Exhibit I

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April 27, 2022

VIA E-MAIL LUNDQUISTE@CO.MONTEREY.CA.US

Mr. Erik V. Lundquist, AICP
Chief of Planning
Monterey County HCD
1441 Schilling Place
Salinas, CA 93901

Re: River View at Las Palmas (PLN150372)

Dear Mr. Lundquist:

I am writing on behalf the Las Palmas Ranch Master Association No. 1 ("Association") in response to the Developer's April 7, 2022 letter and submittal of the alternative 30 lot subdivision ("Subdivision Project") in place of the Senior Living Facility proposed for Parcel Q in Las Palmas.

Subdivision Proposal Agreed Upon

The Association finds that the proposed Subdivision Project is a preferred alternative to the Senior Living Facility project as an option for Parcel Q. There are, however, several criteria to which the Association agreed, and areas of concern that are not reflected in the proposal submitted.

The Association and the Developers met several times in November and December 2021 to discuss the project. In late November the Developer provided the Association with a proposed tentative map (dated 11/29/2021) showing 28 buildable lots with an 18 foot height limit. Additionally, the Developer agreed to B-6 overlay zoning (no further subdivision) being placed on the property; and the area outside the developed lots/streets being placed under a Scenic Easement.

The Association's position was, and remains, that it would support a residential subdivision plan that is:

1. No greater than 28 single family residential units on the site;

2. Limited to one-story single family units, with an 18' height limitation (the height limit needs to be recorded and run with the land, binding future owners);

3. A B-6 overlay zoning (no further subdivision) is placed on the property; and

4. The area outside the developed lots/streets is placed under a Scenic Easement.

These are important criteria to which the Developer agreed, which need to be conditions of the Subdivision Project approval.

In addition, the Association expressed concerns regarding other items relating to the proposed Subdivision Project.

Stormwater Runoff, Drainage, Erosion Control, and Slope Stability

The Association raised concerns relating to the stormwater runoff, drainage, erosion control, and slope stability, all of which remain of significant concern today and need to be addressed through the subdivision approval process.

Stormwater Runoff: Allowing all surface water to flow off the Parcel Q site into the Association's existing storm water culverts, as now proposed, was not analyzed in the Draft Environmental Impact Report (See EIR pages 11-2 to 11-6 attached), is a marked deviation from the Senior Living Facility plan which required all runoff to be contained on the site, and is of major concern to the Association. The Association is responsible for the existing storm water system to the point where it meets the CSA intake and flows directly into the Salinas River through an underground pipe below River Road. There has been no analysis of the impact of this proposal. Moreover, the Association expects stormwater runoff from the site will be in compliance with all County and State requirements for surface runoff, including water runoff being retained on-site. Full engineering plans addressing stormwater runoff need to be prepared before Project approval, and made available to the Association for review, as part of the Subdivision Project review process, not after the fact.

Erosion Control: Runoff and erosion control on the steep slopes above Las Palmas Ranch 1 has been an ongoing problem for the Association and, at times, resulted in the flooding of homeowner's properties at the bottom of the hill (See EIR pages 11-2 to 11-6). Full engineering plans for run off and erosion control need to be prepared before the Subdivision Project approval, and made available for Association review, so that mitigations and conditions can be added to the Subdivision Project to protect the Association's facilities and the member's properties.

Slope Stability: Slope stability is also a major concern for the Association with landslides occurring on the slopes above Las Palmas Ranch 1 (See EIR pages 11-2 to 11-6). Slope stability needs to be addressed, with proper investigation, engineering studies, and mitigations made available for Association review before Project approval, so that mitigations and conditions can be added to the Subdivision Project to protect the Association's facilities and member's properties.

Fire Access

Adequate fire access remains a major concern to the Association. The Association expects that the Subdivision Project will be compliant with all applicable local, State, and Federal regulations regarding fire access and evacuation routes.

On-Site Parking

The Association expects that the County will assure that there is adequate on-site parking for the Subdivision Project given overflow parking will spill over on to the current Las Palmas Ranch 1 subdivision area and exacerbate an already difficult parking situation.

Specific Plan Amendment

With regard to a Las Palmas Ranch Specific Plan Amendment, the Association conveyed to Mr. Lombardo, and it remains the Association's position, that the Association does not want to waive the application of the Las Palmas Ranch Specific Plan to this site, keeping the Specific Plan intact. However, the Association could consider a finding by the County that 28 residential lots are in substantial compliance with the Specific Plan, as Parcel Q was shown as being an area for residential development under the Specific Plan. The Association expects the County to make the determination as to whether a Specific Plan Amendment is required. That is not the Association's decision.

CEQA Review

The Association expects that the County will comply with California law and the regulatory requirements with regard to the CEQA review required for the revised Subdivision Project.

Approval Process

The Association expects that the County will conduct the Subdivision Project review in accordance with the County Code and other regulations required for the approval of the Subdivision Project; that the Association will have the opportunity to comment on the Subdivision Project throughout the process; and that the County will

address the Association's concerns, with appropriate mitigations and conditions being placed on the Subdivision Project approval, so the Subdivision Project does not create a negative impact on the existing Association facilities or its members.

The Association reserves its' rights to comment on issues that directly relate to the Association's property such as internal traffic, parking, erosion/drainage, slope stability, storm water facilities, fire access, security, etc.; to comment on documents under consideration by the County; and to fully participate in the Subdivision Project hearing process.

Sincerely,

NOLAND, HAMERLY, ETIENNE & HOSS
A Professional Corporation

Christine Kemp

Christine G. Kemp

CGK:kp

Encl. EIR pages 11-2 to 11-6

cc: Mr. Anthony Lombardo, Esq.

Supervisor Mary Adams, District 5

11.4 GEOLOGY & SOILS

The project site is not located within any earthquake fault zones as delineated on the most recent Alquist-Priolo Earthquake Zoning Map and no faults cross the site. As with the entire region, ground shaking from earthquakes could be very strong within the project site. The proposed project is designed in accordance with applicable building codes and engineering standards that have been developed to address the forces to which buildings are subjected during earthquakes and should allow the buildings to withstand earthquakes without severe damage. According to the geologic hazards report and soil engineering feasibility investigation prepared for the project (Landset Engineers, Inc. 2014., Appendix F), the project site is in an area of low to very low potential for liquefaction, lateral spreading, subsidence, expansion, collapse, dynamic compaction, and ridgetop shattering. Erosion control measures would be implemented as a condition of project approval to ensure there would be no related impacts.

While the steep slopes on the north and south flanks of the site are prone to landslides and slope failure, future building foundations will be located within the geologically suitable building envelope as described in the report, which would avoid environmental impacts related to landslides. As displayed in Figure 11-1, Project Site Slopes, a portion of the area of the project site proposed for development is located in an area of slopes greater than 25% slope.

The proposed project would connect to the Las Palmas Wastewater Treatment Plant, operated by California American Water Company and no septic systems are proposed. Therefore, the suitability of geologic and soils conditions for septic systems is not relevant to the proposed project.

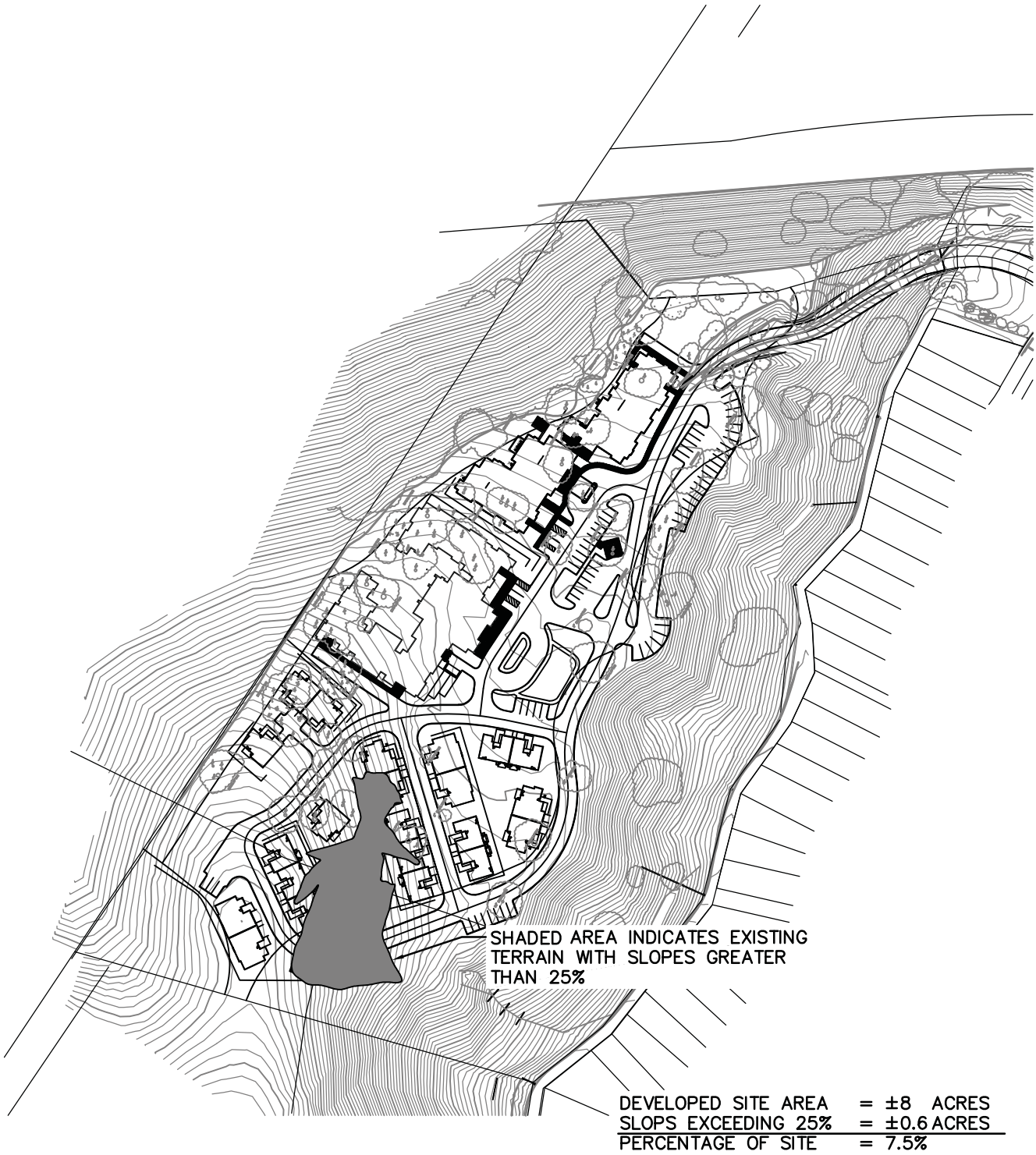
During the course of the 2017 winter storms a portion of the property had a "minor colluvial slope failure…due to unseasonably above average precipitation …[which posed] … a low risk to human health and safety." (Landset, March 29, 2017)

As a condition of approval, all recommendations included in the geotechnical report would be implemented in the design and construction of the project to ensure that there would be no significant impacts associated with geologic hazards.

11.5 HAZARDOUS MATERIALS

The proposed project is a senior living facility and, as such, may involve patient care which could result in the routine transport, use or disposal of biohazardous materials and/or medical waste. The proposed project would be required to adhere to state and local

Figure 11-1 Project Site Slopes



Source: Gateway Engineering, Inc. 2015

Figure 11-1

Project Site Slopes

River View Senior Project Draft EIR

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regulations for the appropriate transport, use, and disposal of medical waste, which would ensure that there would not be related environmental impacts. The project site does not contain contaminated land or hazardous materials sites as compiled pursuant to Government Code Section 65962.5 and would not result in the release or upset of hazardous that would result in exposure of sensitive land uses to such materials. The nearest airport, Salinas Municipal Airport is more than four miles from the site; this distance precludes the possibility for the project to create an aviation safety hazard. The Monterey County General Plan Safety Element identifies emergency evacuation routes throughout the county. These routes include River Road and State Route 68. While future development may add to demand for use of emergency routes, such development would not physically interfere with the ability of the county to deploy these routes for evacuation. According to the Monterey County General Plan, the project site is not located in a high or very high fire hazard area. Every building, structure, and/or development shall be constructed to meet the minimum requirements specified in the current adopted state building code, state fire code, Monterey County Code Chapter 18.56, Monterey County General Plan, and other nationally recognized standards. Additionally, the Monterey County Regional Fire District reviewed the project plans and determined that adequate fire flow exists feed the property fire protection systems. The fire district has also recommended a number of conditions of approval that reflect the current requirements of the Uniform Fire Code and the fire district regulations. These requirements will be included in the final project construction drawings to be reviewed and approved by the fire district prior to issuance of building permits. The fire district will subsequently inspect the in-progress construction and will have to give a final approval prior to occupancy.

The proposed project will not result in hazard impacts.

11.6 SURFACE HYDROLOGY

Erosion and Water Quality

The undeveloped project site currently drains naturally down the existing slopes and drainage ways or percolates through the soil back into the groundwater basin. Development of the proposed project would alter existing storm water drainage conditions by replacing undeveloped land with impervious surfaces. The change in surface conditions would result in a substantial increase in storm water runoff from the site as a portion of the storm water would no longer percolate though exposed soil. Storm water runoff from the project site during construction and after development is completed would be greater in volume and velocity than under existing conditions. Changes in the rate or volume of storm water delivered into receiving waters can result in hydromodification of downstream drainage courses, resulting in further erosion and related water quality degradation.

The proposed project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Storm Water Associated with Construction Activities. In Monterey County, the Central Coast Regional Water Quality Control Board (RWQCB) is charged with enforcing NPDES requirements, including runoff management programs that include Best Management Practices to control erosion and sedimentation. Through implementation of Best Management Practices (BMPs), construction of the proposed project would not impact surface and groundwater water quality from storm water runoff during construction.

The proposed project must implement water quality control measures consistent with the post-construction water quality criteria contained in the RWQCB NPDES requirements. A storm water control plan consistent with NPDES requirements to be approved by the county has been developed for the project which identifies measures for site design, storm water runoff source control, runoff reduction, storm water treatment; and site specific BMP measures that would be incorporated in the project design to ensure there would be no post-construction impacts related to erosion or degradation of water quality.

Storm Water Runoff

The proposed project would result in increases in impervious area that in turn would result in increases in the volume and rate of storm water runoff relative to existing conditions.

The project site is undeveloped and does not currently contain storm drainage infrastructure. However, the proposed project design includes storm drainage facilities (collection, conveyance and disposal) as detailed in the storm water control plan (Gateway Engineering 2016) to meet the generation of storm water runoff. Proposed development must not exceed the pre-project rate of discharge. The purpose is to reduce the potential for increased erosion within receiving waters due to an increase in the rate of storm water flow. The storm water control plan includes on-site storm water control measures designed to achieve a no net increase in rate of storm water discharge relative to pre-project conditions. This reduces the potential that runoff from new development could exceed the capacity of storm drainage facilities and contribute to off-site flood hazards.

A county reviewed storm water control plan in conformance with storm drainage facility design standards and NPDES requirements would be implemented ensuring that there would be no impacts related to localized flooding.

Flood Hazards

According to the Monterey County General Plan FEMA Floodplain Map, the Salinas River's projected 100-year flood plain follows River Road to the north. The project site is elevated substantially above River Road and is not located within the 100-year flood plain. Thus, there would be no impacts related to flood hazards.

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