

Gonzales Climate Action Plan Supplemental Environmental Impact Report

Final SEIR

A Supplement to the
Gonzales 2010 General Plan
Environmental Impact Report
SCH# 2009121017



City of Gonzales
January 2013



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Gonzales Climate Action Plan Supplemental Environmental Impact Report

Final SEIR Response to Comments

A Supplement to the
Gonzales 2010 General Plan
Environmental Impact Report
SCH#2009121017

Prepared for:

City of Gonzales

Prepared by:

Coastplans

January 2013

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CHAPTER 1. INTRODUCTION

The purpose of this Final Supplemental Environmental Impact Report (Final SEIR) is to provide a good-faith, well-reasoned response to each comment received on the “Gonzales Climate Action Plan Draft Supplemental Environmental Impact Report” (Coastplans, October, 2012; SCH# 2009121017). In addition, an Addendum has been prepared to this Final SEIR that evaluates minor technical revisions that are being made due to some minor inconsistencies discovered in Table CAP-14 and Table CAP-15. Refer to Chapter 3 for a complete discussion.

1.1 CEQA REQUIREMENTS FOR A FINAL SEIR

This Final Supplemental EIR (Final SEIR) for the Project has been prepared in accordance with CEQA and the State CEQA Guidelines. State CEQA Guidelines Section 15132 requires that a Final EIR consist of the following:

- the Draft Environmental Impact Report (Draft EIR) or a revision of the draft;
- comments and recommendations received on the Draft EIR, either verbatim or in summary;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- any other information added by the lead agency.

In accordance with State CEQA Guidelines Section 15132(a), the Draft Supplemental EIR (Draft SEIR) prepared for the Gonzales Climate Action Plan is incorporated by reference into this Final SEIR.

An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed development, and an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

1.2 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR involves the following general procedural steps:

1.2.1 NOTICE OF PREPARATION AND INITIAL STUDY

Pursuant to the CEQA Guidelines, an Initial Study and Notice of Preparation (NOP) was prepared by the City and circulated on August 29, 2012 for a 30-day public review period ending on September 28, 2012. The City received two (2) comment letters, both which contained comments pertaining to the content of the Climate Action Plan not to the scope of the proposed Draft SEIR. The Initial Study and NOP; together with the comment letters are on file and can be inspected at the office of the Community Development Department, 147 Fourth Street, Gonzales, California 93926.

1.2.2 NOTICE OF AVAILABILITY AND DRAFT SEIR

The City provided the State Clearinghouse with the Notice of Completion (NOC) and Draft SEIR for review on October 30, 2012. The City also circulated a public notice of availability (NOA) for the Draft SEIR, inviting comment from the general public, trustee agencies, responsible agencies, organizations, and other interested parties. The Draft SEIR was available for a 45-day review from October 30, 2012 through December 14, 2012. The DSEIR addressed new information of substantial importance that was not known at the time that the “*Gonzales 2010 General Plan Environmental Impact Report (SCH # 2009121017)*” was certified in January 2011. The new information addressed impacts related to greenhouse gas emissions and the preparation and proposed adoption of a Climate Action Plan that is proposed to be incorporated by reference into the *Gonzales 2010 General Plan*.

1.2.3 RESPONSE TO COMMENTS/FINAL SEIR

In January 2013, the City prepared this Final SEIR in response to the one (1) written comment received during the comment period, as required by CEQA. Pursuant to Section 15088(b), the lead agency shall provide a written proposed response to a public agency on comments made by that public agency at least ten (10) days prior to certifying an environmental impact report.

1.2.4 ADDENDUM TO THE FINAL SEIR

Following issuance of the Draft SEIR in October 2012, the City made changes to the proposed Gonzales CAP to correct inconsistencies of information found in Table CAP-14 and Table CAP-15 and discussed in the CAP and pages VII-1 and VII-2. The City reviewed the changes to determine whether any "significant" new information was added. The City determined that no new significant information was added and based upon the requirements established under CEQA Guidelines Section 15088.5, the Draft SEIR did not need to be recirculated. Instead, the City prepared an Addendum to the Final SEIR, which is provided in Chapter 3 of this Final SEIR.

The Draft SEIR, this document and the Addendum herein constitute the Final SEIR.

1.2.5 CERTIFICATION OF THE FINAL SEIR/PROJECT CONSIDERATION

The Planning Commission will review and consider the Final SEIR and is anticipated to make findings and a recommendation to the City Council to certify the document as adequate and complete. The City Council will consider the recommendation of the Planning Commission and after review and consideration they may certify the Final SEIR as adequate and complete before taking final action to approve the Gonzales Climate Action Plan.

1.3 ORGANIZATION OF THE FINAL SEIR

Chapter 1 is this introduction. Chapter 2 contains the one and only comment letter received with an accompanying response from the City of Gonzales (Lead Agency). The letter is from the Monterey Bay Unified Air Pollution Control District and contains two recommendations for revising one or more mitigation measures contained in the SEIR. Both of these suggestions have been accepted and incorporated as part of the Final SEIR. Each of these changes has been carefully reviewed to determine if it represents a substantial change, which would require recirculation of the SEIR. It has been determined that neither of the proposed changes would require recirculation of the SEIR.

Chapter 3 contains an SEIR Addendum that lists minor technical revisions to the proposed project, with a justification for the decision not to re-circulate the SEIR, to prepare a subsequent EIR, or to prepare a second supplement to the GP EIR.

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CHAPTER 2. RESPONSE TO COMMENTS

This chapter presents comments received on the “Gonzales Climate Action Plan Supplemental Environmental Impact Report” (Coastplans, October, 2012; SCH# 2009121017). Only one letter was received, and this letter was from the Monterey Bay Unified Air Pollution Control District dated December 14, 2012. The letter was received within the comment period which ended on December 14, 2012.

2.2 COMMENTS AND RESPONSES

This section presents the comment letter received on the SEIR from the Monterey Bay Unified Air Pollution Control District and the lead agency response to each comment contained in that letter. An identification number has been assigned to each comment and this number is used as a key to the responses, which follow immediately after the letter.

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2.1 MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT



24580 Silver Cloud Court
 Monterey, CA 93940
 PHONE: (831) 647-9411 • FAX: (831) 647-8501

December 14, 2012

Thomas Truskowski
 Community Development Director
 City of Gonzales
 P.O. Box 647/147 Fourth Street
 Gonzales, CA 93926

SUBJECT: Draft Supplemental Environmental Impact Report (DSEIR) – Gonzales 2012 General Plan/Climate Action Plan

Dear Mr. Truskowski:

Thank you for providing the Monterey Bay Unified Air Pollution Control District (Air District) the opportunity to comment on the above-referenced document. The Air District commends the City for its efforts in developing a Climate Action Plan to reduce greenhouse gas (GHG) emissions through local action. The Climate Action Plan should be built upon mandatory measures to reduce GHG emissions and not rely on voluntary measures for significant GHG emission reductions.

The Air District has reviewed the above-referenced document and has the following comments:

MBUAPCD-1

- The Air District recommends revising either Mitigation Measure GHG-1 or GHG-2 to clearly state the reduction targets the City intends to implement for new development as stated at the top of page 4-23.

MBUAPCD-2

- The Air District recommends adding a statement to Mitigation Measure GHG-1 which indicates the Citywide Climate Action Plan will address long-term GHG emission reduction targets out to 2050 as stated on page 4-23.

If you have question, please contact me at (831) 647-9418 ext. 227 or aclymo@mbuapcd.org.

Best regards,

Amy Clymo
 Supervising Air Quality Planner

cc: Mike Gilroy, Deputy Air Pollution Control Officer
 David Craft, MBUAPCD Air Quality Engineer/Planner

Richard A. Stedman, Air Pollution Control Officer

2.3 RESPONSE TO AIR DISTRICT COMMENTS

MBUAPCD-1: Add proposed GHG emission reduction targets to Mitigation Measure GHG-1 or GHG-2

MBUAPCD-2: Add statement indicating the Climate Action Plan will address long-term GHG emissions out to 2050 to Mitigation Measure GHG-1.

Response: In response to both comments above, Mitigation Measure GHG-1 is hereby revised to read as follows:

Mitigation Measure GHG-1: Citywide Climate Action Plan

The City shall complete work currently underway on, and then adopt, a citywide climate action plan with the objective of meeting a GHG emissions reduction trajectory consistent with State law (currently codified in Health and Safety Code 38500 et seq. (AB 32) and Executive Order S-03-05).¹ The City, in setting the trajectory, shall recognize the likelihood that Gonzales may bear a much larger percentage of growth than other more mature communities in the State and that an appropriate scaling of the State targets set forth in AB 32 and Executive Order S-03-05 would allow a citywide increase in GHG emissions as the City implements the Gonzales 2010 General Plan. This allowable increase in GHG emissions shall be tempered by appropriate measures to limit GHG emissions from new development on a per capita basis, while achieving actual reductions in such emissions from existing uses in the planning area. The limits to be established for per capita GHG emissions shall be indexed to realistic targets that are readily achievable using GHG Best Management Practices identified as part of the citywide climate action plan. The 2020 GHG emission reduction target for new development shall represent a 15 percent reduction from what new GHG emissions would otherwise have been in 2020 under “business-as-usual” conditions, as specified in Table CAP-8 of the adopted Climate Action Plan. Targets for reducing GHG emissions in existing development shall, at a minimum, be a 15 percent reduction from the baseline identified in the GHG inventory prepared by AMBAG (2009).

¹ Pursuant to these mandates, California is committed to reducing GHG emissions to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. These objectives are consistent with the underlying environmental objective of stabilizing atmospheric concentrations of greenhouse gases at a level that will substantially reduce the risk of dangerous climate change.

Finally, the adopted climate action plan shall contain long-term GHG emission reduction targets (out to 2050) and a discussion of measures to meet these long-term targets.

The City shall adopt a citywide climate action plan as outlined above prior to the adoption of any Specific Plan in the Urban Growth Area.

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CHAPTER 3. ADDENDUM TO THE SEIR

This chapter is an addendum to the SEIR that evaluates minor technical revisions that have been made to the Gonzales Climate Action Plan in response to comments received during the comment period for the SEIR.

The minor technical revisions made by the City of Gonzales have been evaluated to determine if they have the potential to result in a new significant effect or to result in making a significant effect that was examined in the SEIR more severe. Based on this evaluation, which is presented below, it has been determined that the changes merely make an insignificant modification to the proposed project to correct an inconsistency between Table CAP-14 and Table CAP-15. Therefore, the appropriate document to evaluate the changes is an Addendum to this Final SEIR.

3.0 EVALUATION OF MINOR TECHNICAL REVISION

The City of Gonzales has revised text and tables on pages VII-1 and VII-2 of the Gonzales Climate Action Plan as follows:

To establish metrics for new development, and an appropriate nexus between the GHG emission impacts of new development and the measures contained in this CAP for reducing such impacts, the first task is to factor out those measures over which private developers exercise no control. Solid waste reduction efforts and improvements to the wastewater treatment plant, ~~which~~ represent 14.8 percent of total reductions by 2020. This leaves ~~85.2~~ 87.3 percent (2,058 MT CO₂e) to be achieved by private developers as they develop new neighborhoods and employment areas. Of this amount, measures aimed at new residential development, plus bike lanes, account for 49 percent of potential savings (1,152 1,162 MT CO₂e); measures aimed at new commercial and industrial development account for 38 percent of potential savings (896 MT CO₂e). This is roughly proportional to the impacts of these two types of development.

The next task is to calculate per unit savings for both types of development (residential and commercial/industrial). The City of Gonzales estimates that it could add 540 houses and 727,400 square feet (see the discussion in Chapter VI above, which was derived from the “Gonzales 2010 General Plan EIR”). When these unit numbers are applied to their respective targets, new residential construction would need to achieve savings of approximately ~~2.13~~ 2.15 MT CO₂e per dwelling unit to be deemed consistent with the Gonzales CAP. New

commercial and industrial construction for its part would need to achieve savings of approximately 1.23 MT CO₂e per 1,000 square feet of construction. In both cases, GHG reductions will be measured against “business-as-usual” conditions, which are defined as conditions under which none of the programs listed in Table CAP-14 (see Chapter VI above) would be implemented. Table CAP-15 summarizes the GHG emission reduction metric to be applied to new development.

Table CAP-15
GHG REDUCTION METRIC
(Per Unit of New Development)

	<i>Projected Development by 2020</i>	<i>Targeted Savings (MT CO₂e)</i>	<i>GHG Reduction Metric (MT CO₂e per unit of new development)</i>
<i>Residential Construction</i>	<i>540 du</i>	<i>1,152</i> <i>1,162</i>	<i>2.13</i> <i>2.15 per du</i>
<i>Commercial/Industrial Construction</i>	<i>727,400 sf</i>	<i>896</i>	<i>1.23 per 1,000 sf</i>

Source: City of Gonzales

[End of revision]

The revision described above corrects an inconsistency between Table CAP-14 and Table CAP-15 in the Gonzales Climate Action Plan. In the prior version, the 10 MT CO₂e of savings attributable to bike lanes (built as part of new development) were omitted from the calculations of Table CAP-15. This has been corrected by adding the savings to the targeted savings for residential development, where most bike lanes will be constructed. Bike lanes will also be built in non-residential areas, but as non-residential areas account for only a small portion of new development and the savings are modest in any event, the City of Gonzales has chosen to add the entirety of the savings to residential development.

Also in the prior version, the percentage of savings to be achieved by private developers was reported to be 82.5 percent. This has been corrected to be 87.3

percent, which then allows the two percentages—solid waste/wastewater and private developers—to add up to 102.1 percent. This is consistent with Table CAP-14.

There are no negative environmental effects associated with these proposed changes.