Reithrodontomys megalotis*, and *Peromyscus maniculatus*) and California vole (*Microtus californicus*) may also occur, along with common reptiles such as western fence lizard (*Sceloporus occidentalis*) and Pacific gopher snake (*Pituophis catenifer*).

Several species of birds were observed using the project site during the 2021 biological survey including Eurasian collared-dove (*Streptopelia decaocto*), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottos*), and mourning dove (*Zenaida macroura*) (Althouse and Meade 2021).

There are no wetlands or waterways on the project site.

- a. **Special-Status Species.** A search of the California Department of Fish and Wildlife (CDFW) *California Natural Diversity Database* was conducted for the Greenfield and the surrounding eight U.S. Geological Survey (USGS) quadrangles in order to generate a list of potentially occurring special-status species for the project vicinity. Records of occurrence for special-status plants were reviewed for those quadrangles in the CNPS *Inventory of Rare and Endangered Plants* of California. A USFWS *Endangered Species Program* threatened and endangered species list was also generated for Monterey County, and the USFWS *Critical Habitat for Threatened & Endangered Species* online mapper was reviewed. Special-status species in this report are those listed as Endangered, Threatened, or Rare, or as candidates for listing by the USFWS and/or CDFW; as Species of Special Concern or Fully Protected species by the CDFW; or as Rare Plant Rank 1B or 2B species by CNPS. Appendices A and B, Special Status Plants and Animals Reported from the Region, in the biological report ([Appendix C](#)), present tables with CNDDDB results, and list special-status species documented within the project vicinity, their listing status and suitable habitat description, and their potential to occur on the project site. Figures 5 and 6, California Natural Diversity Database Plant and Animal Records (pages 22 and 29 of the biological report, [Appendix C](#)), present maps of CNDDDB results.

Given the disturbed condition of the project site, the lack of native vegetation, and the site's isolation from high quality habitat areas, most special-status plant and animal species known to occur in the region are not expected to occur on the project site due to lack of suitable habitats.

Special-status plant and wildlife species are recorded as occurring in the vicinity of the project site but are not likely to occur on the project site due to lack of suitable habitat include Lemmon's jewelflower (*Caulanthus lemmonii*), recurved larkspur (*Delphinium recurvatum*), California tiger salamander (*Ambystoma californiense*), California red-legged frog (*Rana draytonii*), tricolored blackbird (*Agelaius tricolor*), coast horned lizard (*Phrynosoma blainvillii*), western spadefoot (*Spea hammondi*), and western pond turtle (*Emys marmorata*).

Special-status wildlife species with a low potential to occur on the project site include San Joaquin kit fox (*Vulpes macrotis mutica*), Cooper's hawk (*Accipiter cooperi*), white-tailed kite (*Elanus leucurus*), Townsend's big-eared bat (*Corynorhinus townsendii*), Yuma myotis (*Myotis yumanensis*), and protected nesting birds. These species are discussed further below.

Nesting Birds. Protected nesting bird species and raptor species, such as Cooper's hawk and white-tailed kite, have the potential to nest in buildings or structures, on open ground, or in any type of vegetation, including trees, during the nesting bird season (January 15 through September 15). The project site and surrounding properties contain a variety of trees, shrubs, and open grassland areas suitable for nesting. Construction activities, including ground disturbance, and tree removal can impact nesting birds protected under the federal Migratory Bird Treaty Act and California Fish and Game Code, should nesting birds be present during construction. If protected bird species are nesting on or adjacent to the project site during the bird nesting season, then noise-generating construction activities could result in the loss of fertile eggs, nestlings, or

otherwise lead to the abandonment of nests. Implementation of the following mitigation measure would reduce the potential impact to nesting birds to a less-than-significant level.

Mitigation Measure

BIO-1 To avoid impacts to nesting birds during the nesting season (January 15 through September 15), all construction activities should be conducted between September 16 and January 14, which is outside of the bird nesting season. If construction or project-related work is scheduled during the nesting season, a qualified biologist shall conduct nesting bird surveys.

- a. Two surveys for active bird nests will occur within 14 days prior to start of construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding each work area are typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys will be conducted at the appropriate times of day to observe nesting activities. Locations off the site to which access is not available may be surveyed from within the site or from public areas. If no nesting birds are found, a letter report confirming absence will be prepared and submitted to the City of Greenfield Community Development Department and no further mitigation is required.
- b. If the qualified biologist documents active nests within the project site or in nearby surrounding areas, an appropriate buffer between each nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of each nest to characterize “normal” bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman shall have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. Once the absence of nesting birds has been confirmed, a letter report will be prepared and submitted to the City of Greenfield Community Development Department.

Implementation of this mitigation measure would reduce the potential significant impact to nesting birds to a less-than-significant level by requiring pre-construction surveys for active bird nests and the implementation of avoidance, minimization, and mitigation measures should they be found on the project site.

Special-Status Bats. Trees in the project area and/or buildings or structures on or adjacent to the project site could provide roosting habitat for special-status bat species known to occur in the vicinity of the project site, including Townsend’s big-eared bat and Yuma myotis. These bat species inhabit a wide variety of habitats including grasslands, woodlands, and forests. Tree removal and construction activities at the project site could

result in the disturbance of roost and natal sites occupied by special-status bats on or adjacent to the project site, if present. Loss or harm to special-status bats is considered a significant adverse impact. Implementation of the following mitigation measure would reduce the potential impact to special-status bat species to a less-than-significant level.

Mitigation Measure

BIO-2 The following measures shall be implemented to avoid loss of or harm to special-status bat species:

- a. Approximately 14 days prior to tree removal or construction activities, a qualified biologist shall conduct a habitat assessment for bats and potential roosting sites in trees to be removed and in trees or buildings within 50 feet of the construction easement. These surveys shall include a visual inspection of potential roosting features (bats need not be present) and a search for presence of guano within the project site, construction access routes, and 50 feet around these areas. Cavities, crevices, exfoliating bark, and bark fissures that could provide suitable potential nest or roost habitat for bats shall be surveyed. Assumptions can be made on what species is present due to observed visual characteristics along with habitat use, or the bats can be identified to the species level with the use of a bat echolocation detector such as an “Anabat” unit. Potential roosting features found during the survey shall be flagged or marked.
- b. If no roosting sites or bats are found, a letter report confirming absence shall be prepared and submitted to the City of Greenfield Community Development Department and no further mitigation is required.
- c. If bats or roosting sites are found, bats shall not be disturbed without specific notice to and consultation with California Department of Fish and Wildlife.
- d. If bats are found roosting outside of the nursery season (May 1 through October 1), California Department of Fish and Wildlife shall be consulted prior to any eviction or other action. If avoidance or postponement is not feasible, a Bat Eviction Plan will be submitted to California Department of Fish and Wildlife for written approval prior to project implementation. A request to evict bats from a roost includes details for excluding bats from the roost site and monitoring to ensure that all bats have exited the roost prior to the start of activity and are unable to re-enter the roost until activity is completed. Any bat eviction shall be timed to avoid lactation and young-rearing. If bats are found roosting during the nursery season, they shall be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 50-foot buffer zone (or different size if determined in consultation with the California Department of

Fish and Wildlife) shall be established around the roosting site within which no construction activities including tree removal or structure disturbance shall occur until after the nursery season.

Implementation of this mitigation measure would reduce the potential significant impact to special-status bat species to a less-than-significant level by requiring pre-construction surveys for bats and potential roosting sites and, if found, avoiding any disturbance.

San Joaquin Kit Fox. The San Joaquin kit fox is a federally-listed endangered species and a state-listed threatened species. The present range of the San Joaquin kit fox extends from the southern end of the San Joaquin Valley, north to Tulare County, and along the interior Coast Range valleys and foothills to central Contra Costa County. San Joaquin kit foxes typically inhabit annual grasslands or grassy open spaces with scattered shrubby vegetation but can also be found in some agricultural habitats and urban areas. This species needs loose-textured sandy soils for burrowing, and they also need areas that provide a suitable prey base, including black-tailed hare, desert cottontails, and California ground squirrels, as well as birds, reptiles, and carrion.

According to the CDFW, kit foxes have become established in urban settings of the Central Valley, such as Bakersfield, Taft, and Coalinga (Harrison et. al 2011). When kit foxes have easy access to trash and pet food, they often lose fear of people and urban environments. Observations of this species have been documented approximately 3.4 miles to the northwest of the project site (Occurrence No. 1014, CNDDDB 2022) and approximately 3.3 miles to the northeast of the project site (Occurrence No. 1013, CNDDDB 2022).

The likelihood of this species occurring on the project site is considered low. Loss of or harm to individual kit foxes could result if they are present on the site or seek shelter during construction within artificial structures, such as stored pipes or exposed trenches. Loss or harm to San Joaquin kit fox is considered a significant adverse impact. Implementation of the following mitigation measure would reduce the potential impact to San Joaquin kit fox to a less-than-significant level.

Mitigation Measures

BIO-3 Prior to ground disturbance, a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of special-status species potentially occurring in the project vicinity, including, but not limited to, San Joaquin kit fox, special-status bats, and nesting birds and raptors. Their habitats, general measures that are being implemented to conserve species as they relate to the project, and the boundaries within which disturbance activities will occur will be explained. Informational handouts with photographs clearly illustrating the species' appearances shall be used in the training session. All new construction personnel shall undergo this mandatory environmental awareness training.

The qualified biologist will train biological monitors selected from the construction crew by the construction contractor (typically the project foreman). Before the start of work each day, the monitor will check for animals under any equipment such as vehicles and stored pipes within active disturbance areas. The monitor will also check all excavated steep-walled holes or trenches greater than one foot deep for trapped animals. If a special-status species is observed within an active disturbance area, the qualified biologist will be notified immediately and all work within 50 feet of the individual will be halted and all equipment turned off until the individual has left the disturbance area.

The City of Greenfield Community Development Department shall document evidence of completion of this training prior to ground disturbance.

BIO-4 The U.S. Fish and Wildlife Service *Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011) shall be implemented prior to initiation of and during any construction activity on the project site to avoid unintended take of individual San Joaquin kit foxes.

Preconstruction/pre-activity surveys for San Joaquin kit fox shall be conducted no less than 30 days prior to the beginning of ground disturbance and/or construction activities or any project activity that may impact San Joaquin kit fox. The surveys shall include all work areas and a minimum 200-foot buffer of the project site. The preconstruction surveys shall identify kit fox habitat features on the project site, evaluate use by kit fox and, if possible, assess the potential impacts of the proposed activity. The status of all dens shall be determined and mapped.

If a natal/pupping den is discovered within the project area or within 200 feet of the project boundary, the applicant shall consult with the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service to establish an appropriate avoidance buffer. The avoidance buffer shall be maintained until such time as the burrow is no longer active and/or an incidental take permit is determined to be required and is obtained.

In addition, the following measures shall be observed:

- a. Project-related vehicles shall observe a 20-mph speed limit in all project areas; this is particularly important at night when kit foxes are most active. To the extent possible, night-time construction shall be minimized. Off-road traffic outside of designated project area shall be prohibited.
- b. To prevent inadvertent entrapment of kit foxes or other animals during the construction phase of the project, all excavated, steep-walled holes or trenches more than two feet deep shall be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped animals. If at any time a trapped or injured kit fox is discovered, the procedures under number 11 of the Construction and Operational Requirements in the Standardized Recommendations must be followed.

- c. Kit foxes are attracted to den-like structures such as pipes and may enter stored pipe becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of four inches or greater that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the U.S. Fish and Wildlife Service has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity, until the fox has escaped.
- d. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in closed containers and removed at least once a week from a construction or project site.
- e. No firearms shall be allowed on the project site during construction activities.
- f. To prevent harassment, mortality of kit foxes or destruction of dens by dogs or cats, no pets shall be permitted on site during construction activities.
- g. Use of rodenticides and herbicides on the project site during construction shall be restricted. This is necessary to prevent primary or secondary poisoning of kit foxes and the depletion of prey populations on which they depend. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and Federal legislation, as well as additional project-related restrictions deemed necessary by the U.S. Fish and Wildlife Service. If rodent control must be conducted, zinc phosphide shall be used because of proven lower risk to kit fox.
- h. In the case of trapped animals, escape ramps or structures shall be installed immediately to allow the animal(s) to escape.
- i. Any contractor, employee, or agency personnel who inadvertently kills or injures a San Joaquin kit fox shall immediately report the incident to the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service.

Implementation of this mitigation measure would reduce the potential significant impact to San Joaquin kit fox to a less-than-significant level by requiring pre-construction surveys for kit fox and the implementation of avoidance, minimization, and mitigation measures should they be found on the project site.

Furthermore, the applicant shall retain a qualified biologist to present the importance of following best management practices to reduce impacts to possible San Joaquin kit fox (as well as other sensitive species) during project implementation. A fact sheet conveying this information shall be prepared by the biologist and distributed to any personnel who may enter the project site. Should a kit fox be found onsite, the biologist shall be notified

immediately in order to outline additional avoidance measures that should be implemented as well as consult with regulatory agencies.

- b. **Riparian Habitat or Sensitive Natural Communities.** There are no riparian habitats or sensitive natural communities at the project site.
- c. **Waters of the United States.** A review of the National Wetlands Inventory online database was conducted to identify potential jurisdictional aquatic features on or adjacent to the project site (USFWS 2022). No potentially jurisdictional aquatic features occur on or adjacent to the project site. The Salinas River is approximately 1.5-miles to the northeast.
- d. **Wildlife Movement.** Terrestrial species must navigate a habitat landscape that meets their needs for breeding, feeding and shelter. Natural and semi-natural components of the landscape must be large enough and connected enough to meet the needs of all species that use them. Wildlife movement corridors provide connectivity between habitat areas, enhancing species richness and diversity, and usually also provide cover, water, food, and breeding sites.

The project site is not located within any previously defined essential connectivity areas and is also adjacent to existing developed areas (CDFW 2022). The project site is not likely to facilitate major wildlife movement due to current active disturbance. As such, the proposed project would have a less-than-significant impact on wildlife movement.

- e. **Local Biological Resource Policies/Ordinances.** The City of Greenfield General Plan, adopted in 2005, has goals in place for conserving local biological resources. The Conservation, Recreation, and Open Space Element provides direction regarding the protection and enhancement of agricultural resources, biological resources, historic and cultural resources, recreation and open space resources, and scenic resources in and around Greenfield.

Mitigation measures contained in this section will mitigate impacts to biological resources to a less-than-significant level. With these considerations, the proposed project would not conflict with local regulations related to biological resources.

Trees. The proposed project includes the removal of approximately 22 mature trees (Apple Avenue Subdivision Demolition Plan) and the replanting of 54 trees per the City of Greenfield “City Street Trees” list (Apple Avenue Subdivision Conceptual Street Tree Plan). There will be a net gain of 19 trees, with native, drought-tolerant trees replacing primarily ornamental trees. The proposed trees would comply with the City’s standards and regulations relating to the planting and removal of trees; therefore, there would be no impact related to the project conflicting with a tree preservation policy or ordinance.

- f. **Conservation Plans.** There are no critical habitat boundaries, habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans applicable to the proposed project site.

5. CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Analysis:

This section is based on the *Cultural Resources Inventory Survey at 296 Apple Road, Greenfield, Monterey County, California* (archaeological report) prepared by Cultural Resource Management Services on July 21, 2021. The report also included a Northwest Information Center archival record search and Native American Heritage Commission, Sacred Lands File Request. The results of the Northwest Information Center archival record search concluded that no prehistoric archaeological sites had been recorded within the search area and only one cultural resources investigation had taken place within the one-half mile search area.

The Sacred Lands File Request results were negative. Two tribes replied to the request for information letters: the Xolon Salinan Tribe and the Salinan Tribe of Monterey and San Luis Obispo Counties. The Xolon Salinan Tribe wished to be informed if any cultural activities were observed. The Salinan Tribe of Monterey and San Luis Obispo Counties wished to be informed if the Phase I Investigation resulted in any information.

- a. The 2021 report identified one residence on the parcel of land that was built in the 1930s, but the noted that the structure did not meet the Secretary of Interior Standards for historic significance.
- b. The 2021 report noted that when the survey was conducted portions of the parcel had been disked, but that mineral soil visibility was good throughout the parcel of land. In addition, back dirt from a rodent hole was also examined. The survey concluded that no cultural materials, including prehistoric artifacts, features, or darken soil was discovered during the survey. Nonetheless, General Plan Program 7.6.A would be included as a standard condition of approval for the project and would ensure that cultural resources are adequately protected should unanticipated and unknown resources be uncovered during construction activities. Implementation of the following standard conditions of approval would reduce this potential, significant impact to a less than significant level.

Standard Condition of Approval

- If, during the course of construction, cultural, archaeological, historical, or paleontological resources are uncovered at the site (surface or subsurface resources), work shall be halted immediately within 50 meters (165 feet) of the find until a qualified professional archaeologist can evaluate it. The Public Works Director and a qualified archaeologist (i.e., an archaeologist registered with the Society of Professional Archaeologists) shall be immediately contacted by the responsible individual present on-site. When contacted, the Public Works Director and the archaeologist shall immediately visit the site to determine the extent of the resources and to develop proper mitigation measures required for the discovery.

In addition, it is standard practice that in the unlikely event of such discovery, all significant prehistoric cultural materials and or tribal cultural resources recovered shall be returned to Native American tribes traditionally and culturally affiliated with the area.

- c. The 2021 report did not note the presence of any human remains. Nonetheless, ground disturbing activities associated with the proposed project could damage or destroy previously undiscovered human remains including Native American human remains. The City includes a standard condition of approval for notification to the County Coroner in compliance with Section 7050.5 of California's Health and Safety Code if any human remains are uncovered. This same standard condition of approval requires implementation of the procedures outlined in CEQA Section 15064.5 (d) and (e) if the remains are determined to be Native American. With the incorporation of the City's standard conditions of approval regarding actions to take in the event of encountering human remains during grading activities would ensure potential impacts are less than significant.

Standard Condition of Approval

- In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of Monterey County has determined whether the remains are subject to the coroner's authority. This is in accordance with Section 7050.5 of the California Health and Safety Code. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission within 24 hours of identification. Pursuant to Section 5097.98 of the Public Resource Code, the Native American Heritage Commission will identify a "Native American Most Likely Descendent" to inspect the site and provide recommendations for the proper treatment or disposition of the remains and any associated grave goods.

6. ENERGY

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Analysis:

- a. Energy impacts are assessed based on the proposed project energy demand profile and on its relationship to the state’s energy efficiency regulations and the City’s land use planning regulations. Both are summarized below.

Projected Energy Use

A summary of projected energy demand is provided below.

Electricity. According to the California Energy Commission Energy Consumption Data Management System, in 2020, total electricity consumption in Monterey County was 2,434,272,857 kilowatt-hours (kWh). Section 5.3, Energy by Land Use – Electricity, in the project CalEEMod results included in [Appendix B](#) show that projected electricity demand would be zero. This owes to regulatory requirements included in the California Energy Code, Building Energy Efficiency Standards. These standards are summarized below and include the incorporation of onsite solar panels to offset electrical demand. The 2019 standards require that single-family and low-rise residential development be constructed to require net zero electricity demand.

Natural Gas. According to the California Energy Commission Energy Consumption Data Management System, in 2020, total natural gas consumption in total natural gas consumption in Monterey County was 110,009,822 therms. Section 5.2, Energy by Land Use – Natural Gas, in the project CalEEMod results included in [Appendix B](#) show that projected natural gas demand would be about 958,663,000 BTU per year or approximately 9,587 therms per year. This is less than one-tenth of one percent of countywide demand in 2020. Furthermore, following the submittal of the planning applications, the applicant has indicated that the development would not include natural gas appliances or heating and is requesting that the City allow them to omit natural gas laterals serving the residences in the subdivision. As such, the project’s natural gas demand would be zero (0) therms.

Transportation Fuel. The analysis of vehicle miles traveled (VMT) in Section D.17, Transportation, concludes that the proposed project would have a less-than-significant VMT impact. This owes primarily to the fact that affordable housing projects are deemed to reduce the distances that residents need to travel to access employment opportunities. Therefore, by its design, the project is expected to reduce automobile use and associated fuel usage relative to existing conditions.

Regulatory Requirements

A multitude of state regulations and legislative acts are aimed at improving vehicle fuel efficiency, energy efficiency, and enhancing energy conservation. For example, the Pavley I standards focus on transportation fuel efficiency. The gradual increased use of electric cars powered with cleaner electricity will reduce consumption of fossil fuel. Vehicle miles traveled are expected to decline with the continuing implementation of Senate Bill 743 (Pub. Resources Code, § 21099; CEQA Guidelines, § 15064.3), resulting in less vehicle travel and less fuel consumption. In the renewable energy use sector, representative legislation for the use of renewable energy includes, but is not limited to, Senate Bill 350 and Executive Order B-16-12. In the building energy use sector, representative legislation and standards for reducing natural gas and electricity consumption include, but are not limited to, Assembly Bill 2021, CALGreen, and the California Building Standards Code.

The California Building Standards Code is enforceable at the project-level. The California Energy Code (California Code of Regulations, Title 24, Part 6), which is incorporated into the California Building Standards Code, was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The California Energy Code is updated every three years by the California Energy Commission as the Building Energy Efficiency Standards to allow consideration and possible incorporation of new energy efficiency technologies and construction methods. California's energy code is specifically designed to reduce wasteful and unnecessary energy consumption in newly constructed and existing buildings, including residential buildings. For residential uses of the type proposed, the standards require a suite of building energy efficiency requirements, combined with on-site renewable energy production, that ensure such uses have net zero electricity energy demand.

The Green Building Standards Code (also known as CALGreen), which requires all new buildings in the state to be more energy efficient and environmentally responsible, was most recently updated in July 2022. These comprehensive regulations are intended to achieve major reductions in interior and exterior building energy consumption.

A project could be considered to result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption of energy if its energy demand is extraordinary relative to common land use types, its gross energy demand is excessive relative to total demand in Monterey County, and/or it fails to comply with energy efficiency/conservation regulations that are within the applicant's control. The project is a common land use type that is consistent with the General Plan and is planned for an infill site. From a land use perspective, infill development can result in lower VMT and lower transportation fuel demand – which is the case for the proposed project. The project energy demand would not be excessive relative to total demand and residential

development is not an inherent source of wasteful energy demand. The project applicant would be required to comply with the primary state regulatory requirements for reducing building energy demand found in Title 24 of the current California Building Code, and with CALGreen requirements as described above. The proposed project would consume energy, but it would not be inefficient, wasteful, or unnecessary. Therefore, the impact would be less than significant.

- b. There are no regulations at the state or local level that would mandate that the proposed project must include on-site renewable energy sources at this time. The California Building Standards Code would require the proposed project to be built to the Building Energy Efficiency Standards in effect at the time the building permit is issued. By incorporating energy efficiency and renewable energy measures per the Building Energy Efficiency Standards, and incorporating green building features per the CALGreen standards, the project would comply with existing state and local energy standards and would not conflict with or obstruct a state or local plan for energy efficiency.

7. GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(3) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Analysis:

The analysis presented below has been written against the backdrop of CEQA case law addressing the scope of analysis required for potential impacts resulting from existing environmental hazards found at the site or in the vicinity of a site for a proposed project. In *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62

Cal.4th 369, 377, the California Supreme Court held that “agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project’s future users or residents” (italics added). The court reasoned that “ordinary CEQA analysis is concerned with a project’s impact on the environment, rather than with the environment’s impact on a project and its users or residents” (Id. at p. 378).

The court did not hold, however, that CEQA never requires consideration of the effects of existing environmental conditions on the future occupants or users of a proposed project. But the circumstances in which such conditions may be considered are narrow: “when a proposed project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project’s impact on the environment—and not the environment’s impact on the project—that compels an evaluation of how future residents or users could be affected by exacerbated conditions” (Id. at pp. 377-378, italics added).

The information provided in this section largely comes from the *Geotechnical Investigation Report Proposed Residences 296 Apple Ave (APN 109-082-013-000) Greenfield, California* (“geotechnical report”) prepared by Pacific Coast Testing on July 28, 2021. The full geotechnical report can be found in [Appendix D](#).

- a. **Fault Rupture.** The nearest Alquist-Priolo Earthquake Fault Zone is located over 13 miles northeast from the project site (California Department of Conservation 2022) and the nearest mapped fault, the Rinconada Fault, is located approximately five miles to the southwest (Pacific Coast Testing 2021). Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault.

Seismic Ground shaking. The nearest Alquist-Priolo Earthquake Fault Zone is located over 13 miles northeast from the project site (California Department of Conservation 2022), and the nearest mapped fault, the Rinconada Fault, is located approximately five miles to the southwest (Pacific Coast Testing 2021). An earthquake of moderate to high magnitude along these faults could cause considerable seismic ground shaking at the project site, potential damage to project improvements, and risk to public safety if improvements are not constructed consistent with seismic safety standards.

General Plan Policy 8.1.1 requires that existing and new buildings, structures, and walls within the City meet minimum seismic safety standards and General Plan Policy 8.1.4 requires that all new buildings, structures, and walls shall conform to the latest seismic and geologic safety structural standards of the California Building Code. Implementation and compliance with these General Plan policies would ensure that seismic hazards risks are less than significant.

Liquefaction. A preliminary evaluation of the site’s susceptibility to liquefaction is provided in the geotechnical report and determined the potential for liquefaction onsite to be in the low category due to the type of soils and level of groundwater found (p. 4). In addition, the California Department of Conservation’s interactive web mapping does not

indicate the City to be within a liquefaction potential zone (California Department of Conservation 2022). Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction.

Landslide. In addition to the project site's topography being relatively flat, the California Department of Conservation's interactive web mapping does not indicate the City to be within a landslide potential zone (California Department of Conservation 2022). Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

- b. The proposed project includes grading activities that would result in the disruption, displacement, compaction, and overall covering of the site soils. The geotechnical report indicates that the site has no visual evidence of overall instability, but shallow erosion of the onsite silty sands could occur if over-saturated conditions were to occur (p. 5).

According to the General Plan EIR, erosion resulting from buildout of the General Plan can be successfully controlled and prevented using a variety of methods including implementation of all policies and programs within the General Plan under Drainage Facilities. These policies and programs require that drainage and erosion control plans be submitted for new development and shall be reviewed by the City Building and Development Engineering Departments for compliance with all state-mandated codes and laws (City of Greenfield 2005a, p. 10-46). Development of the project would disturb more than one acre of soil and, as discussed in Section 10, Hydrology and Water Quality, checklist question "a," the State NPDES General Construction Permit requires development and implementation of a storm water pollution prevention plan that uses storm water Best Management Practices to control runoff, erosion, and sedimentation from the site both during and after construction. Therefore, the proposed project is required to comply with the following standard conditions of approval.

Standard Conditions of Approval

- If grading shall affect more than one acre, the project applicant shall file a Notice of Intent (NOI) and submit a Storm Water Pollution and Prevention Plan (SWPPP) to the Regional Water Quality Control Board (RWQCB). The SWPPP shall be developed in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Order No. 2009-0009-DWQ NPDES No. CAS000002 as amended by Order No. 2012-0006-DWQ. This shall be accomplished prior to site grading and development.
- The project applicant shall prepare an Erosion and Sediment Control Plan for review and approval by the Public Works Director and City Engineer. The Plan shall include appropriate site-specific construction site Best Management Practices (BMPs); the rationale used for selecting BMPs including supporting soil loss calculations, if necessary; features and facilities to ensure runoff is treated before leaving the site and an evaluation of the feasibility of storage for later use; list

applicable permits directly associated with the grading activity including, but not limited to, any permits required by the State Water Board, U.S. Army Corps of Engineers, and California Department of Fish and Game along with documentation that the required permits have been obtained prior to commencing any grading activity; and drawings and specifications necessary to implement the Plan.

Further, all development must comply with the Greenfield Municipal Code, which specifies a series of specific measures to avoid impacts from erosion, runoff, loss of topsoil, winter operations, revegetation and maintenance. Implementation and compliance with City standard conditions of approval and Greenfield Municipal Code would ensure that potential impacts from soil loss and loss of topsoil are less than significant.

- c. The geotechnical report indicates that the site has no visual evidence of overall instability and has negligible potential for lateral spreading displacements due to the near-level terrain (p. 5). As identified in checklist question “a,” the project site is not identified on the California Department of Conservation’s liquefaction or landslide hazard zones. Therefore, the proposed project is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. There would be no impact related to unstable soil.
- d. According to the geotechnical report, the near surface gravelly silty sands have very low expansivity. Therefore, the proposed project would not be located on expansive soil, creating substantial direct or indirect risks to life or property. There would be no impact related to expansive soils.
- e. The proposed project would connect with the City’s existing sanitary sewer system and would not utilize septic systems. Therefore, there would be no impacts related to soil inadequacy for septic use.
- f. The topographically flat project site does not contain unique geologic features. According to the General Plan, there have been few archaeological or paleontological finds in the region (p.7-45) and the General Plan EIR indicates that the archeological sensitivity of the City is generally low (p. 10-43). However, discovery of unknown buried paleontological resources during site preparation and construction activities remains possible. Damage to significant paleontological resources would be considered a significant adverse environmental impact.

Greenfield General Plan Program 7.6 A requires that the Planning Department be notified immediately if any prehistoric, archaeological, or paleontological artifact is uncovered during construction. All construction must stop and an archaeologist that meets the Secretary of the Interior’s Professional Qualifications Standards in prehistoric or historical archaeology must be retained to evaluate the finds and recommend appropriate action. This policy is implemented as a standard City condition of approval for all projects involving grading activities, and as such would be applied to this project (refer back to Section 5.0, Cultural Resources, checklist question “b” for the full language

of this standard condition). Incorporation of this standard condition of approval would ensure that paleontological resources are adequately protected should unanticipated and unknown resources be uncovered during construction activities. Potential impacts would be less than significant.

8. GREENHOUSE GAS EMISSIONS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Analysis:

- a. The City of Greenfield has not adopted a plan for reducing greenhouse gas emissions (GHG) or a threshold of significance for GHGs. The Monterey Bay Air Resources District (“MBARD”) has not developed or adopted a threshold of significance for GHGs from land use development projects, such as the proposed project. In light of the absence of local or regional GHG threshold guidance, the impact analysis methodology described below is used.

Analysis Methodology

The significance of GHG emissions from the proposed project is evaluated based on a methodology which examines mobile source emissions separately from the balance of GHG emissions sources. This methodology looks first at mobile source emissions in the context of vehicle miles travelled (VMT) generated by the project and a quantified threshold of significance for this emissions source as recommended by the California Office of Planning and Research. GHG emissions from other project sources (e.g., electricity, area sources, water, wastewater) are quantified and qualitatively compared to values derived by modifying quantified thresholds of significance crafted by two adjacent air districts.

This “bifurcated” analysis approach is supported by several published sources. These include: 1) California Office of Planning and Research’s *Discussion Draft CEQA and Climate Change Advisory* (December 2018), which discusses CEQA streamlining for GHG impacts by examining VMT effects (mobile source emissions) separately from energy and natural gas sources; 2) California Office of Planning and Research’s *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018), which provides guidance on evaluating VMT impacts that affect the state’s ability to meet its long-term climate goals; and 3) Association of Environmental Professionals’ *Final Whitepaper - Beyond 2020 and Newball: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California* (October 2016), which identifies two hybrid analysis concepts using Senate Bill 375 and Senate Bill 743 that each evaluate transportation (mobile source) GHG emissions separately from non-mobile sources.

Senate Bill 375 was enacted in 2008. Its overall purpose is to reduce GHGs from passenger vehicles by setting regional emissions targets with which local communities can align their land use and transportation policies to help achieve. Senate Bill 743, enacted in 2013, is designed to help achieve state climate policy and sustainability goals. (See Pub. Resources Code, § 21099; CEQA Guidelines, § 15064.3.) It eliminates traffic delay as an environmental impact under CEQA and instead, requires an assessment of VMT as a basis to encourage development that reduces VMT and associated mobile source GHG emissions.

VMT and Mobile Source GHG Emissions. VMT impacts of the project are discussed in Section D.17, Transportation. The VMT analysis included in the *Traffic and Circulation Study for the 296 Apple Avenue Residential Project*, more fully described in that section, concludes that the VMT impact is less than significant. This conclusion is based on guidance provided by the California Office of Planning and Research for implementing California Senate Bill 743. That guidance states that VMT impacts from affordable residential development may be presumed to be less than significant. Please refer to the traffic and circulation study in [Appendix F](#) for more information. Given that the project VMT impact is less than significant, the mobile source GHG emissions the project generates can also be assumed to have a less than significant impact.

Non-Mobile Source GHG Emissions. GHG emissions from construction and operation of the proposed project were estimated using CalEEMod. The detailed CalEEMod modeling results are included as [Appendix B](#).

Construction activity, including operation of off-road construction equipment, would generate approximately 266.48 metric tons of carbon dioxide equivalent (MT CO_{2e}) per year. To account for the contribution of construction emissions to the project’s non-mobile source annual emissions profile, construction emissions are amortized over an assumed 30-year operational timeframe; amortized annual emissions equal 8.88 MT CO_{2e} per year.

Project operations would generate GHG emissions from energy use (electricity), natural gas use (area source), waste generation, and water use. Projected mitigated emissions from these sources are summarized in [Table 3, Non-Mobile Mitigated Operational GHG Emissions](#). Refer to Section 2.2, Mitigated Operational, of the CalEEMod results for the proposed project included in [Appendix B](#) for reference to these emissions volumes.

Table 3 Non-Mobile Unmitigated Operational GHG Emissions

Emissions Sources	GHG Emissions (MT CO _{2e})
Area	36.75
Energy	51.46
Waste	5.70
Water	3.56
Amortized Construction	8.88
Total	106.35

SOURCE: EMC Planning Group 2022

As previously noted, MBARD does not provide guidance for evaluating GHG impacts from land development projects. Consequently, MBARD has not developed a threshold of significance for such impacts. In the absence of this direction, thresholds of significance that were developed by two adjacent air districts – the Bay Area Air Quality Management District (BAAQMD) and the San Luis Obispo Air Pollution Control District (SLOAPCD) are used as reference for qualitatively assessing the relative magnitude of non-mobile source emissions from the proposed project. MBARD had previously suggested that using of the SLOAPCD guidance and thresholds is appropriate. The BAAQMD threshold is also referenced because it is more conservative.

BAAQMD provided guidance for assessing GHG impacts in its 2017 California Environmental Quality Act Air Quality Guidelines, and as part of that guidance, derived a bright line threshold of 1,100 MT CO₂e/year. SLOAPCD did the same in its 2012 CEQA Air Quality Handbook, and derived a bright line threshold of 1,150 MT CO₂e/year. The substantial evidence used by each agency to develop their respective thresholds is included their CEQA guidance documentation. The bright line thresholds were developed to guide new development within each district with the goal of meeting the state’s Assembly Bill 32 statewide GHG emissions reduction target of 20 percent below 1990 levels by 2020. Assembly Bill 32 was passed in 2006.

With the subsequent passage of Senate Bill 32 in 2016, the state set a deeper GHG reduction target of 40 percent below 1990 levels by 2030. Consequently, the bright line thresholds identified above are no longer valid after 2020. Reducing these bright line thresholds by an additional 20 percent, to 880 MT CO₂e/year and 920 MT CO₂e/year, respectively, would approximate bright line values of 40 percent below 1990 levels to meet the 2030 emissions reduction target. Neither agency has adopted these scaled down values as thresholds of significance, nor has MBARD or City adopted either value as such. Rather, as noted above, these values are being used to qualitatively assess the relative magnitude of non-mobile source emissions from the proposed project. The non-mobile source project emissions of 106.35 MT CO₂e/year are 12 percent and 11.5 percent of each scaled down value, respectively. The project emissions volume is substantially below both values, which indicates that the non-mobile source project emissions should not be considered to have a significant impact.

Given that neither the project mobile source GHG emissions or the non-mobile source emissions would be significant, the project would have a less-than-significant impact from generation of GHG emissions.

- b. As describe in checklist question “a” above, neither the City nor MBARD have adopted plans for reducing GHG emissions. Consequently, the significance of mobile source GHG impacts is evaluated in the context of state legislation embodied in SB 743, and the non-mobile source GHGs are evaluated in the context of scaled quantified thresholds of significance that had been adopted by adjacent air districts as part of their respective plans for reducing GHG emissions. Because the project impacts are less than significant based, the project would have no impact from conflict with regulations or plans for reducing GHG emissions.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or a public-use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Analysis:

- a. The proposed project is a residential subdivision that would not involve the transport, use, or disposal of hazardous materials. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- b. According to the *Geotechnical Investigation Report Proposed Residences 296 Apple Ave (APN 109-013-000) Greenfield, California* (“geotechnical report”) (Pacific Coast Testing 2021), the property has had some agricultural use prior to the mid-1990’s and has been vacant since that time. In addition, the City General Plan states that local soils may contain naturally

occurring asbestos (City of Greenfield 2005b). Additionally, according to the *Cultural Resource Inventory Survey at 296 Apple Road, Greenfield, Monterey County California [APN: 109-082-013]* (Cultural Resource Management Services 2021), the existing onsite residence was built in the 1930-1940s when asbestos and lead-based paint could have been used. Therefore, the demolition of the existing residence and grading of the site soils has the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The City's General Plan Policy 8.4.5 requires that new development evaluate the presence or absence of naturally occurring asbestos and mitigate any impacts. Therefore, the following mitigation would be required in order to reduce this potential significant, adverse impact to a less-than-significant level.

Mitigation Measure

- HAZ-1 The proposed project is required to prepare a Phase I Environmental Site Assessment to determine the presence, or lack of, hazardous materials on the project site. This report shall be prepared, reviewed, and approved by the City Community Development Department prior to the issuance of a grading permit.
- c. The proposed project is located within one-quarter mile of an existing school (Cesar Chavez Elementary located approximately 370 feet east of the project site). However, the project involves the construction of single-family residences and, therefore, would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school. See also "b" above.
 - d. The proposed project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, therefore, would not create a significant hazard to the public or the environment (California Department of Toxic Substances Control 2022).
 - e. The project site is not located within two miles of an airport.
 - f. The City utilizes the Monterey County Emergency Operation Plan and will, at some point, adopt their own Emergency Operation Plan (Jim Langborg, email message, July 13, 2022).

The proposed project is a residential subdivision and involves new public rights-of-way. However, the new public rights-of-way do not interfere with the access or use of the existing rights-of-way (Apple Avenue, 3rd Street, and Cardona Circle). The General Plan EIR does not discuss evacuation routes within the City or how buildout of the General Plan could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The project site developed with residential uses is consistent with the General Plan and has no elements proposed that could impair or interfere with any evacuation routes or

emergency response plans. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

- g. Refer to Section 20, Wildfire. The project site is not located within or near a state responsibility area or lands classified as very high fire hazard severity zones (CalFire 2022). Therefore, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

10. HYDROLOGY AND WATER QUALITY

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(1) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(3) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(4) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Analysis:

- a. **Water Quality.** Development of the project site could result in the discharge of non-point source automobile-related waste products from the driveways and public rights-of-way, as well as from construction activities into the City's existing storm water system located in 3rd Street.

The project would be required to comply with General Plan Goals 4.12 and 8.2 that address drainage facilities. Consistent with the policies and programs that implement

these goals, drainage and erosion control plans must be developed that identify Best Management Practices demonstrating control of erosion and water quality impacts during construction, for approval by the City.

The State Water Resources Control Board National Pollutant Discharge Elimination System (“NPDES”) Program was adopted to control and enforce storm water pollutant discharge reduction per the Clean Water Act. The Central Coast Regional Water Quality Control Board (“RWQCB”) issues and enforces the NPDES permits for discharges to waterbodies in Monterey County, including Greenfield.

The State NPDES General Construction Permit requires development and implementation of a storm water pollution prevention plan (“SWPPP”) that uses storm water Best Management Practices to control runoff, erosion and sedimentation from the site both during and after construction. The SWPPP has two major objectives: (1) to help identify the sources of sediments and other pollutants that affect the quality of storm water discharges; and (2) to describe and ensure the implementation of practices to reduce sediment and other pollutants in storm water discharges. If a project disturbs more than one acre of land during construction, such as the proposed project, the developer will be required to file a notice of intent to be covered under the NPDES General Permit for Storm Water Discharges Associated with Construction Activity for discharges of storm water from construction activities. The developer must propose control measures that are consistent with this permit and consistent with recommendations and policies of the local agency (i.e., City of Greenfield) and the regional board (i.e., Central Coast RWQCB).

The proposed project must also comply with Resolution No. R3-2013-003, Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast (California Regional Water Quality Control Board Central Coast Region 2013) as mandated by the regional board.

Because the City requires development of the project site to comply with local and state requirements for construction and storm water discharge, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality during construction or during project operations. Impacts would be less than significant.

- b. **Groundwater Supplies.** The City obtains all of its water supply from the Salinas Valley Groundwater Basin. The Salinas Valley Groundwater Basin consists of one large hydrologic unit comprised of four subareas: Upper Valley Subarea, Forebay Subarea, 180-Foot/400-Foot Subarea, and East Side Subarea. These subareas consist of three main vertically divided aquifers: 180-foot aquifer, the 400-foot aquifer, and the Deep Zone, which extends approximately 2,000 feet below land surface (Monterey County 2008, p. 4.3-32). Greenfield is located in the Forebay Subarea. The subareas have different hydrogeologic and recharge characteristics, but barriers to horizontal flow do not separate the subareas and allow water to move between them.

The project would demand approximately 10,385 gpd more than the amount of water that is demanded by the existing residential uses at the site. According to the *City of Greenfield Potable Water Distribution System Master Plan Update*, the City has deficient storage under both existing and future conditions. Therefore, the project would require the implementation of Mitigation Measures UTIL-1 and UTIL-2 in order to reduce impacts on the City's water supply to a less-than-significant level. Refer to Section 19, Utilities and Service Systems, checklist question "b" for details about the proposed project's water demand.

Groundwater Recharge. Development of the proposed project could potentially interfere with groundwater recharge by increasing the area covered by impervious surfaces. However, the proposed project includes an 11,279 square foot detention basin provided at the southwest corner of the site facing 3rd Street. The detention basin would detain stormwater runoff onsite and percolate into the Forebay Subarea, thereby allowing for groundwater recharge. Therefore, the proposed project would not interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

- c. **Erosion and Siltation.** Development activities associated with future development of the project site may lead to significant erosion and/or siltation. Refer back to Section 7, Geology and Soils, checklist question "b," for more detail. The General Plan EIR determined that erosion resulting from buildout of the General Plan can be successfully mitigated through implementation of Best Management Practices that demonstrate control of erosion during construction. The proposed project shall implement the standard conditions of approval outlined in Section 7.0, Geology and Soils, checklist question "b" in order to ensure impacts related to erosion during development of the proposed project reduces to a less-than-significant level.

Flooding. The conversion of the project site from largely undeveloped land, with one single-family residence and one mobile home, to the proposed 36 single-family residences would increase the amount of surface area impervious to water, thereby increasing storm water runoff and altering existing drainage patterns. Grading activities may also alter existing drainage patterns that could lead to localized flooding.

The proposed project would be required to comply with General Plan Policies 4.12.1 through 4.12.7, which encourage design, development, and maintenance of appropriate drainage facilities. As part of the project design and development review process, the applicant is required to prepare storm drainage improvement plans for the project (i.e., Stormwater Pollution Prevention Plans discussed in the condition of approval outlined in Section 7, Geology and Soils, checklist question "b"). Implementation of this standard condition of approval would ensure that the proposed project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

Runoff. According to the project's vesting tentative subdivision map, the project would connect into the existing drainage system on 3rd Street. The Stormwater Pollution

Prevention Plan, required by City standard conditions of approval, as discussed in Section 7.0, Geology and Soils, would outline how stormwater created onsite would be treated and directed towards the City's existing storm drainage system. The Storm Water Pollution Prevention Plan would also illustrate how Best Management Practices and low impact design measures would be implemented on the project site ensuring this impact would remain less than significant.

Flood Flows. As discussed under checklist question "d" below, the project is not located within any Federal Emergency Management Agency Flood Hazard Zones (FEMA 2022). Therefore, the impediment or redirecting of flood flows would not be of concern in relation to development of the project site.

- d. **Other Flood Hazards.** According to the General Plan, Greenfield is not located in a coastal area or near a large inland body of water and, therefore, is not subject to tsunamis or seiches. The General Plan EIR indicates that the City may be affected to a small degree by inundation resulting from the failure of either the Nacimiento or San Antonio Reservoir Dams; however, the City is not subject to dam failure inundation (City of Greenfield 2005a, p. 10-54). According to the Federal Emergency Management Agency, the project site is not located within any flood hazard zones (FEMA 2022). Therefore, no impacts would occur related to the risk of release of pollutants due to project inundation.
- e. **Water Quality Control Plan and Sustainable Groundwater Management Plan.** The Sustainable Groundwater Management Act is a State law requiring groundwater basins to be sustainable. The act enables eligible local agencies to form groundwater sustainability agencies, develop groundwater sustainability plans for designated basins in their jurisdiction by 2020, and achieve groundwater sustainability within 20 years of plan implementation.

The Arroyo Seco Groundwater Sustainability Agency is the groundwater sustainability Agency that includes areas within the City of Greenfield. The agency has a mission to develop a comprehensive groundwater sustainability plan by 2022. The *Arroyo Seco Area Groundwater Sustainability Plan Draft* was prepared on May 18, 2020. As of July 2022, a final document has yet to be adopted.

The proposed project is required via the State NPDES General Construction Permit to prepare a Storm Water Pollution Prevention Plan that would illustrate the project's implementation of onsite treatment control measures that would detain storm water runoff onsite and drain into the Forebay Subarea and to the City's existing storm drain system located in 3rd Street, thereby allowing for groundwater recharge. The project would also implement the City General Plan policies and ordinance discussed under checklist question "a" in order to reduce adverse impacts to groundwater recharge. However, as discussed under checklist question "b," the proposed project would result in an increased demand on groundwater supply when the City already has deficient storage under both existing and future conditions. Therefore, the project would require the

implementation of Mitigation Measures UTIL-1 and UTIL-2 in order to reduce impacts on the City's water supply and ensure that the project has less than significant impacts related to its conflict with the Plan.

As previously discussed, the City is under the jurisdiction of the Central Coast RWQCB, who adopted its *Water Quality Control Plan for the Central Coastal Basin* in June 2019. The project would not conflict with this document because of its compliance with the stormwater discharge regulations outlined in the NPDES General Construction Permit. The project would implement best management practices to protect the water quality of stormwater discharge before it reaches surface water or groundwater.

11. LAND USE AND PLANNING

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause any significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Analysis:

- a. The project site is located within the City’s urban development and the project involves the development area and is surrounded by existing residential uses on three sides, with a City park and Specific Plan area on the fourth (west) side. The project involves the development of 36 single-family residences on a property zoned for medium density residential development. The proposed project would not physically divide an established community, and there is no impact relative to dividing an established community.
- b. The proposed project involves the construction of residential uses at a site zoned, and designated in the General Plan, for Medium Density Residential. The proposed project’s subdivision would meet all required regulations and designs pursuant to the City’s Municipal Code Section 16.12.040, Residential Subdivisions and Chapter 16.20, General Design Standards, and would comply with the development standards for single-family residential development in Chapter 17.30 of the City’s Zoning Code.

Section 3, Air Quality, concluded that the population housed by the proposed project is consistent with General Plan residential land use densities and would not exceed the population projections upon which the air quality management emissions forecasts are based. Therefore, the proposed project would not conflict with or obstruct the AQMP.

There are no critical habitat boundaries, habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans applicable to the proposed project site. The proposed project is also consistent with the General Plan and, therefore, would not result in a significant impact on the habitat conservation plan.

As discussed in Section 8, Greenhouse Gas Emissions, neither the City nor MBARD have adopted plans for reducing GHG emissions. Because the project impacts are less than significant based, the project would have no impact from conflict with regulations or plans for reducing GHG emissions.

As concluded in Section 10, Hydrology and Water Quality, the proposed project would not conflict the adopted water quality control plan through its compliance with the stormwater discharge regulations outlined in the NPDES General Construction Permit. The project would implement best management practices to protect the water quality of stormwater discharge before it reaches surface water or groundwater. However, the project would result in the increased demand on groundwater supplies and, therefore, is required to implement Mitigation Measures UTIL-1 and UTIL-2 in order to reduce its impacts associated with the City's groundwater supply and its conflict with the adopted groundwater sustainability plan.

As discussed in Section 13.0, Noise, the proposed project, as mitigated, would not conflict with General Plan policies or municipal code requirements for reducing exposures to unacceptable noise due to construction.

Policy 3.2.3 of the City's General Plan Circulation Element states that a minimum acceptable service standard for intersections and roadways during peak periods is a level of service (LOS) C and LOS D when unavoidable and at identified locations. Section 17.0, Transportation, concluded that the study-area intersections with the proposed project were forecasted to operate at LOS B during AM peak hour and LOS B-C during the PM peak hour, which is consistent with General Plan Policy 3.2.3. According to the traffic study, cumulative conditions for intersection operations were concluded to operate at LOS D or better during peak hours, which meets the City's LOS D standard (p. 14). The proposed project would be required to contribute to the City's Traffic Improvement Fee Program to offset its incremental impact to the City's street network, but no mitigation would be required. Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system.

12. MINERAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land-use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Analysis:

- a-b. According to the City's General Plan EIR, the City is not located within any designated Mineral Resource Zones and, therefore, the project would not result in the loss of access to, or availability of, a known mineral resource that would be of value to the City, region, or state (City of Greenfield 2005a).

13. NOISE

Would the project result in:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive ground-borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public-use airport, expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Analysis:

The information in this section is taken from the *Acoustical Analysis 296 Apple Avenue Subdivision Greenfield, California WJVA Project No. 22-39* prepared for the proposed project by WJV Acoustics, Inc. on December 1, 2022 (WJV Acoustics 2022) (“acoustical analysis”). The acoustical analysis can be found in [Appendix E](#).

The City of Greenfield Noise Element of the General Plan establishes noise level criteria in terms of the L_{dn} metric. The L_{dn} (Day-Night Average Level) is the time-weighted energy average noise level for a 24-hour day, with a 10 dB penalty added to noise levels occurring during the nighttime hours (10:00 p.m.-7:00 a.m.). The L_{dn} represents cumulative exposure to noise over an extended period of time and is therefore calculated based upon annual average conditions.

The Noise Element establishes a land use compatibility maximum noise level criterion of 60 dB L_{dn} for exterior transportation noise exposure in outdoor activity areas of new residential developments. Outdoor activity areas generally include backyards of single-family residences and common use areas and individual patios or balconies of multi-family developments. The intent of the exterior noise level requirement is to provide an acceptable noise environment for outdoor activities and recreation. The Noise Element also requires that interior noise exposure attributable to exterior noise sources not exceed 45 dB L_{dn} . The intent of the interior noise level standard is to provide an acceptable noise environment for indoor communication and sleep.

The City's General Plan Noise Element also establishes noise level standards for non-transportation (stationary) noise sources. For residential land uses, such as the proposed project, the outdoor daytime equivalent energy sound level (L_{eq}) is 50 and the nighttime standards is 45 L_{eq} . The interior day and night standard is 35 L_{eq} .

- a. The dominant source of noise affecting the project site is vehicle traffic along 3rd Street, with additional sources of noise including agricultural activities, noise from U.S. Highway 101, and the occasional aircraft overflight.

Temporary Increase

Noise impacts associated with construction activities typically depend on the noise levels generated by the type of equipment in use, the duration of usage of the equipment, and the distance at which the equipment is used in respect to nearby sensitive receptors. Table VIII within the acoustical analysis provides typical construction-related noise levels at distances of 25 feet, 50 feet, and 100 feet. Extraordinary noise-producing activities (e.g., pile driving) are not anticipated, but construction noise would occur at eastern locations of the project site at distances of 50 feet or less from existing residences. Construction activities for the entire project site would occur for approximately two years.

Noise impacts occur when construction activities are implemented beyond the limited allowed hours of construction; therefore, construction noise is not considered to be a significant impact if construction is limited to daytime hours and construction equipment is adequately maintained and muffled. Pursuant to the City's Municipal Code Section 9.28.030-D, construction activities are permitted only between the hours of 7AM and 7PM Monday through Friday and between 9AM and 5PM on Saturday and Sunday; however, construction activities are typically further limited to no weekend or holiday work as a condition of approval on the project.

Temporary increases in ambient noise as a result of construction of the project would occur, but impacts would be less than significant because the project would be required to comply with the City's noise ordinance and the construction equipment is required to be properly muffled and maintained.

Permanent Increase

Exterior Noise: Exterior traffic noise exposure from vehicles on 3rd Street was calculated for existing and cumulative (future) conditions using the Federal Highway Administration Highway Traffic Noise Prediction Model and traffic data obtained from the project's transportation consultant. Traffic along Apple Avenue is not considered to be a significant source of noise within the project site due to low traffic volumes (WJV 2022, p. 7). The acoustical analysis determined that the noise exposures for existing and cumulative (future) traffic conditions for the closest proposed setbacks to 3rd Street were approximately 58 dB L_{dn} for both traffic scenarios. The acoustical analysis also analyzed the traffic from U.S. Highway 101 (located approximately 1,550 feet southwest of the

project site) and determined that the noise exposures for existing and future traffic conditions for the closest proposed setbacks to U.S. Highway 101 were approximately 56 dB L_{dn} and 58 dB L_{dn}, respectively.

The acoustical analysis combined the traffic noise exposure for both 3rd Street and U.S. Highway 101 in order to determine the overall project traffic noise exposure. It was determined that the existing traffic noise exposure was 60 dB L_{dn} and the cumulative (future) traffic noise exposure was 61 dB L_{dn}. Therefore, the future traffic noise exposure would exceed the City's 60 dB L_{dn} exterior noise level standard, which would be considered a potentially significant adverse impact.

However, the project includes a six-foot high concrete panel screening wall along the 3rd Street project roadway frontage (refer to Sheet A1.2 of the project plans for details). This proposed wall would reduce traffic noise exposure within individual backyards by approximately 6 dB resulting in a projected future exposure of approximately 55 dB L_{dn}, which is below the City's 60 dB L_{dn} exterior noise level standard (WJV Acoustics 2022, p. 11). Therefore, there would be no significant impacts related to the permanent increase in ambient noise levels due to exterior traffic noise exposure.

Interior Noise: The City's interior noise level standard is 45 dB L_{dn}. As identified previously, the project includes a six-foot high concrete panel screening wall along the 3rd Street project roadway frontage, which would provide exterior noise mitigation for first-floor construction only. According to the acoustical analysis, this six-foot high concrete panel screening wall would not provide acoustic shielding at second-floor receiver locations. The closest proposed homes to 3rd Street (and U.S. 101) would include one single-story home (Lot 6) and four two-story homes (Lot 7, Lot 14, Lot 15, and Lot 20). The two-story homes would provide additional acoustic shielding (noise attenuation) to the proposed homes located to the east and the homes located directly east of Lot 6 are all single-family construction. Therefore, the proposed homes on Lot 7, Lot 14, Lot 15, and Lot 20 would require air conditioning or mechanical ventilation in order to ensure that the windows and doors remain closed for sound insulation purposes. Exterior noise levels at all other proposed homes would be sufficiently attenuated by the proposed six-foot wall and/or the two-story construction homes located to their east (WJV Acoustics 2022, p. 11).

Implementation of the following mitigation would ensure that interior noise levels for the proposed project's two-story residences fronting 3rd Street would meet the City's standard.

Mitigation Measure

- N-1 The proposed homes on Lot 7, Lot 14, Lot 15, and Lot 20 must include air conditioning or mechanical ventilation so that windows and doors can remain closed for sound insulation purposes.
- b. Vibration from demolition and construction activities could be detected at the closest sensitive land uses (residences to the east), especially during movements by heavy

equipment or loaded trucks and during some paving activities. Table IX in the acoustical analysis provides typical vibration levels at distances of 25 feet, 100 feet, and 300 feet. These levels would not be expected to exceed any significant threshold levels for annoyance or damage as provided by Caltrans Transportation and Construction Vibration Guidance Manual (WJV Acoustics 2022, p. 13). According to the acoustical analysis, at project buildout, it is not expected that ongoing operational activities will result in any vibration impacts at nearby sensitive uses (p. 13). Therefore, the proposed project would not result in the generation of excessive ground-borne vibration or ground borne noise levels, and vibration related impacts are less than significant.

- c. The nearest airport to the project site is King City's Municipal Airport (Mesa Del Rey) located approximately nine miles southeast (Google Earth 2022). Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels.

14. POPULATION AND HOUSING

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Analysis:

- a. The proposed project could result in the increase of approximately 165 people to the population of Greenfield (36 residences x 4.58 persons per household) (California Department of Finance 2022). The project would also include the extension of Cardona Circle from the adjacent subdivision through the project site to 3rd Street and a new public right-of-way that will extend from Apple Avenue to intersect with Cardona Circle.

However, the proposed project is consistent with the City's General Plan land use designation and zoning and the site has no unusual characteristics that would preclude its anticipated development with residential uses. As the site is zoned for residential uses at a density that accommodates the proposed single-family residential development, the project would not induce substantial unplanned population growth either directly or indirectly.

- b. The project site currently contains one single-family residence and one mobile home. The proposed construction of 36 new residences would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. As the project does not displace substantial numbers of existing people or housing, the impact is less than significant.

15. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Analysis:

- a. The proposed project could result in the increase of approximately 165 people to the population of Greenfield (36 residences x 4.58 persons per household) (Department of Finance 2022). This population increase corresponds to a 0.84 percent increase in population in comparison to the existing population of 19,634 (California Department of Finance 2022) and would result in an incremental increase in demand on services provided by the Greenfield Fire Department.

The Greenfield Fire Department serves a 46 square-mile area from a single fire station located at 380 Oak Avenue in Greenfield and contracts with the Greenfield Fire Protection District for services to the surrounding unincorporated area. The Greenfield Fire Department employs 32 personnel and attempts to staff the fire engine with a minimum of four people at all times although the minimum requirement is three (Jim Langborg, email message, July 12, 2022). The Greenfield Fire Department has two Type 1 Fire Engines, one Type-6 Fire Engine, and one Command Vehicle; the Greenfield Fire Department will soon have one Type-1 water tender and an additional command vehicle (Jim Langborg, email message, July 12, 2022). Pursuant to the Fire Chief, the Greenfield Fire Department's goal response time is three to five minutes in the City and five to ten minutes in the surrounding unincorporated areas (Greenfield Fire Protection District boundary) depending on the location.

The General Plan identifies several policies that address fire services such as: Policy 4.4.2, which requires that new development pay its fair share of costs for new fire protection facilities and services; Policy 4.4.3, which states that during the project's environmental review, necessary upgrades to fire facilities and equipment should be identified; and

Policy 4.4.4, which requires that adequate fire and emergency service access be incorporated into circulation system design to maximize the effectiveness of existing and proposed fire protection facilities.

Additional policies are discussed by the General Plan to address general public services such as: Policy 4.1.2, which requires that new development or major modifications of existing development construct all necessary on- or off-site infrastructure and public services needed to serve the project in accordance with City standards; Policy 4.2.1, which states that development should only be permitted when financing mechanisms are in place or committed which assure that adopted performance standards for public facilities will be met; Policy 4.2.4, which requires that new development be responsible for its fair share of the cost of all public facilities and services it utilizes, based upon project demand for these facilities and services and reasonable nexus; and Policy 4.2.5, which requires that new development be responsible for all costs of upgrading existing public facilities, constructing new facilities or expanding services that are needed to serve the development.

The proposed project is required to comply with the above-mentioned General Plan policies; however, the Fire Chief indicated that his department can adequately serve the proposed project with no need for additional staff or the construction of new facilities as the project is only adding 165 people to the City's population (Chief Jim Langborg, email message, July, 12 2022). Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts.

- b. The proposed project could result in the increase of approximately 165 people to the population of Greenfield (36 residences x 4.58 persons per household) (Department of Finance 2022). This population increase would result in an incremental increase in demand on the services provided by the Greenfield Police Department.

The Greenfield Police Department is comprised of 23 sworn officers and six civilian employees. There are several vacancies in the Police Department, but several are in the pipeline; "our staffing should be coming up to the allocated positions in the near future" (Acting Chief Bill Mixer, email message, July 18, 2022).

The General Plan identifies several policies that address police services such as: Policy 4.5.2, which requires that new development be consistent with police protection standards and requirements; Policy 4.5.3, which requires that there are sufficient personnel and capital facilities to ensure adequate police protection and appropriate response times; and Policy 5.4.6, which requires that impact fees be calculated to ensure that each dwelling unit, business, and vacant parcel pays a fair share of the cost of police services. Additional policies are discussed by the General Plan to address general public services such as: Policy 4.1.2, which requires that new development or major modifications of existing development construct all necessary on- or off-site infrastructure and public services needed to serve the project in accordance with City

standards; Policy 4.2.1, which states that development should only be permitted when financing mechanisms are in place or committed which assure that adopted performance standards for public facilities will be met; Policy 4.2.4, which requires that new development be responsible for its fair share of the cost of all public facilities and services it utilizes, based upon project demand for these facilities and services and reasonable nexus; and Policy 4.2.5, which requires that new development be responsible for all costs of upgrading existing public facilities, constructing new facilities or expanding services that are needed to serve the development.

The proposed project is required to comply with the above-mentioned General Plan policies; however, the Acting Police Chief Mixer indicated that a new police facility was constructed in 2011 and has room to grow. Currently, the existing police facilities have the capacity to adequately serve the proposed project. “Our response times may suffer, but that would also depend on unforeseen circumstances such as an officer being sick. As a whole, we can provide the services” (Guillermo Mixer, email message, July 18, 2022). Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts.

- c. The proposed project could result in the increase of approximately 165 people to the population of Greenfield (36 residences x 4.58 persons per household) (Department of Finance 2022). This population increase would result in an incremental increase in demand on public school services provided by the Greenfield Union School District and South Monterey County Joint Union High School District.

The increase in students from the new residences in the proposed project would incrementally increase enrollment levels at Cesar Chavez Elementary School (located approximately 0.06 miles east of the project site), Verde Vista Middle School (located 1.2 miles southeast of the project site), and Greenfield High School (located approximately one mile south of the project site). [Table 4, Student Generation](#), outlines the anticipated number of additional students the proposed project could generate for each school district using a generation rate of four elementary and middle school students per three-bedroom unit for the Greenfield Union School District (Annette Mooneyham, email message, July 11, 2022) and 0.20 high school students per single-family residence for the South Monterey County Joint Union High School District (Sherrie Castellanos, email message, July 11, 2022).

Table 4 Student Generation

Proposed Project	Greenfield Union School District	South Monterey County Joint Union High School District	Total Students
36, 3-bedroom households	x 4 students per 3-bedroom household = 144 students	x 0.20 students per household = 8 students	152

SOURCE: (Annette Mooneyham, email message, July 11, 2022), (Sherrie Castellanos, email message, July 11, 2022)

NOTES: Totals are rounded up.

As identified in the table, the proposed project could result in the generation of approximately 144 students to the Greenfield Union School District and approximately eight students to the South Monterey County Joint Union High School District, for a total of 152 new students.

According to the Chief Business Officer for the Greenfield Union School District, Cesar Chavez Elementary School is near capacity, but there is room for additional students at Vista Verde Middle School. Ms. Mooneyham indicated that the Greenfield Union School District is close to the need for another school in Greenfield (Annette Mooneyham, email message, July 11, 2022). According to the Chief Business Official for the South Monterey County Joint Union High School District, Greenfield High School is currently operating at capacity (Sherrie Castellanos, email message, July 11, 2022).

In accordance with Senate Bill 50, the project developer would be required to pay development impact fees to both of the two school districts at the time of the building permit issuance. The two school districts would use collected funds towards new facilities to offset any impacts associated with new development. Pursuant to California Government Code Section 65996, payment of these fees is deemed to fully mitigate cumulative CEQA impacts of new development on school facilities. Therefore, payment of state-mandated impact fees would reduce any potentially cumulatively considerable environmental impacts by the project on school facilities to a less-than-significant level.

- d. The City's General Plan EIR evaluated the impact of buildout on recreational facilities and determined that buildout of the General Plan would result in less than significant impacts on recreational facilities with compliance and implementation of the policies listed within the Conservation, Recreation, and Open Space Element. The detailed policies and programs of the General Plan provide a coordinated approach to planning, financing, and constructing adequate park facilities.

The City has recently developed or improved six parks, including Patriot Park Soccer Fields, three Pocket Parks in Vintage Meadows Subdivision, Oak Terrace Pocket Park, and the three-acre Greenfield Community Park immediately west of the proposed project site. These parks were purchased, developed, and/or improved using a combination of City Parks development impact fees, City General Funds, and grant awards. The City also provides recreational programs for the community through the City's Recreation and Parks Department

The proposed project could result in the increase of approximately 165 people to the City's population thereby requiring 0.64 acres of parkland to offset the project's impacts on the City's existing recreational facilities. Although the proposed project includes an 11,279 square foot detention basin (or approximately 0.26 acres), pursuant to General Plan Policy 7.2.19, drainage areas that are also used for recreation uses are not counted towards a development's required park dedication, but can count toward open space requirements. In addition, given the targeted low-income affordability of the proposed

residences, a density bonus incentive is invoked to provide relief from the City's park and open space development standards. City staff support the requested relief from this park and open space development standard in part because of the existence of the Greenfield Community Park across 3rd Street from the proposed subdivision.

In addition, the proposed project is required to pay impact fees sufficient to meet the added demand for park facilities. These required impact fees would mitigate the project's adverse impacts on the City's existing recreational facilities and other public facilities to a less-than-significant.

- e. The proposed project could result in the increase of approximately 165 people to the population of Greenfield (36 residences x 4.58 persons per household) (Department of Finance 2022). This population increase would result in an incremental increase in demand on the community center and other public facilities. However, all development projects, including the proposed project, are required to pay development impact fees for these facilities (adopted by the City Council in 2001). Payment of this development impact fee would mitigate the proposed project's contribution to a cumulative physical impact that may occur with expansion of such facilities, should it be determined necessary.

16. RECREATION

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Analysis:

- a. Refer to a more detailed discussion of the project’s impacts on the City’s existing recreational facilities in Section 15, Public Services, checklist question “d.”

The proposed project would result in the small increase of the City’s population thereby incrementally increasing the use of existing neighborhood and regional parks as well as other recreational facilities. However, in addition to the project’s requested density bonus incentive allowing relief from the City’s parkland standards, the project would pay the requisite park development impact fees to offset the project’s adverse impacts on the City’s existing recreational facilities. The project site is designated for residential uses in the General Plan and the project’s payment of fees would reduce the project’s impacts on the increased use of recreational facilities to a less-than-significant level.

- b. Refer to checklist question “a,” above. The proposed project does not include recreational facilities that could be used to offset the project’s impacts on the City’s existing recreational facilities. However, payment of development impact fees would reduce this adverse impact to a less-than-significant level and, therefore, the project would not be required to construct or expand recreational facilities, which might have an adverse physical effect on the environment.

17. TRANSPORTATION

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Analysis:

The information from this section is sourced primarily from the *296 Apple Avenue Residential Project City of Greenfield, California Traffic and Circulation Study* (traffic study) prepared by Associated Transportation Engineers on July 6, 2021 ([Appendix F](#)). This traffic study was also peer reviewed by Hexagon Transportation Consultants on June 17, 2022, which concluded that the traffic study is adequate and that the conclusions and recommendations presented are appropriate and adequately mitigate any project impacts per local and CEQA requirements.

- a. Trip generation estimates were calculated for the proposed project using rates presented in the Institute of Transportation Engineers Trip Generation Manual and the project was estimated to generate 340 average daily trips with 27 trips occurring during the AM peak hour and 36 trips occurring during the PM peak hour.

Levels of service were calculated for the study-area intersections with the project. Studied intersections included the following:

- Walnut Avenue/U.S. 101 Southbound ramps;
- Walnut Avenue/U.S. 101 Northbound ramps; and
- Walnut Avenue/3rd Street.

Area intersections were forecasted to continue to operate at LOS B during the AM peak hour and LOS B-C during the PM peak hour with Existing plus Project traffic, which meets the City's LOS D operating standard. Therefore, the proposed project would be consistent with the City's adopted level of service standards.

Cumulative conditions were also forecasted for area intersection operations assuming traffic generated by the approved and pending development projects located in the study area. It was concluded that the study area intersections would operate at LOS D or better during the AM and PM peak hours with Cumulative and Cumulative plus Project traffic, which meets the City's LOS D standard. Therefore, the proposed project would be consistent with the City's adopted level of service standards under cumulative conditions.

The traffic study evaluated access to the project site and concluded that the new connections to 3rd Street and Apple Avenue would provide adequate sight distances for traffic entering and existing the site and that the project's traffic generation would generate relatively low traffic volumes. Driveways were forecasted to operate at LOS A-B. In addition, the traffic study analyzed the City's General Plan buildout traffic conditions, including full development of the Walnut Avenue Commercial Area Specific Plan, in order to determine the effects of the proposed project at the U.S. 101/Walnut Avenue interchange. The traffic study determined that the project would have a minor effect on vehicle delays and would not change the levels of service at the U.S. Highway 101/Walnut Avenue interchange.

The traffic study concluded that the study-area intersections are forecast to operate in the LOS B-C range with Existing plus Project and Cumulative plus Project traffic. Therefore, improvements to the study-area street network are not required since the forecasts meet the City's LOS D standard. The proposed project would be required to contribute to the City's Traffic Improvement Fee Program to offset its incremental impact to the City's street network (p. 17) and would also be required to pay regional traffic impacts fees collected by the Transportation Agency of Monterey County.

Based on the evaluations and conclusions of the traffic study, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system.

- b. Although recent legislation (Senate Bill 743) utilizes a vehicle miles traveled (VMT) metric to evaluate a project's potential to impact traffic. For land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact; however, the City has not yet adopted VMT thresholds of significance. Therefore, the traffic study used the California Governor's Office of Planning and Research's Technical Advisory on Transportation, which provides screening tools to determine when a project may have a significant VMT-related transportation impact. This screening tool concludes that affordable housing generates lower VMT than market rate housing. Providing affordable housing in infill areas is anticipated to shorten commutes by providing housing closer to where people work, thereby reducing the amount of travel in the area. With application of the State's screening tool for VMT-related transportation impacts, it is presumed that affordable housing units have a less than significant impact on VMT, absent substantial evidence to the contrary, and do not require further VMT analysis.

The proposed project includes the development of 36 affordable single-family residences. Therefore, the proposed project's impact on VMT-related transportation would be less than significant based on the adopted State thresholds.

- c. The proposed project includes an extension of Cardona Circle westward to 3rd Street to Cardona Circle and from Apple Avenue to the new connector street to Cardona Circle. These new public rights-of-way do not involve sharp curves or dangerous intersections. The proposed project as a residential subdivision also does not involve incompatible uses to the area. Therefore, the proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), and impacts related to transportation hazards are less than significant.

- d. The proposed project would comply with General Plan Policy 8.3.3, which requires that new development have adequate access for fire-fighting and emergency equipment. The proposed project involves a new 32-foot-wide alley that will serve the homes along this alley extending to 3rd Street where users would be protected by bollards; this alley will only be accessible for pedestrians, cyclists, and emergency vehicles. The project can also be accessed by emergency vehicles through the project's access points on 3rd Street, Apple Avenue, and Cardona Circle. The project would not result in inadequate emergency access, and impacts are less than significant.

18. TRIBAL CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Analysis:

- a. The City sent out an offer of consultation letter to the Ohlone/Coastonan-Esselen Nation Tribe on July 25, 2022. The Tribe has 30 days from receipt of the letter to respond and request consultation. At the time of initial study preparation, no response had occurred. Because the offer of consultation was not responded to, it is presumed that there are no significant tribal cultural resources in the project site.

In the unlikely event that cultural resources are encountered, outreach to the appropriate Native American tribal representatives would occur and implementation of the standard condition of approval outlined in Section 5.0, Cultural Resources, would be required to ensure that impacts related to tribal cultural resources are less than significant.

19. UTILITIES AND SERVICES SYSTEMS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Analysis:

- a. **Water.** The City owns and operates a water distribution system that is comprised of one distribution pressure zone, two potable water storage tanks, and two pump stations (City of Greenfield 2021a). The *City of Greenfield Potable Water Distribution System Master Plan Update* recommends that as development is proposed, an evaluation be completed to identify which of the recommended system upgrade projects are required to be completed to adequately serve the proposed development. As discussed in checklist question “b” below, the project would demand 11,055 gallons of water per day (or 0.01 million gallons of water per day); this amount makes up less than one percent of the total existing useable volume available in storage for the City (City of Greenfield 2021a, Table 6-1). Further, the *City of Greenfield Potable Water Distribution System Master Plan Update* does not identify deficiencies in the water infrastructure located adjacent to the project site. The nearest proposed improvements to the City’s water distribution facilities are on Oak Avenue between 3rd Street and 2nd Street (one-quarter of a mile southeast of the project

site). Therefore, the proposed project on its own would result in less than significant impacts associated with the need to expand existing or construct new water distribution facilities.

However, the City has been increasing its housing production, pursuant to state law, at a rapid pace. During the City's 5th cycle housing element period (2014-2023), the state required that the City reach 363 units. By the end of 2021, the City had reached 519 units, which surpasses the requirement by the state. Including issued building permits for new residential units through November 2022, the City's Building Division reports an additional 620 units across all income categories. The Greenfield Commons Multi-Family Residential Project is currently in the building permit review process and, if included, the City's total housing production across all income categories would be 840 units as of November 2022. This represents 231 percent of the state's required allocation for the City. This overage of 477 units built in the 5th cycle should be carried over and counted against the 6th cycle requirements.

Development of 477 units over the requirements of the state to provide housing in the City of Greenfield, and the proposed project in addition to other present and future development within the City would likely require the need to expand the existing water system to service all of the new development, the construction of which could cause significant environmental effects. The cumulative impacts of the proposed project and other development in the City are discussed in more detail in Section 21.0, Mandatory Findings of Significance, checklist question "b."

Wastewater. The City owns and operates a sewer collection system that is comprised of approximately 31 miles of gravity sewer pipes ranging in size from 4-inch to 24-inch diameter, and six lift stations (City of Greenfield 2021c). Figure 5-1 of the *City of Greenfield Wastewater Collection System Master Plan Update* illustrates that the sewer lines surrounding the project site are not operating at a deficient level under existing flow conditions. The nearest proposed improvements to the City's wastewater collection facilities are on Vineyard Drive, north of Nino Lane (approximately 0.20 miles southeast of the project site).

However, similarly with the water discussion presented above, the City's rapid housing production and exceedance of state housing allocation requirements present growing concerns for the City and its ability to serve the new development's wastewater needs. Development of the proposed project in addition to other present and future development within the City would likely require the need to expand the existing wastewater system to service all of the new development, the construction of which could cause significant environmental effects. The cumulative impacts of the proposed project and other development in the City are discussed in more detail in Section 21.0, Mandatory Findings of Significance, checklist question "b."

Storm Drainage. According to the General Plan, storm water drains to the east of the City where it is collected in retention ponds near the wastewater treatment plant. The City is not prone to extensive or regular flooding and new drainage needs are met by project

developers (City of Greenfield 2005b, p. 4-33) through implementation of local and state regulations (e.g., implementation of a SWPPP and best management practices, etc.).

The project would connect into the existing drainage system on 3rd Street and implement a Stormwater Pollution Prevention Plan, required by City standard conditions of approval. The Stormwater Pollution Prevention Plan would illustrate how best management practices and low impact design measures would be implemented on the project site ensuring that the proposed project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems resulting in the need to construct new or expand existing storm drainage facilities. Storm drainage at the project site is discussed in more detail in Section 10.0, Hydrology and Water Quality. The proposed project would not result in the need to construct new or expand existing storm drainage facilities.

Electric Power, Natural Gas, and Telecommunications. Pacific Gas and Electric provides the electricity and natural gas services and Pacific Bell provides the telecommunication services in the City (City of Greenfield 2005b, p. 4-34). Within the past few years, constraints on electrical and natural gas capacity in the southern Salinas Valley have occurred. However, as discussed in Section 6.0, Energy, the proposed project would result in zero electricity and natural gas demand. The project would require telephone service to the proposed residences, but it is assumed that telecommunication facilities already exist onsite for the existing residences. Therefore, the proposed project would not require the relocation or construction of electric power, natural gas, or telecommunication facilities.

- b. The City of Greenfield’s source of potable water is groundwater from the Salinas Valley Groundwater Basin and the project would connect into the City’s existing water system located in Apple Avenue and 3rd Street. Using the water demand factors from the *City of Greenfield Potable Water Distribution System Master Plan Update* (City of Greenfield 2021a), the project would demand 11,055 gpd [(165 people x 67 gpd/capita) or approximately 12.4 acre-feet per year. [Table 5, Existing and Proposed Water Use](#), below provides a breakdown of existing, individual residential water demand and water demand based on implementation of the proposed project.

Table 5 Existing and Proposed Water Use

Land Use	Persons	Water Factor	Water Demand
Existing Residential (<i>one single-family dwelling and one mobile home</i>)	10	67 gpd/person	670 gpd
Proposed Residential (<i>36 single-family dwellings</i>)	165		11,055 gpd
Increase			10,385 gpd

SOURCE: (Paul Davis Partnership 2021), (City of Greenfield 2021a), (Arturo Felix, email message, July 18, 2022)
 NOTES: Totals are rounded.

The above table illustrates that the proposed project would demand approximately 10,385 gpd more than the amount of water that is demanded by the existing residential uses at the site. Because the proposed project is consistent with the General Plan designation and zoning for the site, the site has been evaluated with medium density residential uses by the General Plan EIR and anticipated for these types of uses by the City. However, according to the *City of Greenfield Potable Water Distribution System Master Plan Update*, the City has deficient storage under both existing and future conditions (City of Greenfield 2021a, p. 6-2). Table 6-5 of the *City of Greenfield Potable Water Distribution System Master Plan Update* illustrates that the City is in a deficit of 1,672,000 gallons of water under existing conditions and at a deficit of 23,000 to 4,023,000 gallons of water under several different future conditions. Additional tanks are recommended to meet the City's minimum criteria. Therefore, the proposed project would not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

Municipal Code Chapter 13.09 outlines the City's mandatory water conservation regulations for the purpose of increasing public awareness of the need for water conservation and to provide regulations and restrictions on the delivery of water. Section 13.09.040.M outlines the water conservation regulations for new construction. The list of six restrictions identified in this section is required to be complied with by the developer of the proposed project. The City also adopted the *Greenfield California 2020 Water Shortage Contingency Plan* (City of Greenfield 2021) in August 2021, which was structured to dovetail with the City's Municipal Code Chapter 13.09 with the primary goal of significantly reducing water supply demands during times of drought and/or low water supply availability.

In addition to compliance with the abovementioned sections of the City Municipal Code, the proposed project is required to pay its fair share of development impact fees in order to offset its increased demand on an already deficit water supply storage system. The City's development impact fees are out of date and require updating in order for developments such as the proposed project to pay their fair share in assisting the City, in this case, with the cost to construct additional water storage tanks that are necessary in order for the City to meet its minimum water service needs.

Therefore, compliance with the City Municipal Code and implementation of Mitigation Measures UTIL-1 and UTIL-2 (presented in checklist question "c") would reduce the project's impact on the City's water supply system to a less-than-significant level.

- c. The proposed project would connect to the existing sanitary sewer line on Apple Avenue and 3rd Street. The City's wastewater treatment plant, located approximately one mile northeast of the City of Greenfield, has an existing capacity of 1.5 million gallons per day (mgd) with the most recently documented (2019) average annual flow of 0.99 mgd (City of Greenfield 2021b).

The City adopted its *City of Greenfield Wastewater Treatment Plant Master Plan – Final* on June 8, 2021, inclusive of a separate analysis by The Wallace Group for a reduced cost alternative, which addresses the City's increasing development and population and the

new permit requirements from the Regional Water Quality Control Board. The reduced cost alternative involves modular package plants that could be installed in phases to ease the capital cost burden while achieving full compliance with all regulatory permits. These improvements will allow the City to increase its capacity at the wastewater treatment plant from 1.5 mgd to 2.0 mgd, which will serve the City’s needs for the next 20 years and more (City of Greenfield 2022b). However, these improvements may not be built-out in time to serve the proposed project.

Table 6, *Wastewater Generation*, provides a comparison of the wastewater generated by the project site as it exists today (with one single-family residential unit) and with implementation of the proposed project.

Table 6 Wastewater Generation

	Persons	Factor	Wastewater Generation
Existing Onsite Residential Unit	0 ¹	60 gpd/person	0 gpd
Proposed Project	165		9,900 gpd
Increase			9,900 gpd

SOURCE: (Paul Davis Partnership 2021), (City of Greenfield 2021b), (Arturo Felix, email message, July 18, 2022)

NOTES:

1. According to the City’s Utilities System Assistant Superintendent, the existing single-family residence and mobile home on the project site do not currently connect into the City’s sewer system.

2. gpd = gallons per day

The existing single-family residence and mobile home on the project site are not currently connected to the City’s wastewater treatment plant and collection system. The proposed project would generate approximately 9,900 gpd of wastewater (or approximately 0.01 mgd of wastewater), which is an increase of approximately 9,900 gpd of wastewater than existing conditions since the existing residential uses utilize a private septic system and are not connected into the City’s sewer system (Public Works Operations Manager Arturo Felix, email message, July 18, 2022).

Although the City has been approved to increase its wastewater treatment plant’s capacity to 2.0 mgd, these upgrades have not yet been implemented and it is unknown if the improvements would be in place for use by the proposed project. Therefore, the wastewater treatment plant’s capacity, for the purpose of this analysis, is 1.5 mgd. The proposed project’s wastewater generation of 0.01 mgd would make up less than one percent of the existing capacity for the wastewater treatment plant. However, as discussed in the *City of Greenfield Wastewater Treatment Plant Master Plan – Final*, there are present limitations with the existing pond-based treatment processes and the treatment plant’s inability to comply with effluent standards presented within the Regional Water Quality Control Board’s adopted General Waste Discharge Requirements Order No. R3-2020-0020 (General Permit). Given the limitations that exist at the wastewater treatment plant, the project may result in a determination by the City that the wastewater treatment plant has inadequate capacity to serve the project’s wastewater demand in addition to its existing commitments.

Additionally, the City's substantial increase in housing and population influences the City's ability to adequately provide wastewater treatment services. The City is required by the State to increase its housing availability each year through its regional housing needs allocation, which contributes to the current need for the City's wastewater treatment plant upgrades. The expense for these upgrades is substantial. Development impact fees are charged by the City to an applicant in connection with approval of a development project. The purpose of these fees is to defray all or a portion of the cost of the public facilities related to the development project. The legal requirements for enactment of a development impact fee program are set forth in California Government Code Sections 66000-66025, the bulk of which was adopted as 1987's Assembly Bill 1600 (also known as the Mitigation Fee Act).

According to the City's Municipal Code Chapter 19.06, Sanitary Sewer Facilities Mitigation Fees, these impact fees were adopted in 2005 and are, therefore, outdated. In order for developments to truly pay their fair share of the cost of on- and offsite wastewater infrastructure, the City's development impact fees need to be updated.

Through compliance with Assembly Bill 1600, the re-evaluation and update of City development impact fees would ensure that the proposed project is paying accurate and fair share costs towards the City's planned infrastructure improvements. Further, the establishment of a benefit assessment district would ensure that the project's specific demand on the wastewater treatment plant would be less than significant.

The following mitigation is required by the project. Implementation of the below mitigation would reduce the project's impacts to the wastewater treatment plant to a less-than-significant level.

Mitigation Measures

UTIL-1 If there is an update to the City's development impact fees associated with, but not limited to, water facilities, wastewater facilities, and transportation facilities at the time of the project's issuance of a certificate of occupancy, the project developer is required to pay its fair share as determined by the City. If this update is not completed at the time of the project's issuance of a certificate of occupancy, the proposed project is required to pay the development impact fees pursuant to City Ordinance 458, Section 1, 2005

UTIL-2 If a benefit assessment district has been established in an area that encompasses the project site at the time of the project's issuance of a certificate of occupancy, the project is required to participate in this benefit assessment district and to contribute funds and encumber properties in this district in the amount determined by the benefit assessment district's guidelines.

d-e. Solid waste from Greenfield is currently transported to the Johnson Canyon Landfill facility east of Gonzales. According to CalRecycle, the landfill has a remaining capacity of

approximately 12.6 million tons and its cease operation date is December 2066 (CalRecycle 2022a).

The proposed project could increase the City's population by approximately 165 people. With a calculated disposal rate of 2.3 pounds per person per day (CalRecycle 2022b), the proposed project would result in approximately 380 pounds of solid waste generated daily (165 people x 2.3 pounds per person per day), or approximately 69 tons of solid waste generated each year. This makes up a small amount of the capacity remaining at the landfill and, therefore, the landfill has sufficient capacity to accept solid waste generated by the proposed project in compliance with federal, state, and local regulations. No physical changes would be required, and therefore, there would be no environmental impact.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Analysis:

- a-d. The project site is not located within or near a State responsibility area or lands classified as very high fire hazard severity zones (CalFire 2022). Therefore, further analysis related to wildfire hazards is not necessary. The project would present no impact relative to wildfire hazards.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Analysis:

- a. As discussed in Section 4, Biological Resources, given the disturbed and agriculturally developed condition of the project site, the lack of native vegetation, and the site’s isolation from high quality habitat areas, most special-status plant and animal species known to occur in the region are not expected to occur on the project site due to lack of suitable habitats. However, protected nesting bird species and raptor species, as well as special-status bat species, have the potential to nest or roost in buildings or structures on or adjacent to the site. In addition, the likelihood of the presence of kit foxes on or adjacent to the site is low, but they could seek shelter during construction within artificial structures. Therefore, implementation of Mitigation Measures BIO-1 through BIO-4 would reduce these potential impacts to a less-than-significant level.

As described in Section 5, Cultural Resources, the project site does not consist of historic structures on-site and is not known to contain any historic or prehistoric resources. However, it is possible that these resources could be accidentally uncovered during grading and construction activities. In the event this should occur, the standard conditions of approval outlined in this section would ensure that the potential impacts would not be significant.

- b. Based on the analysis provided in this initial study, the proposed project could result in cumulatively considerable impacts related to: criteria air pollutant emissions and their effects to air quality during construction and operation; temporary biological impacts during construction associated with special-status species; earthmoving activities potentially disturbing or uncovering unknown prehistoric or historic archaeological resources and human remains; and greenhouse gas emissions that are inherently cumulative in nature. However, implementation of the mitigation measures and standard conditions of approval presented in each of these respective sections would result in less than cumulatively considerable impacts.

Conversely, the proposed project in addition to present and future development projects within the City could result in cumulatively considerable impacts associated with water, wastewater, and transportation (specifically the Walnut Avenue Interchange). As discussed in Section 19.0, Utilities and Service Systems, the City has been increasing its housing production, pursuant to state law, at a rapid pace. During the City's 5th housing element period (2014-2023), the state required that the City reach 363 units. By the end of 2021, the City had reached 519 units, which surpasses the requirement by the state. Including issued building permits for new residential units through November 2022, the City's Building Division reports an additional 620 units across all income categories. The Greenfield Commons Multi-Family Residential Project at 41206 Walnut Avenue has planning approvals, but because it does not have building permits issued it is not included in the City's RHNA numbers. If included, the City's total housing production across all income categories would be 840 units as of November 2022. This represents 231 percent of the state's allocation for the City. This overage of 477 units built in the 5th cycle should be carried over and counted against the 6th cycle requirements.

Development of 477 units over the requirements of the state to provide housing in the City of Greenfield, and the proposed project in addition to other present and future development within the City (e.g., the Walnut Grove Project (Phases I, II, and III), the Magnolia Place Project Phase 2, the Vintage Meadows Project Phase 2, and other higher density projects) all increase the demand on limited water and wastewater infrastructure in addition to impacts associated with the Walnut Avenue Interchange. Therefore, the proposed project in addition to current and future development projects within the City would have cumulatively considerable impacts, especially associated with water, wastewater, and transportation facilities. These three topic areas are discussed in more detail below.

Water. According to the *City of Greenfield Potable Water Distribution System Master Plan Update*, the existing water distribution system requires system upgrades due to several deficiencies found in the flow and pressure delivery of water (e.g., replacement and upsizing pipes, water service lateral and material replacements, etc.). It would be speculative to determine the impacts of development that has not yet occurred and the infrastructure improvements whose necessity, in addition to location and type, are unknown at this time. Impacts from any expansion of existing infrastructure required by

new development in the City would be further analyzed under separate CEQA review when determinations are made on the type, scope, and location of the needed infrastructure. In addition, the *City of Greenfield Potable Water Distribution System Master Plan Update* recommends that as development is proposed, an evaluation be completed to identify which of the recommended system upgrade projects are required to be completed to adequately serve the proposed development.

Compliance with the City's Municipal Code Chapter 13.09 and the *Greenfield California 2020 Water Shortage Contingency Plan* would ensure that the proposed project and future projects reduce water supply demands during times of drought and/or low water supply availability. This, in addition to an evaluation by future projects of potentially required improvements on the City's water service system and implementation of Mitigation Measures UTIL-1 and UTIL-2, would ensure impacts would be less than cumulatively considerable related to the City's water facilities.

Wastewater. There is a cumulative impact on the wastewater treatment plant's ability to adequately serve the community from increasing housing and population as well as new and intensified non-residential uses. The wastewater treatment plant requires upgrading, which has been approved but will require the appropriate funds from all new developments in order to be completed. This cumulative impact on the wastewater treatment plant can be mitigated by the implementation of the Mitigation Measures UTIL-1 and UTIL-2, which would reduce impacts to be less than cumulatively considerable.

Transportation. The operations of the Walnut Avenue interchange as a result of the rapid increase in population and housing has been a concern for the City. At the time the Walnut Avenue Specific Plan was created, this interchange was evaluated and mitigation was required for development within the Specific Plan Area. An interim project (restriping and resigning the interchange) was completed in 2017 to ensure that development within the Specific Plan area would not impact traffic operations at this interchange and that operation levels reached LOS D. However, future housing recently built and currently in the entitlement process were not considered in the Walnut Avenue Specific Plan. The housing that occurred within the City's previous housing element cycle (including the Walnut Grove Apartments on West Walnut Avenue) have already created a current traffic concern for vehicles and pedestrians at the U.S. Highway 101 intersection at Walnut Avenue. The City has identified a series of projects to address and enhance capacity issues; some of these projects are identified below:

- Widen Walnut to add an additional westbound lane from El Camino Real to US101;
- Infill Sidewalk between El Camino Real and 3rd Street;
- Improve Walnut Ave./US101 Interchange capacity;
- Improve Walnut Avenue/El Paseo Way Interchange;
- Study Mid-block Crosswalk on Walnut Ave. at California Pizza Kitchen;

- Intersection Capacity Improvements at Walnut/El Camino Real Intersection; and
- Perform a Master Traffic Study to affirm collective benefits of above elements (Doug Pike, email message, December 8, 2022).

Implementation of Mitigation Measures UTIL-1 and UTIL-2 would ensure that cumulative impacts on the Walnut Avenue Interchange by future development within the City are addressed and reduce these impacts to less than cumulatively considerable.

- c. Based on the analysis provided in this initial study, the proposed project could indirectly cause substantial adverse effects to human beings through hazardous air emissions exposure to sensitive receptors and hazardous materials. However, with implementation of the mitigation measures presented in this initial study, the proposed project would not result in environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

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