County of Monterey

Government Center - Board Chambers
168 W. Alisal St., 1st Floor
Salinas, CA 93901

Meeting Agenda - Final

Wednesday, March 13, 2024
9:00 AM

Monterey County Planning Commission

The Recommended Action indicates the staff recommendation at the time the agenda was prepared. That recommendation does not limit the Planning Commission alternative actions on any matter before it.

In addition to attending in person, public participation will be available by ZOOM and/or telephonic means:

You may participate through ZOOM. For ZOOM participation please join by computer audio at: https://montereycty.zoom.us/j/98927822741

OR to participate by phone call any of these numbers below:
+ **1 669 900 6833 US (San Jose)**
+ **1 346 248 7799 US (Houston)**
+ **1 312 626 6799 US (Chicago)**
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Enter this Meeting ID number 989 2782 2741 when prompted.

PLEASE NOTE: IF ALL COMMISSIONERS ARE PRESENT IN PERSON, PUBLIC PARTICIPATION BY ZOOM IS FOR CONVENIENCE ONLY AND IS NOT REQUIRED BY LAW. IF THE ZOOM FEED IS LOST FOR ANY REASON, THE MEETING MAY BE PAUSED WHILE A FIX IS ATTEMPTED BUT THE MEETING MAY CONTINUE AT THE DISCRETION OF THE CHAIRPERSON.

If you choose not to attend the Planning Commission meeting in person, but desire to make general public comment, or comment on a specific item on the agenda, you may do so in two ways:

a. Submit your comment via email by 5:00 p.m. on the Tuesday prior to the Planning Commission meeting. Please submit your comment to the Clerk at pchearingcomments@co.monterey.ca.us . In an effort to assist the Clerk in identifying the agenda item relating to your public comment please indicate in the Subject Line, the meeting body (i.e. Planning Commission Agenda) and item number (i.e. Item No. 10). Your comment will be placed into the record at the meeting.

b. You may participate through ZOOM or telephonically. For ZOOM or telephonic participation please join by computer audio using the links above.

DOCUMENT DISTRIBUTION: Documents related to agenda items that are distributed to the Planning Commission less than 72 hours prior to the meeting shall be available for public inspection at the meeting the day of the Planning Commission meeting and in the Housing and Community Development Office located at 1441 Schilling Place, 2nd Floor, Salinas California. Documents submitted in-person at the meeting, will be distributed to the Planning Commission. All documents

submitted by the public at the meeting the day of the Planning Commission must have no less than ten (10) copies. Comments received after the agenda item will be made part of the record if received prior to the end of the meeting.

ALTERNATIVE FORMATS: If requested, the agenda shall be made available in appropriate alternative formats to persons with a disability, as required by Section 202 of the Americans with Disabilities Act of 1990 (42 USC Sec. 12132) and the federal rules and regulations adopted in implementation thereof. For information regarding how, to whom and when a person with a disability who requires a modification or accommodation in order to participate in the public meeting may make a request for disability-related modification or accommodation including auxiliary aids or services or if you have any questions about any of the items listed on this agenda, please call the Monterey County Housing and Community Development at (831) 755-5025.

INTERPRETATION SERVICE POLICY: The Monterey County Planning Commission invites and encourages the participation of Monterey County residents at its meetings. If you require the assistance of an interpreter, please contact the Monterey County Housing and Community Development Department by phone at (831) 755-5025. The Clerk will make every effort to accommodate requests for interpreter assistance. Requests should be made as soon as possible, and at a minimum 24 hours in advance of any meeting. NOTE: All agenda titles related to numbered agenda items are live web links. Click on the title to be directed to the corresponding staff report and associated documents.

PUBLIC COMMENT: Members of the public may address comments to the Planning Commission concerning each agenda item. The timing of public comment shall be at the discretion of the Chair.

La medida recomendada indica la recomendación del personal en el momento en que se preparó la agenda. Dicha recomendación no limita las acciones alternativas de la Comisión de Planificación sobre cualquier asunto que se le haya sometido.

Además de asistir en persona, la participación del público estará disponible por ZOOM y/o medios telefónicos:

Puede participar a través de ZOOM. Para la participación de ZOOM, únase por computadora en: https://montereycty.zoom.us/j/98927822741

O para participar por teléfono, llame a cualquiera de estos números a continuación:
+ **1 669 900 6833 US (San Jose)**
+ **1 346 248 7799 US (Houston)**
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+ **1 929 205 6099 US (New York)**
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Presione el código de acceso de reunión: 989 2782 2741 cuando se le solicite.

TENGA EN CUENTA: SI TODOS LOS COMISIONADOS ESTÁN PRESENTES EN PERSONA, LA PARTICIPACIÓN PÚBLICA DE ZOOM ES SOLO POR CONVENIENCIA Y NO ES REQUERIDA POR LA LEY. SI LA TRANSMISIÓN DE ZOOM SE PIERDE POR CUALQUIER MOTIVO, LA REUNIÓN PUEDE PAUSARSE MIENTRAS SE INTENTA UNA SOLUCIÓN, PERO LA REUNIÓN PUEDE CONTINUAR A DISCRECIÓN DEL PRESIDENTE DE LA REUNIÓN.

Si decide no asistir a la reunión de la Comisión de Planificación en persona, pero desea hacer comentarios públicos generales o comentar sobre un tema específico de la agenda, puede hacerlo de dos maneras:

a. Envíe su comentario por correo electrónico antes de las 5:00 p.m. del martes anterior a la reunión de la Comisión de Planificación. Por favor, envíe su comentario al asistente de la Comisión de Planificación a: pchearingcomments@co.monterey.ca.us . En un esfuerzo por ayudar al asistente a identificar el tema de la agenda relacionado con su comentario público, indique en la Línea de Asunto, la audiencia de la reunión (ejemplo, la Junta de la Comisión de Planificación) y número de artículo (ejemplo, artículo n.º 10). Su comentario se incluirá en el registro de la reunión.

b. Puede participar a través de ZOOM o telefónicamente. Pará ZOOM o participación telefónica, únase por audio de computadora utilizando los enlaces anteriores.

DISTRIBUCIÓN DE DOCUMENTOS: Los documentos relacionados con los temas de la agenda que se distribuyan a la Comisión de Planificación menos de 72 horas antes de la reunión estarán disponibles para inspección pública en la reunión el día de la reunión de la Comisión de Planificación y en la Oficina de Vivienda y Desarrollo Comunitario ubicada en 1441 Schilling Place, 2nd Floor, Salinas California. Los documentos presentados en persona en la reunión se distribuirán a la Comisión de Planificación. Todos los documentos presentados por el público en la reunión del día de la Comisión de Planificación deben tener no menos de diez (10) copias. Las observaciones recibidas después del tema del programa pasarán a formar parte del acta si se reciben antes de que finalice la sesión.

FORMATOS ALTERNATIVOS: Si se solicita, la agenda se pondrá a disposición de las personas con discapacidad en formatos alternativos apropiados, según lo exige la Sección 202 de la Ley de Estadounidenses con Discapacidades de 1990 (42 USC Sec. 12132) y las reglas y regulaciones federales adoptadas en implementación de la misma. Para obtener información sobre cómo, a quién y cuándo una persona con una discapacidad que requiere una modificación o adaptación para participar en la reunión pública puede hacer una solicitud de modificación o adaptación relacionada con la discapacidad, incluidas las ayudas o servicios auxiliares, o si tiene alguna pregunta sobre cualquiera de los temas enumerados en esta agenda, llame al Departamento de Vivienda y Desarrollo Comunitario del Condado de Monterey al (831) 755-5025.

POLÍZA DE SERVICIO DE INTERPRETACIÓN: Los miembros de la Comisión de Planificación del Condado de Monterey invita y apoya la participación de los residentes del Condado de Monterey

en sus reuniones. Si usted requiere la asistencia de un intérprete, por favor comuníquese con el Departamento de Vivienda y Desarrollo Comunitario localizado en el Centro de Gobierno del Condado de Monterey, (County of Monterey Government Center), 1441 Schilling Place, segundo piso sur, Salinas – o por teléfono al (831) 755-5025. La asistente hará el esfuerzo para acomodar los pedidos de asistencia de un intérprete. Los pedidos se deberán hacer lo más pronto posible, y a lo mínimo 24 horas de anticipo para cualquier reunión. NOTA: Todos los títulos de la agenda relacionados con los puntos numerados de la agenda son enlaces web en vivo. Haga clic en el título para dirigirse al informe del personal correspondiente y los documentos asociados.

COMENTARIO PÚBLICO: Los miembros del público pueden dirigir comentarios a la Comisión de Planificación sobre cada punto del orden del día. El momento de los comentarios públicos será a discreción del presidente.

NOTE: All agenda titles related to numbered items are live web links. Click on the title to be directed to corresponding Staff Report.

PUBLIC COMMENT: Members of the public may address comments to the Planning Commission concerning each agenda item. The timing of public comment shall be at the discretion of the Chair.

9:00 A.M. - CALL TO ORDER

PLEDGE OF ALLEGIANCE

ROLL CALL

Christine Shaw
Paul C. Getzelman
Ben Work
Ernesto G. Gonzalez
Ramon Gomez
Francisco Javier Mendoza
Martha Diehl
Amy Roberts
Etna Monsalve
Katharine Daniels

PUBLIC COMMENTS

This is a time set aside for the public to comment on a matter that is not on the agenda.

AGENDA ADDITIONS, DELETIONS AND CORRECTIONS

The Commission Clerk will announce agenda corrections, deletions and proposed additions, which may be acted on by the Planning Commission as provided in Sections 54954.2 of the California Government Code.

COMMISSIONER COMMENTS AND REQUESTS

This is a time set aside for the Commissioners to comment or request a matter that is on or not on the agenda.

APPROVAL OF CONSENT CALENDAR

1. **Approval of the January 31, 2024 and February 14, 2024 Planning Commission Meeting Minutes.**

   Attachments: Draft PC Minutes_013124
   Draft PC Minutes_021424

9:00 A.M. – SCHEDULED MATTERS

2. PLN220063 - CUCCIA COLETTE TR

Public hearing to consider transient use of an existing house and cabin for remuneration (home-stay Short-Term Rental).

Project Location: 28180 Robinson Canyon Rd., Carmel

Proposed CEQA Action: Find the project Categorical Exempt pursuant to CEQA Guidelines Section 15301 and that none of the exceptions listed in Section 15300.1 can be made.

Attachments: Staff Report

3. PLN150372 - RIVER VIEW AT LAS PALMAS LLC

Continued from the November 8, 2023 Planning Commission hearing, consider a recommendation to the Board of Supervisors on the River View at Las Palmas Residential Subdivision, that it:

a. Certify the Final Subsequent Environmental Impact Report (SEIR), as augmented September 2023, based on the findings and evidence, and adopt a Statement of Overriding Considerations;
b. Adopt an amendment to the text of the Las Palmas Ranch Specific Plan (LPRSP) to:
    1. Increase the unit cap from 1,031 to 1,058, to allow for an additional 27 residential lots on Parcel Q;
    2. Add a new Policy 12 in Chapter II, Section C, specifying that Parcel Q shall require 25% of new housing units as affordable, 15% of which shall be on-site and available to moderate-income households and the remaining 10% of which shall be provided through payment of an in-lieu fee;
c. Approve a vesting Tentative Map to create 27 residential lots, including four moderate income units, and an open space parcel; and
d. Approve a Use Permit to allow development on slopes in excess of 25%.

Project Location: Vacant 15.64-acre lot within Las Palmas Subdivision #1, south of River Road and west of Country Park Road, within the Las Palmas Ranch Specific Plan area in the Toro Area Plan approximately 1.25 miles west of Spreckels and 0.5 miles east of State Highway 68.

Proposed CEQA action: Recommend the Board of Supervisors certify the Final Subsequent Environmental Impact Report, adopt a Statement of Overriding Considerations, and adopt a Mitigation Monitoring and Reporting Plan.

Attachments:
Staff Report
Exhibit A - Discussion
Exhibit B - Draft Resolution
Exhibit C - Las Palmas Ranch Specific Plan
Exhibit D - Toro Land Use Advisory Committee Minutes (Oct. 23, 2023)
Exhibit E - Draft Subsequent Environmental Impact Report
Exhibit F - Final Subsequent Environmental Impact Report
Exhibit G - Augmentation to the Final Subsequent EIR
Exhibit H - Vicinity Map
Exhibit I - Comment Letter

4. PLN190155 - ELLA INDUSTRIES INC

Public hearing to consider an after-the-fact approval for the construction of a private road and installation of associated utilities to serve four parcels on slopes in excess of 25%. Approval would partially clear Code Enforcement violation (21CE00499).

Project Location: Less than ½ mile northeast of the intersection of Lewis Road and Vega Road, Royal Oaks (the nearest address is 146 Vega Road, Royal Oaks).

Proposed CEQA action: Find the project categorically exemption pursuant to CEQA Guidelines Section 15303(d) and no exceptions under Section 15300.2 can be made.

Attachments:
Staff Report
Exhibit A - Draft Resolution
Exhibit B - Oak Restoration & Forest Management Plan (LIB230068)
Exhibit C - Geotechnical Evaluation (LIB230068)
Exhibit D - Geotechnical Addendum Letter (LET_STORESUND)
Exhibit E - Vicinity Map

5. REF140023 - UPDATE TO ZONING MAPS AND CLASSIFICATIONS

a. Receive a status update on the project to implement the 2010 General Plan (inland areas of unincorporated Monterey County) land use designations, which necessitates updates to the zoning maps and associated Title 21 additions and amendments; and
b. Provide input to staff.

Project Location: Countywide (Non-Coastal (Inland) Areas)

Proposed CEQA action: Consider and find this workshop is statutorily exempt per Section 15262 of the CEQA guidelines.

Attachments:
Staff Report
Exhibit A - Detailed Discussion

6. PLANNING COMMISSION REFERRAL 19.01 QUARTERLY REPORT OF AFFORDABLE AND WORKFORCE HOUSING APPLICATIONS RECEIVED BY THE COUNTY

Attachments: Staff Report
Exhibit A - Housing Pipeline

DEPARTMENT REPORT

ADJOURNMENT

County of Monterey

Board Report

Legistar File Number: MIN 24-011

Item No.1

Board of Supervisors
Chambers
168 W. Alisal St., 1st Floor
Salinas, CA 93901

March 13, 2024

Introduced: 3/4/2024
Version: 1

Current Status: Agenda Ready
Matter Type: Minutes

Approval of the January 31, 2024 and February 14, 2024 Planning Commission Meeting Minutes.

County of Monterey

Government Center - Board Chambers
168 W. Alisal St., 1st Floor
Salinas, CA 93901

Meeting Minutes - Draft

Wednesday, January 31, 2024

9:00 AM

Monterey County Planning Commission

Etna Monsalve, Chair
Martha Diehl, Vice Chair
Melanie Beretti, Secretary

9:00 A.M. - CALL TO ORDER

The meeting was called to order by Chair Monsalve at 9:01 a.m.

PLEDGE OF ALLEGIANCE

The Pledge of Allegiance was led by Commissioner Shaw.

ROLL CALL

Present:
Christine Shaw
Martha Diehl
Paul Getzelman
Ben Work
Francisco Mendoza – Joined using AB 2449 (Just Cause)
Ernesto Gonzalez
Ramon Gomez – Joined using AB 2449 (Just Cause)
Etna Monsalve

Absent:
Amy Roberts
Katharine Daniels

Secretary Beretti reviewed the Zoom protocols.

PUBLIC COMMENTS

Joel Panzer
Cameron Daroczy with the Santa Lucia Conservancy

AGENDA ADDITIONS, DELETIONS AND CORRECTIONS

Commission Clerk, Elizabeth Vasquez informed the Planning Commission of correspondence received and distributed for Agenda Item No. 5 – PLN220106 (Big Sur CG Owner LLC).

COMMISSIONER COMMENTS AND REQUESTS

Commissioner Diehl requested that Staff provide additional information for all Land Use Advisory Committee (LUAC) appointees.

REFERRALS AND OTHER MATTERS

1. **PLANNING COMMISSION REFERRALS**

   Commissioner Diehl requested that Staff update the referral matrix.

   Commissioner Diehl pulled agenda item No. 2 (Appoint Andrea Estrada to the North County Land Use Advisory Committee) from the Consent Agenda. The item was trailed to the end of 'Scheduled Matters'.

APPROVAL OF CONSENT CALENDAR

3. Approval of the August 30, 2023, September 13, 2023, September 27, 2023, November 8, 2023, December 13, 2023, and the January 10, 2024 Planning Commission Meeting Minutes.

Public Comment: None.

It was moved by Commissioner Diehl, seconded by Commissioner Gomez and passed by the following vote to approve Agenda Item No. 3.

AYES: Shaw, Diehl, Work, Getzelman, Mendoza, Gonzalez, Gomez, Monsalve
NOES: None
ABSENT: Roberts, Daniels
ABSTAIN: None

Chair Monsalve informed the Commission, Staff and the Public that the Commission would hear Agenda Item No. 5 and Agenda Item No. 6 before Agenda Item No. 4.

9:00 A.M. – SCHEDULED MATTERS

5. **PLN220106 - BIG SUR CG OWNER LLC**

Public hearing to consider Big Sur Campgrounds & Cabins improvements including a replacement septic system, rearrangement of existing visitor serving accommodations/camp sites (no increase), demolition of approximately 14,704 square feet of existing campground common spaces and construction of approximately 10,491 square feet of campground common space including a 70 square foot gatehouse, 1,020 square foot campground general store, 2,131 square foot registration and office, 4,987 square foot campground café, 1,578 square foot recreational room, and 705 square foot guest services building. The Proposed Project includes development within 100 feet of Environmentally Sensitive Habitat Areas, 750 feet of known archaeological resources, and on slopes exceeding 30 percent. Associated improvements include approximately 150,608 square feet of habitat restoration and 5,135 cubic yards of grading.

Project Location: 47000 Highway 1, Big Sur, Big Sur Coast Land Use Plan.

Proposed CEQA Action: Adopt a Mitigated Negative Declaration pursuant to section 15074 of the CEQA Guidelines.

Fionna Jensen, project planner requested a continuance to a date uncertain to allow for applicant to continue discussion with California Coastal Commission Staff.

Applicant's Representative: None

Public Comment: None

It was moved by Commissioner Diehl, seconded by Commissioner Getzelman

and passed by the following vote to continue the hearing on this item to a date uncertain.

AYES: Shaw, Diehl, Work, Getzelman, Mendoza, Gonzalez, Gomez, Monsalve
NOES: None
ABSENT: Roberts, Daniels
ABSTAIN: None

6. PLN210339 - PLP PAJARO LLC

Adopt a Resolution to:

a. Deny the appeal of Mark Blum on behalf of PLP Pajaro LLC from the March 31, 2023 Department of Housing and Community Development (HCD) Chief of Planning's decision on Parcel Legality Status Determination (Planning File No. PLN210339 - PLP PAJARO LLC);

b. Find that denial of the appeal is Statutorily Exempt per California Environmental Quality Act (CEQA) Guidelines California Code of Regulations (CCR) Section 15270(a) - CEQA does not apply to projects which a public agency rejects or disapproves; and that issuance of a single UCOC is not a project pursuant to CEQA Guidelines CCR Section 15378(b)(5) because it is an administrative activity that will not result in direct or indirect physical changes in the environment.

c. Authorize the Director of the Department of Housing and Community Development (HCD) to issue a single Unconditional Certificate of Compliance (UCOC) for the Subject Property and record the UCOC with the County Recorder.

Project Name: PLP Pajaro LLC
File Number: PLN210339
Project Location: End of Wells Road off of Hudson Landing Road, Royal Oaks
Proposed CEQA Actions: Find that denial of the appeal is Statutorily Exempt per CEQA Guidelines CCR Section 15270(a) - CEQA does not apply to projects which a public agency rejects or disapproves; and that issuance of a single UCOC is not a project pursuant to CEQA Guidelines CCR Section 15378(b)(5) because it is an administrative activity that will not result in direct or indirect physical changes in the environment.

Mary Israel, project planner requested a continuance to a date certain of April 10, 2024, on behalf of Mark Blum, Applicant Representative.

Applicant Representative: Mark Blum

Public Comment: Margie Kay

It was moved by Commissioner Gomez, seconded by Commissioner Mendoza and passed by the following vote to continue the hearing in the item to a date certain of April 10, 2024.

AYES: Shaw, Diehl, Work, Getzelman, Mendoza, Gonzalez, Gomez, Monsalve
NOES: None
ABSENT: Roberts, Daniels

ABSTAIN: None

4. PLN230144 - MARTIGNONI CAROL J TR (EPIC WIRELESS)

Public hearing to consider installation of a 95 foot high monopole with 15 panel antennas, 15 remote radio heads (RRH), a standby emergency diesel generator, associated power and telco connection equipment all located within a 600 square foot area surrounded by a 6 foot high chain-link fence.

Project Location: 26775 Old Stage Rd, Gonzales

Proposed CEQA Action: Find the project Categorically Exempt per Section 15303 of the CEQA Guidelines

Zoe Zepp, project planner presented the project.

Applicant's Representative: Mark Lobaugh

Public Comment: None

It was moved by Commissioner Work, seconded by Commissioner Getzelman and passed by the following vote to find the project exempt from CEQA pursuant to Section 15303 of the CEQA Guidelines, New Structures, and no exceptions to the exemptions pursuant to section 15300.2 can be made; and approve a Use Permit to allow installation of a new wireless communication facility consisting of a 95 foot high monopole with 15 panel antennas, 15 remote radio heads (RRH), a standby emergency diesel generator, associated power, and telco connection equipment all located within a 600 square foot area surrounded by a 6 foot high chain-link fence.

AYES: Shaw, Diehl, Work, Getzelman, Mendoza, Gonzalez, Gomez, Monsalve
NOES: None
ABSENT: Roberts, Daniels
ABSTAIN: None

2. Appoint Andrea Estrada to the North County Land Use Advisory Committee.

The Commission requested that Staff add the Statement of Interest of the appointee be added to the Planning Commission agenda.

It was moved by Commissioner Shaw, seconded by Commissioner Mendoza and passed by the following vote to continue the appointment of Andrea Estrada to the meeting on February 14, 2024.

AYES: Shaw, Diehl, Work, Getzelman, Mendoza, Gonzalez, Gomez, Monsalve
NOES: None
ABSENT: Roberts, Daniels

ABSTAIN: None

DEPARTMENT REPORT

Secretary Beretti informed the Commission of the Board of Supervisors continuance to March 26, 2024, of the Garrapata Bridge Project with the intent to deny and that the Ag Mitigation Ordinance is scheduled to go before the Board of Supervisors on February 27, 2024.

Secretary Beretti informed the Commission that the February 14, 2024, Planning Commission meeting will begin at 1:00 p.m. with a recess for dinner with the intent to reconvene at 5:30 p.m.

ADJOURNMENT

The meeting was adjourned by Chair Monsalve at 10:06 a.m.

County of Monterey

Government Center - Board Chambers
168 W. Alisal St., 1st Floor
Salinas, CA 93901

Meeting Minutes - Draft

Wednesday, February 14, 2024

1:00 PM

Monterey County Planning Commission

1:00 P.M. - CALL TO ORDER

The meeting was called to order by Commissioner Diehl at 1:06 p.m.

PLEDGE OF ALLEGIANCE

The Pledge of Allegiance was led by Commissioner Mendoza.

ROLL CALL

Present:
Christine Shaw
Martha Diehl
Ben Work – Joined meeting using AB 2449 (Just Cause)
Francisco Mendoza
Ernesto Gonzalez
Ramon Gomez
Etna Monsalve (arrived at 1:10 p.m.)
Amy Roberts
Katharine Daniels

Absent:
Paul Getzelman

Secretary Beretti reviewed the Zoom protocols.

PUBLIC COMMENTS

None

AGENDA ADDITIONS, DELETIONS AND CORRECTIONS

Commission Clerk, Elizabeth Vasquez informed the Planning Commission of correspondence received and distributed for Agenda Item No. 3 – REF210024 (Big Sur Coast Land Use Plan Update), Agenda Item No. 4 – PLN230138 (Van Ess Properties LLC), and Agenda Item No. 6 – PLN200203 (Anthony Nicola Inc.)

COMMISSIONER COMMENTS AND REQUESTS

None

APPOINTMENTS

1. **Appoint Andrea Estrada to the North County Land Use Advisory Committee.**

   Public Comment: None

   It was moved by Commissioner Shaw, seconded by Commissioner Mendoza and passed by the following vote to appoint Andrea Estrada to the North County Land Use Advisory Committee.

AYES: Shaw, Diehl, Work, Mendoza, Gonzalez, Gomez, Roberts, Daniels
NOES: None
ABSENT: Getzelman, Monsalve
ABSTAIN: None

Commissioner Monsalve arrived at 1:10 p.m.

1:00 P.M. – SCHEDULED MATTERS

2. MONTEREY COUNTY PLANNING COMMISSION

Planning Commission Nomination Committee presents nomination to elect for 2024 Chair and Vice Chair.

Commissioner Mendoza informed the Commission that the nomination Committee are nominating Commissioner Diehl as Chair and Commissioner Gonzalez as Vice Chair.

Public Comment: None

It was moved by Commissioner Mendoza, seconded by Commissioner Gomez and passed by the following vote to appoint Commissioner Diehl as Chair and Commissioner Gonzalez as Vice Chair.

AYES: Shaw, Diehl, Work, Monsalve, Mendoza, Gonzalez, Gomez, Roberts, Daniels
NOES: None
ABSENT: Getzelman
ABSTAIN: None

3. REF210024 - BIG SUR COAST LAND USE PLAN UPDATE

a. Conduct a public workshop to review and receive public input regarding the Ad Hoc Committee's proposed updates to the Big Sur Coast Land Use Plan; and
b. Provide direction to staff.
Project Location: Big Sur Coastal Planning Area
Proposed CEQA action: A planning workshop is statutorily exempt per CEQA 15262.

Taylor Price, project planner presented the item.

Public Comment: Steve Beck, Marcus Foster, Michael Capplin, Rayner Marx, Kerri Frangioso, Phil Talbrook, Patte Kroulund, Angus Jeffers, Ben Perlmutter, Patrick Orosco, Christina McGinnis, Rachel Goldberge, Colin Twohig

Commissioner Monsalve left the meeting at 3:05 p.m.

It was moved by Commissioner Gomez, seconded by Commissioner Gonzalez and passed by the following vote to continue the workshop on this item to the March 27, 2024, Planning Commission meeting.

AYES: Shaw, Diehl, Work, Mendoza, Gonzalez, Gomez, Monsalve, Roberts, Daniels
NOES: None
ABSENT: Getzelman, Monsalve
ABSTAIN: None

The Commission recessed at 3:16 p.m. and returned from break at 3:30 p.m.

All Commissioner present after break except for Commissioner Getzelman and Commissioner Monsalve.

4. PLN230138 - VAN ESS PROPERTIES LLC

Public hearing to consider a lot line adjustment between three legal lots of record containing 10.89 acres, resulting in three parcels containing 3.39 acres [Adjusted Parcel A], 1.77 acres [Adjusted Parcel B], and 5.73 acres [Adjusted Parcel C], and demolition of all structures on Parcel B.
Project Location: 182 and 179 Van Ess Way, Carmel, Carmel Land Use Plan.
Proposed CEQA Action: Find the project Categorically Exempt pursuant to CEQA Guidelines sections 15301(l), 15305(a), and no exceptions pursuant to Section 15300.2 can be made.

Fionna Jensen, project planner presented the item.

Applicant's Representative: Aengus Jeffers

Public Comment: James Rossen

It was moved by Commissioner Roberts, seconded by Commissioner Mendoza and approved by the following vote to continue the hearing on this item to a date certain of February 28, 2024, with the recommendation that Staff return with a resolution of intent to approve the approval of the lot line adjustment of lots A and B along with the demolition of the structures, excluding the approval of lot C.

AYES: Shaw, Work, Mendoza, Gonzalez, Gomez, Monsalve, Roberts, Daniels
NOES: Diehl
ABSENT: Getzelman, Monsalve
ABSTAIN: None

5. PLN200251 - MCATA LLC

Public hearing to consider allowing construction of a 7,442 square foot single family dwelling, inclusive of a 598 square foot garage and 518 square feet basement, and associated site improvements including a driveway, pool, and grading consisting of approximately 2,030 cubic yards of cut and 280 cubic yards of fill. The project would include 6,152 square feet of development on slopes exceeding 30 percent, development within 750 feet of known archaeological resources, and removal of 25 protected trees (20 Coast live oak and 5 Monterey pine, 2 of which are landmark trees).
Project Location: 3347 17 Mile Drive, Pebble Beach, Del Monte Forest Land Use Plan, Coastal Zone
Proposed CEQA action: Find that the project qualifies for a Class 3 Categorical Exemption pursuant to CEQA Guidelines section 15303, and none of the exceptions from section 15300.2 apply to the project.

Phil Angelo, project planner presented the item.

COMMISSION BREAK

The Commission recessed at 5:00 p.m. and returned at 5:40 p.m.

All Commissioners present after break except for Commissioner Shaw, Commissioner Monsalve, and Commissioner Getzelman.

5:30 P.M. - CALL TO ORDER

ROLL CALL

Present:
Martha Diehl
Ben Work – Joined using AB 2449 (Just Cause)
Francisco Mendoza
Ernesto Gonzalez
Ramon Gomez
Amy Roberts
Katharine Daniels

Absent:
Etna Monsalve
Paul Getzelman
Christina Shaw

5:30 P.M. - SCHEDULED MATTERS CONTINUED

The Commission continued with Agenda Item No. 5 – PLN200251 – MCATA LLC, already in progress before break.

Applicant's Representative: Erik Miller

Public Comment: None

It was moved by Commissioner Gomez seconded by Commissioner Mendoza and passed by the following vote to continues the hearing on this item to a date certain of April 10, 2024.

AYES: Shaw, Diehl, Work, Mendoza, Gonzalez, Gomez, Roberts, Daniels
NOES: None
ABSENT: Getzelman, Monsalve, Shaw
ABSTAIN: None

Department Report was trailed to the end of the scheduled matters.

6. PLN200203 - ANTHONY NICOLA, INC.

Public hearing to consider demolition of an existing single family dwelling and septic system and construction of two three-story buildings for 34 two-bedroom units and one one-bedroom unit with office totaling approximately 36,200 square feet for use as agricultural employee housing of up to 250 workers, a manager's suite, and three very low income level inclusionary housing units. The project also includes a Variance for less than 200 feet agricultural buffer.
Project Location: 124 Gonda Street, Royal Oaks
Proposed CEQA action: Adopt a Mitigated Negative Declaration

Mary Israel, project planner presented the item.

Applicant's Representative: Cody Phillips, Anthony Nicola

Public Comment: Robert Kall

It was moved by Commissioner Gonzalez, seconded by Commissioner Mendoza and passed by the following vote to continue the hearing on this item to a date certain of April 10, 2024.

AYES: Diehl, Work, Mendoza, Gonzalez, Gomez, Roberts, Daniels
NOES: None
ABSENT: Getzelman, Monsalve, Shaw
ABSTAIN: None

DEPARTMENT REPORT

None

ADJOURNMENT

The meeting was adjourned by Commissioner Diehl at 8:50 p.m.

Introduced: 3/5/2024
Version: 1

Current Status: Agenda Ready
Matter Type: Planning Item

PLN220063 - CUCCIA COLETTE TR
Public hearing to consider transient use of an existing house and cabin for remuneration (home-stay Short-Term Rental).
Project Location: 28180 Robinson Canyon Rd., Carmel
Proposed CEQA Action: Find the project Categorical Exempt pursuant to CEQA Guidelines Section 15301 and that none of the exceptions listed in Section 15300.1 can be made.

RECOMMENDATION:
It is recommended that the Planning Commission continue the hearing to a date uncertain due to the applicant's personal schedule conflicts and to allow staff time to confirm all structures on the parcel were previously permitted.

PROJECT INFORMATION:
Agent: None
Property Owner: Colette Cuccia
APN: 416-025-008-000
Zoning: LDR/2.5-D-S-RAZ (Low Density Residential 1.5 acres per unit with Design Control, Site Review and Residential Allocation Zoning overlay districts)
Plan Area: Carmel Valley Master Plan

SUMMARY:
The applicant is proposing to permit transient use of a residential property (single family dwelling and cabin/guesthouse) for remuneration. Staff requests continuance for two reasons. One is to allow staff additional time for research on the legality of the existing structures. Another is that the applicant requested the hearing be delayed due to personal scheduling conflicts. Staff recommends the Planning Commission grant the continuance to a date uncertain to ensure the applicant will be able to attend and the additional research is fully concluded.

Prepared by: Mary Israel, Supervising Planner, ext. 5183
Reviewed: Anna Ginette Quenga, AICP, Principal Planner
Approved by: Melanie Beretti, AICP, Acting Chief of Planning

cc: Front Counter Copy; Monterey County Regional Fire Protection District; HCD-Environmental Services; HCD-Engineering Services; Environmental Health Bureau; Anna Ginette Quenga, Principal Planner; Colette Cuccia, Property Owner; Laborers International Union of North America (Lozeau Drury LLP); The Open Monterey Project; LandWatch (Executive Director); Planning File PLN220063.

County of Monterey Planning Commission

Item No.2

Board of Supervisors
Chambers
168 W. Alisal St., 1st Floor
Salinas, CA 93901

March 13, 2024

Agenda Item No. 2

Legistar File Number: PC 24-021

Introduced: 3/5/2024
Version: 1

Current Status: Agenda Ready
Matter Type: Planning Item

PLN220063 - CUCCIA COLETTE TR
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PROJECT INFORMATION:
Agent: None
Property Owner: Colette Cuccia
APN: 416-025-008-000
Zoning: LDR/2.5-D-S-RAZ (Low Density Residential 1.5 acres per unit with Design Control, Site Review and Residential Allocation Zoning overlay districts)
Plan Area: Carmel Valley Master Plan

SUMMARY:
The applicant is proposing to permit transient use of a residential property (single family dwelling and cabin/guesthouse) for remuneration. Staff requests continuance for two reasons. One is to allow staff additional time for research on the legality of the existing structures. Another is that the applicant requested the hearing be delayed due to personal scheduling conflicts. Staff recommends the Planning Commission grant the continuance to a date uncertain to ensure the applicant will be able to attend and the additional research is fully concluded.

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cc: Front Counter Copy; Monterey County Regional Fire Protection District; HCD-Environmental Services; HCD-Engineering Services; Environmental Health Bureau; Anna Ginette Quenga, Principal Planner; Colette Cuccia, Property Owner; Laborers International Union of North America (Lozeau Drury LLP); The Open Monterey Project; LandWatch (Executive Director); Planning File PLN220063.

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Introduced: 3/7/2024
Version: 1

Current Status: Agenda Ready
Matter Type: Planning Item

PLN150372 - RIVER VIEW AT LAS PALMAS LLC

Continued from the November 8, 2023 Planning Commission hearing, consider a recommendation to the Board of Supervisors on the River View at Las Palmas Residential Subdivision, that it:

a. Certify the Final Subsequent Environmental Impact Report (SEIR), as augmented September 2023, based on the findings and evidence, and adopt a Statement of Overriding Considerations;
b. Adopt an amendment to the text of the Las Palmas Ranch Specific Plan (LPRSP) to:
    1. Increase the unit cap from 1,031 to 1,058, to allow for an additional 27 residential lots on Parcel Q;
    2. Add a new Policy 12 in Chapter II, Section C, specifying that Parcel Q shall require 25% of new housing units as affordable, 15% of which shall be on-site and available to moderate-income households and the remaining 10% of which shall be provided through payment of an in-lieu fee;
c. Approve a vesting Tentative Map to create 27 residential lots, including four moderate income units, and an open space parcel; and
d. Approve a Use Permit to allow development on slopes in excess of 25%.

Project Location: Vacant 15.64-acre lot within Las Palmas Subdivision #1, south of River Road and west of Country Park Road, within the Las Palmas Ranch Specific Plan area in the Toro Area Plan approximately 1.25 miles west of Spreckels and 0.5 miles east of State Highway 68.

Proposed CEQA action: Recommend the Board of Supervisors certify the Final Subsequent Environmental Impact Report, adopt a Statement of Overriding Considerations, and adopt a Mitigation Monitoring and Reporting Plan.

RECOMMENDATION:

It is recommended that the Planning Commission adopt a resolution recommending the Board of Supervisors:

a. Certify the Final Subsequent Environmental Impact Report (SEIR), as augmented September 2023, based on the findings and evidence, and adopt a Statement of Overriding Considerations;
b. Adopt a resolution to amend the text of the Las Palmas Ranch Specific Plan (LPRSP) to:
    1. increase the unit cap from 1,031 to 1,058, to allow for an additional 27 residential lots on Parcel Q; and
    2. Add a new Policy 12 in Chapter II, Section C, specifying that Parcel Q shall require 25% of new housing units as affordable, 15% of which shall be on-site and available to moderate-income households and the remaining 10% of which shall be provided through payment of an in-lieu fee; and

c. Adopt a resolution to approve a Combined Development Permit consisting of:
    1. A Vesting Tentative Map to subdivide a 15.64-acre parcel into 27 residential lots, including four moderate income units and an open space parcel;
    2. Use Permit to allow development on slopes exceeding 25 percent; and
    3. Adopt a Mitigation Monitoring and Reporting Plan.

The draft Planning Commission resolution (**Exhibit B**), including draft Board of Supervisors resolutions (**Attachment 1 - CEQA, Attachment 2 - Specific Plan Amendment, and Attachment 3 - Combined Development Permit**) is provided for consideration. Staff recommends approval of the recommendation to the Board of Supervisors subject to 36 conditions, including 18 mitigation measures, which are fully set forth in **Attachment 3**.

PROJECT INFORMATION:

Owner: River View at Las Palmas LLC
Agent: Anthony Lombardo & Associates
APN: 139-211-035-000
Zoning: Medium Density Residential, 2.61 units per acre with a Design Control District or "MDR/2.61-D"
Parcel Size: 15.64 acres
Plan Area: Toro Area Plan
Flagged and Staked: Yes
Project Planner: Zoe Zepp, Assistant Planner
(831) 755-5198
zeppz@co.monterey.ca.us

PROJECT SUMMARY/DISCUSSION:

The subject property is a 15.64-acre parcel within Las Palmas Subdivision #1, approximately 1.25 miles west of Spreckels and 0.5 mile east of State Route 68 (SR 68). Immediate surrounding uses include the existing Las Palmas Subdivision #1, a medium density residential neighborhood to the east; hillside open space to the south; and agricultural land cultivated with row crops to the west and north (across River Road). It is currently undeveloped. See Vicinity Map in **Exhibit H**. Below is a summary of the project background and staff's recommendations for the Commission's consideration. A more detailed discussion is provided in **Exhibit A**.

Background

In 2015, Applicant applied for entitlements to construct a 190,000-square foot senior assisted living facility inclusive of 13 "Casitas", a 27,000-square foot Assisted Living Facility, a 21,600-square foot Memory Care Facility and associated site development, including internal roadways and parking areas. This original application was processed, and a Draft Subsequent Environmental Impact Report (DSEIR) was prepared and circulated for public review. The project was discussed at two Toro Land Use Advisory Committee (LUAC) meetings and two Planning Commission hearings. On February 12, 2020, the Planning Commission adopted Resolution Nos 20-004, 20-005 and 20-006 recommending the Board of Supervisors certify the FSEIR, amend the Las Palmas Specific Plan and approved the project. The project was subsequently heard at three Board of Supervisors hearings and, on October 12, 2021, the Board voted to return the matter to staff for further analysis into the original project with

an expanded look into the EIR, community benefit analysis and housing.

Overall, the senior living facility was disfavored by the Las Palmas #1 Subdivision residents, who expressed their preference for a residential subdivision. Ultimately, the Board voted to continue the project and have staff review the alternatives further to propose a project with less significant potential impacts to the existing neighborhood and offers more affordable housing options.

Return to the Planning Commission on November 8, 2023
Upon consideration of the Board's direction, the applicant submitted a revised project scope consisting of a proposed subdivision that would allow up to 26 residential lots, ranging in size from 4,249 square feet to 11,785 square feet, and an open space parcel. The Planning Commission had concerns regarding the lack of on-site affordable units, significant and unavoidable impacts to SR 68, the draft statement of overriding considerations, and the proximity of the proposed development to a Permanent Grazing (PG) zoning district without a 200-foot buffer. The project was ultimately continued to a date uncertain to allow the applicant and County staff time to address these concerns before receiving a recommendation from the Commission to the Board of Supervisors. The applicants are now proposing a 27 residential lot subdivision with four onsite moderate-income units. To support that proposal, they have provided a justification for the project omitting a buffer between the PG zoned lot and the River View parcel.

Affordable Housing
As requested by the Planning Commission on November 8, 2023, the applicants explored options to offer affordable units onsite as opposed to the originally proposed payment of an in-lieu fee. It was determined to be economically feasible to have four moderate-income units onsite and pay an in-lieu fee for the remaining units of the 25% affordable unit requirement. A detailed discussion is provided in **Exhibit A**.

Density Bonus and Incentive
The applicants have requested an incentive to waive all fees and priority processing for review and approval of the final map, including improvement plans and related documents and building permits for the inclusionary units (see **Exhibit G**, **Appendix B**) pursuant to Monterey County Code Chapter 21.64. However, incentives are only applicable to projects that qualify for a density bonus. By definition, a density bonus is an increase in density over the maximum allowable residential density under the applicable General Plan land use designation and zoning ordinance while taking into account all applicable limitations. The River View property has an allowed density of 2.61 units per acre which would allow 41.2 units. The applicant proposes a 27 lot residential subdivision (a density of 1.8 units/acre). Therefore, the project is not eligible for a density bonus or any associated incentives as it does not exceed the allowed density.

Process
Like the original proposal, the revised project scope would require an amendment to the Las Palmas Ranch Specific Plan. The adopted Las Palmas Ranch Specific Plan has a residential unit cap of 1,031 units and there are currently 3 units remaining. As such, the applicant proposes an amendment to the unit cap to 1,058 to allow 27 additional residential units. In accordance with Monterey County Code and State Planning and Zoning Law, approval of the amendment requires a recommendation from the

Planning Commission and final approval by the Board of Supervisors. Therefore, staff recommends the Commission consider the CEQA document, specific plan amendment, subdivision request, proposed development on slopes, and adopt the draft resolution (**Exhibit B**) recommending the Board take final action on the project as a whole.

ENVIRONMENTAL REVIEW:

A Draft Subsequent Environmental Impact Report (DSEIR) (**Exhibit F**) was prepared and circulated for public review in 2018. A Final SEIR (**Exhibit G**) was prepared in 2019. Since the Board did not act on the project in 2021, the FSEIR was not certified. Both the DSEIR and FEIR analyzed the project, the senior care facility, and provided an alternatives analysis pursuant to CEQA Guidelines section 15126.6. The alternatives were considered: Alternative 1 - no project/no development; Alternative 2 - no project/minimum use; Alternative 3 - no project/existing zoning; and Alternative 4 - reduced project. Alternative 3 assumed that based on the site's land use designation, Residential - Medium Density 2.61 units per acre, and accompanying zoning, it would be reasonable that up to 40 dwelling units could be approved on the site.

Augmentation to the River View FSEIR

After the 2021 Board direction and the applicant's revision to the project scope, the River View FSEIR was updated (see Augmentation to the FSEIR, **Exhibit H**). This augmentation updated the Project Objectives, clarifying that the applicant's objectives were to provide: a range of housing and/or care options for persons who do not require 24-hour skilled nursing care; housing in/near an established community; and to address the need for housing. The augmentation also updated the alternatives analysis, identifying Alternative 3a as the no project/existing zoning (previous Alternative 3, up to 40-lot residential subdivision) and Alternative 3b - reduced no project/existing zoning which would allow up to a 30-lot residential subdivision.

Proposed Project - Residential Subdivision with up to 30 Lots: Alternative 3b

The current project scope, the creation of 27 residential lots and an open space parcel, meets the FSEIR's Project Objectives, The augmentation analyzed this project scope as Alternative 3b. Compared to the senior living facility, this alternative would have reduced impacts for aesthetics (including the State Route 68 viewshed), air quality, traffic, biological resources, water supply and would have less greenhouse gas emissions, compared to the original proposal.

Recirculation

The FSEIR, including the September 2023 augmentation, did not warrant recirculation because the augmentation did not include significant new information, would not result in a substantial increase in the severity of potential environmental impacts, project alternatives or mitigation measures that are considerably different from those previously reviewed, and because the augmentation was not fundamentally or basically inadequate in nature. As discussed above, Alternative 3b is a reduced version of Alternative 3, a 40-lot residential subdivision, which was included in the FSEIR and evaluated therein prior to the augmentation.

OTHER AGENCY INVOLVEMENT:

The following agencies or departments have reviewed the project:

Monterey County Regional Fire District
CalFire
Monterey County Sheriff's Office
Monterey County Water Resources Agency
HCD-Engineering Services
HCD-Environmental Services
Monterey County Environmental Health Bureau
Monterey County Housing Office

LAND USE ADVISORY COMMITTEE:
The project was referred to the Toro Land Use Advisory Committee (LUAC) for review on October 23, 2023. As demonstrated in Finding 1, Evidence "q" of the attached draft resolution for the Combined Development Permit (**Exhibit B**, **Attachment 3**), the LUAC recommended approval of the project and concerns from the public have been addressed. Minutes of the meeting are provided in **Exhibit D**.

Prepared by: Zoe Zepp, Assistant Planner
Reviewed by: Anna Ginette Quenga, AICP, HCD Principal Planner
Approved by: Melanie Beretti, AICP, Acting Chief of Planning

The following attachments are on file with the HCD:
Exhibit A - Discussion
Exhibit B - Draft Planning Commission Resolution Recommending the Board of Supervisors adopt the following:
- Attachment 1 - Draft CEQA Resolution
- Attachment 2 - Draft Las Palmas Ranch Specific Plan Amendment Resolution
  - Attachment 2a - Draft Text of Las Palmas Ranch Specific Plan Amendment
- Attachment 3 - Draft Combined Permit Resolution
  - Attachment 3a - Draft Conditions of Approval
  - Attachment 3b - Vesting Tentative Map

Exhibit C - Las Palmas Ranch Specific Plan (adopted September 1983)
Exhibit D - Toro Land Use Advisory Committee Minutes (October, 23, 2023)
Exhibit E - Draft Subsequent Environmental Impact Report
Exhibit F - Final Subsequent Environmental Impact Report
Exhibit G - Augmentation to the Final Subsequent Environmental Impact Report
- Appendix A - Traffic Analysis
- Appendix B - Twenty-Six Lot Narrative

Exhibit H - Vicinity Map
Exhibit I - Comment Letter

cc: Front Counter Copy; Planning Commission; Craig Spencer, Acting HCD Director; Anna Quenga, HCD-Principal Planner; Zoe Zepp, Project Planner; HCD - Engineering Services; Environmental Health Bureau; HCD Environmental Services; Monterey County Regional Fire Protection District;

CalFire; River View at Las Palmas LLC, Applicant/Owner; Anthony Lombardo and Associates, Agent; The Open Monterey Project; LandWatch; Christine Kemp, Attorney representing the Las Palmas Ranch Master Association No. 1; Pam Silkwood, Attorney representing residents of the Las Palmas subdivision; The Open Monterey Project; LandWatch (Executive Director); Lozeau Drury LLP; Planning File PLN150372

County of Monterey Planning Commission

Item No.3

Board of Supervisors
Chambers
168 W. Alisal St., 1st Floor
Salinas, CA 93901

March 13, 2024

Agenda Item No. 3

Legistar File Number: PC 24-026

Introduced: 3/7/2024 **Current Status:** Agenda Ready

Version: 1 **Matter Type:** Planning Item

PLN150372 - RIVER VIEW AT LAS PALMAS LLC

Continued from the November 8, 2023 Planning Commission hearing, consider a recommendation to the Board of Supervisors on the River View at Las Palmas Residential Subdivision, that it:

a. Certify the Final Subsequent Environmental Impact Report (SEIR), as augmented September 2023, based on the findings and evidence, and adopt a Statement of Overriding Considerations;
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c. Approve a vesting Tentative Map to create 27 residential lots, including four moderate income units, and an open space parcel; and
d. Approve a Use Permit to allow development on slopes in excess of 25%.

Project Location: Vacant 15.64-acre lot within Las Palmas Subdivision #1, south of River Road and west of Country Park Road, within the Las Palmas Ranch Specific Plan area in the Toro Area Plan approximately 1.25 miles west of Spreckels and 0.5 miles east of State Highway 68.

Proposed CEQA action: Recommend the Board of Supervisors certify the Final Subsequent Environmental Impact Report, adopt a Statement of Overriding Considerations, and adopt a Mitigation Monitoring and Reporting Plan.

RECOMMENDATION:

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Agent: Anthony Lombardo & Associates
APN: 139-211-035-000
Zoning: Medium Density Residential, 2.61 units per acre with a Design Control District or "MDR/2.61-D"
Parcel Size: 15.64 acres
Plan Area: Toro Area Plan
Flagged and Staked: Yes
Project Planner: Zoe Zepp, Assistant Planner
(831) 755-5198
zeppz@co.monterey.ca.us

PROJECT SUMMARY/DISCUSSION:

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CalFire
Monterey County Sheriff's Office
Monterey County Water Resources Agency
HCD-Engineering Services
HCD-Environmental Services
Monterey County Environmental Health Bureau
Monterey County Housing Office

LAND USE ADVISORY COMMITTEE:
The project was referred to the Toro Land Use Advisory Committee (LUAC) for review on October 23, 2023. As demonstrated in Finding 1, Evidence "q" of the attached draft resolution for the Combined Development Permit (**Exhibit B**, **Attachment 3**), the LUAC recommended approval of the project and concerns from the public have been addressed. Minutes of the meeting are provided in **Exhibit D**.

Prepared by: Zoe Zepp, Assistant Planner
Reviewed by: Anna Ginette Quenga, AICP, HCD Principal Planner
Approved by: Melanie Beretti, AICP, Acting Chief of Planning

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  - Attachment 3b - Vesting Tentative Map

Exhibit C - Las Palmas Ranch Specific Plan (adopted September 1983)
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- Appendix A - Traffic Analysis
- Appendix B - Twenty-Six Lot Narrative

Exhibit H - Vicinity Map
Exhibit I - Comment Letter

cc: Front Counter Copy; Planning Commission; Craig Spencer, Acting HCD Director; Anna Quenga, HCD-Principal Planner; Zoe Zepp, Project Planner; HCD - Engineering Services; Environmental Health Bureau; HCD Environmental Services; Monterey County Regional Fire Protection District;

CalFire; River View at Las Palmas LLC, Applicant/Owner; Anthony Lombardo and Associates, Agent; The Open Monterey Project; LandWatch; Christine Kemp, Attorney representing the Las Palmas Ranch Master Association No. 1; Pam Silkwood, Attorney representing residents of the Las Palmas subdivision; The Open Monterey Project; LandWatch (Executive Director); Lozeau Drury LLP; Planning File PLN150372

Exhibit A

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ATTACHMENT A
PROJECT DISCUSSION

Las Palmas Ranch Specific Plan

The Las Palmas Ranch Specific Plan (LPRSP) was adopted by the Board of Supervisors on September 20,1983. Pursuant to Government Code section 65451, specific plans shall detail the distribution, location and extent of land use, infrastructure, open space and sets forth standards and criteria for development, conservation, and financing. The 4 main functions of the LPRSP are: to present the goals of the developer, describe and illustrate design construction concepts for Las Palmas which are consistent with policies of the General Plan, set forth procedures to be utilized by the County to implement the specific plan policies and concepts, and describe non-regulatory implementation tools needed to achieve the goals of the developer and the County.

The specific plan allowed up to 1,031 residential units to be built in 9 identified areas. Residential development was intended to be phased to allow the incremental provision of infrastructure, recreation and open space. LPR SP Chapter II, Section C Policy 11 states that "[A] Development Incentive Zone of ten acres shall be provided within the areas designated in the specific plan for medium density residential development. The density for this DIZ shall not exceed ten units per acre. This density may be and is encouraged to be dispersed throughout the medium density areas rather than being concentrated in a single ten-acre area." As illustrated in LRP SP Figure E, the subject property is designated as "Medium Density Residential" (see **Figure 1** below). In accordance with this policy, could support up to 156 units.

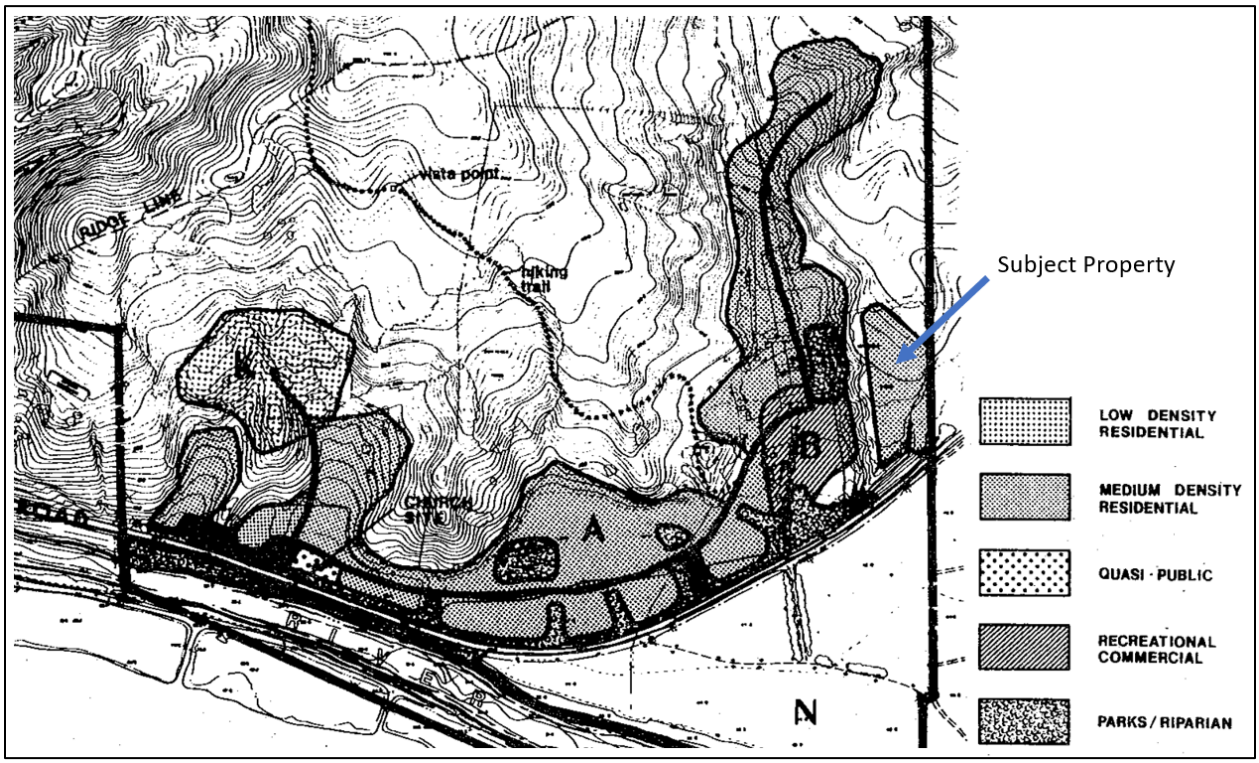

Figure 1. Blow Up of LPRSP Figure E

General Project Description
The project, as originally proposed, consisted of the establishment of an approximately 190,000 square-foot senior assisted living facility with multiple structures and site improvements and development on slopes in excess of 25% on an approximately 15.64-acre site, located south of River Road, approximately 0.5 mile east of State Route (SR) 68 and immediately north of existing residential development along Woodridge Court and Country Park Road, in unincorporated Monterey County. In 2021, the Board of Supervisors referred the application to staff to allow the applicant to explore development alternatives, such as providing housing.

The applicant considered this direction and modified the project scope. On November 8, 2023, the Planning Commission considered a proposed amendment to the Las Palmas Ranch Specific Plan (LPR SP) to allow an additional 30 residential units, a Vesting Tentative Map to allow a subdivision resulting in 26 residential lots and an open space parcel, and a Use Permit to allow development on slopes in excess of 25%. At the public hearing, the Planning Commission brought up concerns with the proposal, including lack of inclusionary housing opportunities, insufficient overriding considerations for the Project's unavoidable impact to SR 68 and the proposed subdivision's proximity to the adjacent Permanent Grazing zoned parcel and failure to seek a Variance to the 200 foot agricultural buffer. The Planning Commission continued the hearing to a date uncertain to allow the applicant the opportunity to address these concerns before making a recommendation to the Board of Supervisors.

With direction from the Planning Commission, the applicant has revised its scope of work to include four onsite moderate income units. The proposed project now includes a 27 lot residential subdivision, including four moderate income units, and an open space parcel as well as an amendment to the Las Palmas Specific Plan and development on slopes in excess of 25%. The proposed residential lot sizes vary between 3,400 square feet and 11,785 square feet; the median lot size would be 5,796 square feet. The proposed lots are clustered in the interior of the parcel pursuant to Section 21.12.060.A of the Monterey County Zoning Ordinance, Title 21. The subdivided parcels would encompass approximately 160,000 square feet of the project site. However, due to site coverage and setback limits, less than 160,000 square feet of the project site would be developed with residences with the remainder would be left as open space.

Similar to the originally proposed project, the residential subdivision would be accessible via Woodridge Court and a new residential roadway, portions of which would be constructed on slopes in excess of 25%. The internal roadway network includes 13 off-street guest parking spaces (not associated with a specific residence). Water, sewer, electricity, and natural gas would be provided by the same purveyors as proposed under the original project. Subdivision improvements would require the removal of approximately 70 eucalyptus trees. These trees are not protected and do not require a permit for their removal. Although vertical construction is not proposed at this time, future residences would be restricted to a maximum height of 20 feet from average natural grade, which is less than the maximum allowable building height of 30 feet from average natural grade pursuant to the development standards within Title 21 section 21.12.060.

Las Palmas Ranch Specific Plan Amendment
The proposed development was analyzed for consistency with the LPR SP. Overall, the project is consistent with the goals, objective and polices pertaining to housing and residential land use;

circulation; open space; energy conservation; preservation of significant agricultural land; design and sensitivity; erosion, drainage and flood control; public facilities and services. However, as discussed below, two topic areas of the LPR SP will need to be amended in order to achieve vertical consistency with the 2010 General and Monterey County Code.

Allowed Units
The Toro Area Plan Land Use Plan Figure LU10 designates the subject property as Residential – Medium Density 2.61 Units/Acre and zoning is Medium Density Residential, 2.61 units per acre. Therefore, subdivision of the 15.64-acre parcel into 27 residential lots and one open space parcel is consistent with the land use designation, zoning and allowed density. As discussed above, the LPRSP contemplated development on the subject property. However, due to reallocation of residential units within the different designated plan areas, only 3 units remain allowable. Therefore, in order to allow the proposed project, an amendment to the LPR SP is necessary. As described in the Draft Specific Plan Amendment Resolution (**Exhibit B**, **Attachment 2**), the applicant proposes to amend Chapter II, Section C, Policy 5 and Figures D (Las Palmas Ranch Specific Plan Land Use Table), E (Land Use Designation Map) and H (Frontal Slopes).

Inclusionary Housing Requirements
Appendix A of the LPR SP includes development criteria for the River Road Area of Development Concentration (ADC). Section C.4 of Appendix A states new residential subdivisions within the River Road ADC shall provide at least 15% of their units for families of low or moderate income. Although the applicant proposes to provide a combination of on-site inclusionary units and a payment of in-lieu fees which exceed the 15% required by the plan, language in the LPR SP should be amended to achieve vertical consistency between the 2010 General Plan, LPR SP, and Monterey County Code (MCC) Chapter 18.40 – Inclusionary Housing Ordinance of the County of Monterey.

Monterey County 2010 General Plan Policy LU-2.13 requires the assurance of the consistent application of an Affordable Housing Ordinance. This policy requires 25% of new housing units be affordable and that an Affordable Housing Ordinance include the minimum requirement to provide 6% of the units for very low-income households, 6% of the units to low-income households, 8% of the units for moderate income households, and 5% of the units for Workforce I income households.

As of this date, an Affordable Housing Ordinance implementing Policy LU-2.13 has not been adopted; the current ordinance is codified in MCC Chapter 18.40. MCC section 18.40.070.A requires that 20% of units approved by inclusionary and MCC section 18.40.110.B.1 requires that 8% be set aside for moderate income households, 6% be set aside for low-income households, and 6% be set aside for very low-income households.

As discussed in the **Inclusionary Housing** discussion below, the applicant proposes to provide 25% of the units as affordable, consistent with General Plan Policy LU-2.13 and in excess of the minimum requirement of the LPR SP (15%) and MCC Chapter 18.40 (20%). The applicant proposes to provide 4 moderate income units onsite and pay an in-lieu fee for the remaining 2.50 units. This distribution of unit type is inconsistent with General Plan Policy LU-2.13, consistent with the LRP SP, and inconsistent with MCC Chapter 18.40.

The discussion below also demonstrates that here, there is evidence to support modifying the distribution type within the subdivision. Due to land and construction costs in the area, and percentage of income allotted to housing by income type, the subsidy would increase by approximately 60% (from $1,081,925 to $1,734,968) to provide the necessary housing types based on distribution.

The maximum percent of income allocated to housing also presents a hardship for home buyers. In order to qualify for very-low income, a family of 4 cannot earn more than 50% of the median income, or $50,200, and for low-income, a family of 4 cannot earn more than 70%, or $70,280. Based on the amounts listed in **Table 1**, very-low-income families would only have $5,100 per year (or $425/month) available to pay their mortgage after utilities, HOA fees, insurance, and property taxes. Low-income families would only have $10,185 per year, or $848. In the LPR SP area, other housing expenses make up more than 50% the income allocation, leaving less of their income to go towards equity and housing upgrades that would improve their quality of living.

As provided in Recital 9 of the draft LPR SP amendment resolution (Exhibit B, Attachment 2), staff proposes that Chapter II, Section C – Housing & Residential Land Use include a new Policy 12 specifying that Parcel Q shall require 25% of new housing units as affordable, 15% of which shall be on-site available to moderate-income households, and the remaining 10% shall be provided through payment of an in-lieu fee.

Site Access
Access to the project would be provided from the signalized intersection of River Road and Las Palmas Road to River Run Road, then Woodridge Court, which currently terminates at the project site boundary. River Road is a public road maintained by the County of Monterey. Las Palmas Road, River Run Road, and Woodridge Court are private roads maintained by the Las Palmas Homeowners Association (LPHOA). The project applicants, currently pay a monthly road maintenance fee to the LPHOA. Pursuant to a future private agreement between the applicant and the LPHOA, the applicant would pay a proportionate share for the use of the roads based on construction impacts and operation of the facility. Although the subject property is adjacent to River Road, there is no direct access from River Road to the site, and none is proposed.

Land Use
The 2010 Monterey County General Plan, Toro Area Plan, Las Palmas Ranch Specific Plan, and Title 21 designate the project site as Medium Density Residential (MDR). The MDR designation is appropriate for a range of residential uses and housing types, recreational, public, and quasi-public, and other uses that are incidental and subordinate to the residential use and character of the area (General Plan Policy LU-2.33a). The proposed subdivision is consistent with existing land use designation and zoning. However, construction of subdivision improvements require approval of a Use Permit to allow development on slopes exceeding 25%.

The MDR district (Title 21 section 21.12.060.A) requires a minimum building site of 6,000 square feet, unless otherwise approved as part of a condominium, planned unit development or similar clustered residential subdivision. As described earlier, there are proposed lots under

6,000 square feet, but the lots have been clustered so that the development and roadways would be located within the center of the lot, leaving a buffer of open space areas. In addition, the project has been conditioned requiring rezoning of the property to include a B-6 overlay, which would prevent lots to be further subdivided. Further, the project is similar in design and density to the Las Palmas Ranch residential neighborhood to the east.

Development on Slopes in Excess of 25%
The proposed development includes internal roadway improvements and underground utilities. Some of these improvements would be on slopes over 25%. The project site is on a plateaued area above, and to the east of, the existing subdivision within Las Palmas #1. The only way to access the site is by traveling up the side of a hillside that is sloped over 25%. The development on slopes has been minimized. It is limited to roadways and underground utilities. There are no feasible alternatives to access this site or provide utilities to the site without developing on slopes. There are no areas within the proposed residential lots that include slopes exceeding 25%. Due to the circumstances of this particular case, staff is able to recommend that the County make the findings necessary to allow the proposed development on slopes.

Design Review & Scenic Resources
The subject property is in a Design Control overlay zoning district. It is visible from a scenic-designated stretch of State Route (SR) 68 for approximately 3,000 feet (0.57 mile). The project site is adjacent to River Road but is minimally visible from this roadway and the River Road/SR 68 intersection, due to existing topography and vegetation. The site is also visible from portions of Reservation Road and the Las Palmas Ranch subdivision. The LPRSP EIR, adopted by the County on September 20, 1983, anticipated that views from River Road would become more urbanized, and that development would be visible from scenic-designated SR 68. The LPRSP EIR established mitigation measures to reduce aesthetic impacts associated with development of the Las Palmas Ranch Specific Plan Area. Those measures, such as tree planting and a River Road setback, are incorporated into the proposed project's plan. Development of the project site, therefore, does not represent a new aesthetic impact not previously been analyzed and found less than significant.

Inclusionary Housing
The applicant proposes a subdivision with 27 new units. Pursuant to MCC section 18.40.050.A, the first by-right unit would be subtracted, resulting in 26 units used to calculate the required amount of affordable housing. Based on General Plan Policy LU-2.13, the minimum required amount would be 1.566 very low-income units, 1.566 low-income units, 2.08 moderate-income units, and 1.30 Workforce I units; totaling 6.50 required inclusionary housing units. The applicant has requested to provide 4 onsite inclusionary housing units and payment of in-lieu fees for the remaining 2.50 units. The onsite inclusionary housing units would be 1,500 square feet and be made available to moderate income households. HCD-Planning and Housing staff considered the proposal and the total percental required consistent with Policy LU-2.13 and the breakdown in units provided consistent with MCC Chapter 18.40.

Using the income levels codified in MCC Chapter 18.40, staff looked at the estimated construction and land cost, a fixed interest rate, utility costs and housing costs. First, staff determined the estimated total cost for a unit within the subdivision. As demonstrated in the

formula below, based on a construction cost of $275 per square foot plus the approximate land cost, calculated at 20% of the construction cost, the total cost for each unit would be $495,000.

Construction Cost	$275	x	1,500 sq ft	=	$412,500
Land Cost	$412,500	x	20%	=	$82,500
			Total	=	**$495,000**

Staff then calculated affordable sales prices of a 3 bedroom single family dwelling for very low-, low- and moderate-income levels (see **Table 1** below). The median income in the area for a 4-person household size is $100,400 annually. In order to qualify as very low, the annual income earned could not exceed 50% of the median income, or $50,200 and only 30% of their annual income can only be allocated to housing, or $15,060. To qualify as low income, the income earned cannot exceed 70%, or $70,280 annually and for moderate, income earned cannot exceed 110%, or $110,440 annually. Only 30%, or $21,080, of low-income annual earnings and 35%, or $38,650, of moderate-income annual earning can be allotted for annual housing, respectively.

Affordable Sales Price Calculations for a 3-Bedroom Single Family Dwelling

	Very-low Income	Low Income	Moderate Income
Income			
Benchmark Household Size	4	4	4
HCD Median Income By HH Size	$100,400	$100,400	$100,400
% of HCD Median Income	50%	70%	110%
% of Income Allocated to Housing	30%	30%	35%
Income Allotted to Housing	$15,060	$21,080	$38,650
Ongoing Expenses			
Utility Allowances[1]	$5,400	$5,400	$5,400
HOA/Insurance/Maintenance/Other	3,600	3,600	3,600
Property Taxes @ 1.25% of Affordable Price	950	1,895	4,650
Total Expenses	$9,950	$10,895	$13,650
Income Available for Mortgage	$5,110	$10,185	$25,000
Affordable Housing Price			
Supportable Mtg @ 6.64% Interest[2]	$ 66,400	$ 132,300	$ 324,900
Home Buyer Down Pymt @ 10% of Affordable Price	$ 7,600	$ 15,200	$ 37,200
Maximum Purchase Price	$ 74,000	$ 147,500	$ 362,100

[1] Based on the Housing Authority of the County of Monterey utility allowances for envery star detached houses effective as of 44927. Includes: electric, heating, electric cooking, other electric, electric water heating, water sewer, and trash.

[2] Based on the Freddie Mac interest rate for the first week of the calendar quarter for a fixed rate mortgage with a 30-year term.

Table 1. Affordable Sales Price Calculation

Ongoing annual housing expenses were then calculated (see Ongoing Expenses) based on the utility allowances from the Housing Authority of Monterey County, Las Palmas HOA fees, and property taxes. These amounts were subtracted from the income allotted to housing to determine

the housing income available for annual mortgage payments. As shown in **Table 1**, very low-income households would have $5,100, low-income households would $10,895, and moderate-income households would have $25,000.

These numbers were then used to calculate the maximum purchase price of a home based on income levels. Using a mortgage constant[1] of 7.70% the supportable mortgage, at a 6.64% interest rate, very low-income households could afford to pay $66,400 annually, low-income households could afford to pay $132,300 annually, and moderate-income households could afford to pay $324,900 annually.

2-Bedroom Affordable Sale Price

VL-Income	Low-Income	Moderate-Income	700 Sq/Ft Est Const. & Land Cost	VL-Income Profit/(Loss)	Low-Income Profit/(Loss)	Moderate-Income Profit/(Loss)
$68,700	$128,100	$301,300	$231,000	($162,300)	($102,900)	$70,300

2-Bedroom Affordable Sale Price

VL-Income	Low-Income	Moderate-Income	1200 Sq/Ft Est Const. & Land Cost	VL-Income Profit/(Loss)	Low-Income Profit/(Loss)	Moderate-Income Profit/(Loss)
$68,700	$128,100	$301,300	$396,000	($327,300)	($267,900)	($94,700)

3 Bedroom Affordable Sale Price

VL-Income	Low-Income	Moderate-Income	900 Sq/Ft Est Const. & Land Cost	VL-Income Profit/(Loss)	Low-Income Profit/(Loss)	Moderate-Income Profit/(Loss)
$66,400	$132,300	$324,900	$297,000	($230,600)	($164,700)	$27,900

3 Bedroom Affordable Sale Price

VL-Income	Low-Income	Moderate-Income	1500 Sq/Ft Est Const. & Land Cost	VL-Income Profit/(Loss)	Low-Income Profit/(Loss)	Moderate-Income Profit/(Loss)
$66,400	$132,300	$324,900	$495,000	($428,600)	($362,700)	($170,100)

Table 2. Affordable Sales Price Breakdown

In **Table 2** above, a comparison of 2- and 3-bedroom units, ranging from 700 to 1,500 square feet, is provided that includes the annual supportable mortgage amount relative to the estimated

[1] A mortgage constant is the percentage of money paid each year to pay or service a dept compared to the total value of the loan. It helps determine how much cash is needed annually to service a fixed-rate mortgage loan by dividing the annual debt service for the loan by the total loan value.

construction and land costs and identifying the profit or loss (shown in red) incurred per unit based on the income level. As shown in the table, the most profitable unit for the developer would be the 2-bedroom 700 square foot moderate-income unit ($70,300 profit), the least profitable would be the 3-bedroom 1,500 square foot very low-income unit ($428,600 loss), and the median would be between the 3-bedroom 1,500 square foot moderate-income unit ($170,100) and the 3-bedroom 900 square foot low-income unit ($164,700).

This information was analyzed to determine consistency with 2 specific sections of MCC Chapter 18.40. MCC section 18.40.050.A states that, except as expressly provided in its subsections B and C, all residential developments shall contribute to the provision of housing for very low, low, and moderate income households in the County. MCC section 18.40.050.B.2 exempts certain development from inclusionary requirements, including, that as to which the applicant demonstrates during consideration of a first approval that there is no reasonable relationship between the development and the requirements imposed by this Chapter, that the County's inclusionary housing would take property in violation of the Federal or California Constitution, or that as a result of unusual or unforeseen circumstances, it would not be appropriate to apply, or would be appropriate to modify, the inclusionary housing requirements, provided that the Appropriate Authority make written based on substantial evidence, supporting that determination.

The applicant has requested that the Appropriate Authority find that it is appropriate to modify the requirement to provide 6% low-income on-site units and 6% very low-income on-site units due to unusual (financial) circumstances, Pursuant to MCC section 18.40.070.B.2 and 3, on-site inclusionary units must be compatible in exterior appearance with the other units in the development and contain similar numbers of bedrooms overall as other units in the residential development, with total square footages suitable for the number of bedrooms. As such, the applicant has proposed to provide 4 on-site 3-bedroom 1,500 square foot moderate income housing units, resulting in a loss of $170,100 per unit. As discussed above, for the applicant to meet their total 25% inclusionary housing contribution, they have proposed to pay the remaining 2.5 units in an in-lieu fee payment. Therefore, the total subsidy applied based on their proposal is $1,081,925 ($680,400 for onsite units and $401,525 for in-lieu fee).

If an exception could not be made and the applicant was required to meet its 25% inclusionary housing obligation, the total subsidy could potentially increase to approximately $1,734,968[2]. On the other hand, at the November 8, 2023 Commission hearing, the applicant proposed to provide no onsite inclusionary housing units and pay an in-lieu fee of $923,507.50. Based on the 3 scenarios herein described, the current proposal better meets the purpose and intent of Chapter 18.40, as it provides 4 moderate income housing units onsite and the payment of additional in-

[2] Using a waterfall calculation and adding the remaining 1.30% to the moderate income requirement, the following amounts were accounted for: 1 very low-income unit, 2 low-income units, 3 moderate-income units, and .44 units in an in-lieu fee.

lieu fees increases the availability of funds for very low, low, and moderate income housing projects (MCC section 18.40.020.F).

Las Palmas Ranch Specific Plan
Appendix A of the Las Palmas Ranch Specific Plan (**Exhibit C**) is the River Road Area of Development Concentration (ADC) General Plan Amendment. The River Road ADC (Board Resolution 83-121) establishes development criteria. Section C.4 states that new residential subdivisions within the River Road ADC shall provide at least 15% of their units for families of low or moderate income. As discussed above, 26 is the base units used to calculate the required amount of affordable housing and the applicant proposes to provide 4 onsite moderate income housing units, which equates to 15%, consistent with the River Road ADC requirement.

Environmental Review
As summarized in the cover staff report, a Draft Subsequent Environmental Impact Report (DSEIR) and a Final SEIR was prepared in accordance with the California Environmentally Quality Act (CEQA). These documents analyzed and addressed potential and unavoidable impacts of the proposed senior assisted living facility. Pursuant to CEQA Guidelines section 15126.6, the DSEIR/FSEIR also identified feasible project alternatives and analyzed their environmental impacts compared to the originally proposed project. As directed by the Monterey County Board of Supervisors on October 12, 2021, the project scope was modified and an augmentation to the FSEIR was prepared to update the project objectives and include and analyze "Alternative 3b" – a residential subdivision for up to 30 residential lots. Although the project before the Commission includes 27 residential lots, including four moderate income units, and an open space parcel, Alternative 3b analyzed up to 30 lots to ensure adequate environmental analysis should construction of onsite inclusionary housing units occur (see the *Affordable Housing* discussion in the cover staff report). Together, the Augmentation and the FSEIR concluded that Alternative 3b would result in less environmental impacts than the senior living facility project and would meet most of the objectives of the proposed project. Indeed, the FSEIR's analysis of the augmentation did not reveal any new environmental impacts or required mitigations. Staff therefore recommends that Alternative 3b be considered the proposed project.

Project Objectives
The objectives of the original project that would be fulfilled by Alternative 3b (as provided by the applicant) are the following:

- To provide housing in a geographic location where it is clearly needed and where adequate public facilities currently exist or can be readily provided.
- To provide housing in and near an established community so that residents in the facility can feel a sense of connection with local residents.
- To address the critical need for housing for residents of the community in need of suitable housing options.

Aesthetics
The applicant proposes that future single-family dwellings built onsite would not be taller than 20 feet high. To ensure the resulting lots would be subject to a 20-foot height restriction, a non-standard condition of approval has been incorporated requiring a rezone of the property to

include the 20-foot height limitation. The eucalyptus trees retained on the western portion of the property under Alternative 3b are within the critical viewshed (see Toro Area Plan Policies T-1.7 and T-3.3). Although eucalyptus trees are not considered protected within Monterey County, the trees aid in shielding the potential development from the viewshed of SR 68, River Road, and Las Palmas #1. Alternative 3b would potentially impact scenic vistas and the visual character of the site and would introduce new sources of light and glare to the project site and vicinity. However, implementation of identified Mitigation Measures AES-1, AES-2, AES-3, and AES-4, as well as the non-standard condition for the 20-foot height limit, potential aesthetic and viewshed impacts (from State Route 68 and other nearby public viewing areas) would be reduced to less-than-significant.

Biological Resources
The proposed subdivision encompasses approximately 160,000 square feet; with a maximum building site coverage of 35%, less than 60,000 square feet of the subdivision would be covered. To ensure avoidance of potential impacts to special status species, biological mitigation measures, including MM BIO-1 – MM BIO-6, have been incorporated to ensure pre-construction surveys for multiple special status species are conducted prior to construction.

Traffic
The updated traffic report determined that the proposed project would result in an unavoidable significant impact to SR 68 as the roadway currently operates at a Level of Service "F". Adding a single trip to this highway would continue an unavoidable impact. Implementation of traffic mitigation measures (MM TRA-1 and MM TRA-2) included in the FSEIR prepared for the senior living facility would reduce overall traffic trips and during peak traffic hours resulting from employee travel to and from the facility. These mitigations require implementation of a shuttle service plan and a specific employee schedule to ensure shift changes are not during peak traffic hours. Alternative 3b would not be an employee intensive use and these mitigations would not be applicable in this case. Therefore, they have been removed from the proposed conditions of approval.

Exhibit B

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Draft Resolution

Before the Planning Commission in and for the County of Monterey, State of California

RIVER VIEW AT LAS PALMAS LLC (PLN150372)
RESOLUTION NO. ---

Resolution of the Monterey County Planning Commission recommending that the Board of Supervisors:

1. Adopt a resolution to certify the Final Subsequent Environmental Impact Report (FSEIR) as augmented in September 2023 for the River View Project (SCH#2017031025);
2. Adopt a resolution to amend the text of the Las Palmas Ranch Specific Plan to:
    a. Increase the residential unit cap from 1,031 to 1,058; and
    b. Add a new Policy 12 in Chapter II, Section C, specifying that Parcel Q shall require 25% of new housing units as affordable, 15% of which shall be on-site and available to moderate-income households and the remaining 10% of which shall be provided through payment of an in-lieu fee; and
3. Adopt a resolution to approve a Combined Development Permit, consisting of:
    a. a Vesting Tentative Map to create 27 residential lots, including four moderate income units, and an open space parcel;
    b. a Use Permit to allow development on slopes in excess of 25% for subdivision improvements; and
    c. Adopt a Mitigation Monitoring and Reporting Plan.

[River View at Las Palmas LLC, Toro Area Plan, (Assessor's Parcel Number: 139-211-035-000)]

RECITALS

WHEREAS, Section 65300 et seq. of the California Government Code requires each county to adopt a comprehensive, long-term general plan for the physical development of each county.

WHEREAS, Section 65450 of the California Government Code allows counties to prepare a specific plan for the systematic implementation of the general plan for all or part of the area covered by the general plan.

WHEREAS, on September 20, 1983, the Board of Supervisors adopted the Las Palmas Ranch Specific Plan ("LPR SP").

WHEREAS, Sections 65350 et seq. and 65453 of the California Government Code provide the procedure for amendments to adopted general plans and specific plans, respectively.

WHEREAS, on October 26, 2010, the Board of Supervisors of the County of Monterey ("County") adopted the 2010 Monterey County General Plan for the non-coastal area of the County, including the Toro Area Plan within Chapter 9-I of the 2010 General Plan.

WHEREAS, pursuant to Article XI, section 7 of the California Constitution, the County of Monterey may adopt and enforce ordinances and regulations not in conflict with general laws to protect and promote the public health, safety, and welfare of its citizens.

WHEREAS, on March 13, 2024, the Monterey County Planning Commission held a duly noticed public hearing to consider a recommendation to the Board of Supervisors on the following:

1. A resolution with necessary findings and evidence certifying the Final Subsequent Environmental Impact Report, as augmented September 2023, for the River View at Las Palmas project (**Attachment 1**);
2. A resolution (**Attachment 2**) amending the Las Palmas Ranch Specific Plan; and
3. A resolution (**Attachment 3**) approving a Vesting Tentative Map for 27 residential lots and an open space parcel, a Use Permit to allow development on slopes in excess of 25%, and adoption of a Mitigation Monitoring and Reporting Plan.

At least 10 days before the public hearing before the Planning Commission, notices of the hearing were published in the Monterey County Weekly, provided to all those who requested notice, and were also posted on and near the project site.

WHEREAS, the Planning Commissions, as a recommending body to the Board of Supervisors, has considered the information and affirms the conclusions contained in: the Draft Subsequent Environmental Impact Report (DSEIR), prepared subsequent to the Las Palmas Ranch Specific Plan and Final EIR, adopted September 20, 1983, was circulated for public review from March 12, 2018 through April 25, 2018 (SCH # 2017031025), and the Final SEIR as augmented September 2023.

WHEREAS, the Planning Commission has reviewed a draft Resolution of the Monterey County Board of Supervisors for an amendment to the Las Palmas Ranch Specific Plan (LPR SP), and recommends the Board of Supervisors approve the project in substantial conformance with the attached Resolution (**Attachment 2**).

WHEREAS, the Planning Commission has reviewed a draft Resolution of the Monterey County Board of Supervisors for approval of the Project, subject to approval of the proposed LPR SP amendments, and recommends the Board of Supervisors approve the project in substantial conformance with the attached Resolution (**Attachment 3**).

WHEREAS, approval of the Vesting Tentative Map and Use Permit for the Project will not become effective until/unless the Las Palmas Ranch Specific Plan (LPR SP) amendments are approved/adopted by the Monterey County Board of Supervisors.

DECISION

NOW, THEREFORE, be it resolved, based on the above recitals, the written and documentary evidence, the staff reports, oral testimony, and the administrative record as a whole, that the Planning Commission does hereby Recommend that the Board of Supervisors:

1. Adopt a resolution to Certify the Final Subsequent Environmental Impact Report (FSEIR) as augmented in September 2023 for the River View Project (SCH#2017031025);
2. Adopt a resolution to amend the text of the Las Palmas Ranch Specific Plan to:
    a. Increase the residential unit cap from 1,031 to 1,058; and
    b. Add a new Policy 12 in Chapter II, Section C, specifying that Parcel Q shall require 25% of new housing units as affordable, 15% of which shall be on-site and available to moderate-income households and the remaining 10% of which shall be provided through payment of an in-lieu fee; and
3. Adopt a resolution to approve a Combined Development Permit, consisting of:
    a. Vesting Tentative Map to create 27 residential lots, including four moderate income units, and an open space parcel;
    b. Use Permit to allow development on slopes in excess of 25% for subdivision improvements; and
    c. Adopt a Mitigation Monitoring and Reporting Plan.

All in substantial conformance with the attached documents (**Attachments 1, 2, and 3**).

PASSED AND ADOPTED this 13th day of March, 2024, upon motion of Commissioner _____, seconded by Commissioner_____, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
Melanie Beretti, AICP
Planning Commission Secretary

COPY OF THIS DECISION MAILED TO APPLICANT ON_____.

This decision, if this is the final administrative decision, is subject to judicial review pursuant to California Code of Civil Procedure Sections 1094.5 and 1094.6. Any Petition for Writ of Mandate must be filed with the Court no later than the 90th day following the date on which this decision becomes final.

EXHIBIT B1

DRAFT FINAL SEIR AUGMENTATION CEQA RESOLUTION

Before the Board of Supervisors
in and for the County of Monterey, State of California

In the matter of the application of: **RIVER VIEW AT LAS PALMAS LLC (PLN150372)**
RESOLUTION NO. 24 - XX
Resolution by the Monterey County Board of Supervisors:

1. Certify the River View Final Subsequent Environmental Impact Report (FSEIR) as augmented in September 2023; and
2. Adopt the following findings and Statement of Overriding Considerations.

[River View at Las Palmas Assisted Living Senior Facility, Toro Area Plan, (Assessor's Parcel Number: 139-211-035-000)]

The RIVER VIEW AT LAS PALMAS LLC application (PLN150372) came on for a public hearing before the Monterey County Board of Supervisors on [DATE]. Having considered all the written and documentary evidence, the administrative record, the staff report, oral testimony, and other evidence presented, the Monterey County Board of Supervisors finds and decides as follows:

FINDINGS

1. FINDING: **CALIFORNIA ENVIRONMENTAL QUALITY ACT (EIR) -** The County of Monterey has completed the Final Subsequent Environmental Impact Report (FSEIR) examining the River View at Las Palmas Assisted Living Senior Facility Project in compliance with the California Environmental Quality Act (CEQA) guidelines. On March 14, 2024, staff presented the FSEIR, as augmented in September 2023, to the Planning Commission for consideration and recommendation to the County of Monterey Board of Supervisors. The Board of Supervisors reviewed and considered the information contained in the Draft SEIR prior to approval of the project. The FSEIR reflects the County of Monterey's independent judgment and analysis.

EVIDENCE: a) The project (Project) aligns with Alternative 3 – No Project/Existing Zoning (40-Lot Subdivision) analyzed in the SEIR (see Finding 4 and supporting evidence). The Project consists of the subdivision of one 15.64-acre parcel into 27 residential lots, including four moderate income units, and an open space parcel as well as

development on slopes in excess of 25% to allow subdivision improvements including the installation of roadways and utilities.

b) In 2015, the County of Monterey received an application to allow a 190,00 square foot senior assisted living facility inclusive of 13 "Casitas", a 27,000 square foot Assisted Living Facility, a 21,600 square foot Memory Care Facility and associated site development, including internal roadways and parking areas. CEQA requires preparation of an environmental impact report (EIR) if there is substantial evidence in light of the whole record that the project may have a significant effect on the environment. Due to the size and complexity of the proposed project, it was decided during the preliminary review that an EIR should be prepared to address potential impacts without the preparation of an Initial Study.

c) A Draft Subsequent Environmental Impact Report (DSEIR) was prepared and circulated for public review from March 12, 2018 through April 25, 2018 (SCH # 2017031025). The DSEIR was prepared subsequent to the Las Palmas Ranch Specific Plan and Final EIR, adopted September 20, 1983 (see Appendix A to the Draft SEIR found as Exhibit E of the March 13, 2023 Planning Commission staff report).

d) Issues that were analyzed in the DSEIR include Aesthetics, Agricultural and Forest Resources, Air Quality, Biological Resources, Greenhouse Gas Emissions, Cultural Resources, Geology and Soils, Hazardous Materials, Surface Hydrology, Mineral Resources, Noise, Public Services, Recreation, Solid Waste, Transportation, Energy, Wastewater, and Water Supply. The DSEIR identified potential significant impacts that are either less than significant or can be mitigated to less than significant levels on Aesthetics (impact to scenic vistas and introduction of light and glare), Air Quality (air pollutant emissions), Biological Resources (special status animal species and nesting birds), and Transportation (impact to intersections and State Route 68). See also Finding Nos. 2 and 3 and supporting evidence. The EIR also identified unavoidable significant Project impacts to Transportation (project level and cumulative level impacts to State Route 68) that cannot be mitigated to less than significant levels (see also Finding No. 4 and supporting evidence). As described in these findings and in the FSEIR, the mitigation measures avoid or substantially lessen the significant environmental effects to less than significant levels, or, for impacts identified as significant and unavoidable, all feasible mitigation measures have been incorporated, but even with such mitigation, the impacts remain significant.

e) <u>Public Review of the DSEIR.</u> Public review of the DSEIR generated comments from the public and public agencies. The County of Monterey received 118 letters, including public agency comments from the Monterey Bay Air Resources District and the Monterey County Water Resources Agency; 9 comment letters were from

various organizations and businesses and the remaining were from members of the public. Comment letters generally addressed the following topics: Safety and Security; Fire Safety; Land Use Incompatibility, Property Value, and Quality of Life; Transportation/Traffic; Slope Stability and Stormwater Drainage; Visual Impacts; Wildlife Impacts; Noise; and Private Land Rights. The County responded to these comments and made revisions to the DSEIR. The County of Monterey prepared a FSEIR dated September 2019, including responses to all comments received on the DSEIR during the public review period, as well as amendments to the DSEIR made in response to these comments. On September 26, 2019, pursuant to CEQA Guidelines section 15088(b), the County notified those public agencies that submitted comments on the DSEIR that a FSEIR was available for review and provided its proposed responses to the public agency comments. The FSEIR was released to the public on September 27, 2019. Together, the DSEIR, the revisions to the DSEIR, the comments of persons and organizations commenting on the DSEIR, a list of all such persons and organizations, and the September 27, 2019 FSEIR containing responses to the comments, as well as the September 2023 augmentation to the FSEIR, constitute the Project's FSEIR .

f) No Previous Action on the FSEIR. On February 12, 2020, the Planning Commission adopted Resolution Nos. 20-004, 20-005, and 20-006, recommending the Board of Supervisors certify the FSEIR, amend the Las Palmas Specific Plan and approve the project for a senior living facility. On October 12, 2021, the Board voted to return the matter to staff for further analysis of the original project with an expanded look into the EIR, community benefit analysis, and housing. The Board took no action on the FSEIR.

g) Modified Project Scope. On September 2, 2022, the applicant modified the project scope, to provide additional residential housing units.

h) Augmentation to FSEIR. In September 2023, the County of Monterey augmented the FSEIR to update the Project Objectives to provide: a range of housing and/or care options for persons who do not require 24-hour skilled nursing care; housing in/near an established community; and to address the need for housing. The augmentation also updated the alternatives, identifying "Alternative 3a" as the "No Project/Existing Zoning" (previously identified as Alternative 3, up to 40-lot residential subdivision) and introducing a new "Alternative 3b" for a Reduced No Project/Existing Zoning. Alternative 3b would include a subdivision of the project site of no more than 30 residential lots and an open space parcel. This is a conservative analysis of full residential buildout if all the required affordable housing units were provided onsite.

i) Project (Alternative 3b) Impacts. Issues that were analyzed in the FSEIR, as augmented in September 2023, include Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Transportation/Traffic and Water Supply. As demonstrated in Finding 2 and supporting evidence, potential Project impacts to Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions and Water Supply would be reduced to a less than significant level. As demonstrated in Finding 3 and supporting evidence, potential Project impacts to Transportation/Traffic would remain significant and unavoidable.

j) Tribal Consultation. Pursuant to CEQA Guidelines section 15082 of the, the County filed the SEIR Notice of Preparation (NoP) on March 7, 2017. At that time, the County had not received a request for consultation from a Native American tribe. Therefore, no consultation was conducted relative to Tribal Cultural Resources. Additionally, the project site is in an area of low archaeological sensitivity.

k) Evidence that has been received and considered includes the application, technical studies/reports, staff report that reflects the County's independent judgment, and information and testimony presented during public meetings and hearings (as applicable). These documents are on file in HCD-Planning (File No. PLN150372) and are hereby incorporated herein by reference.

l) No new mitigation measures are recommended following the change in the scope of work. However, 2 mitigation measures that were applied to the original proposal of the senior assisted living facility have been deleted since they do not apply to residential subdivisions. Conditions Nos. 33 and 34 relate directly to employee transportation and managing traffic to avoid trips during peak traffic hours. Traffic trips cannot be managed for a residential subdivision; therefore, these two conditions have been removed from the proposed recommendation.

m) County of Monterey HCD-Planning, located at 1441 Schilling Place South, 2nd Floor, Salinas, California, 93901, is the custodian of documents and other materials that constitute the record of proceedings upon which the decision to certify the FSEIR, as augmented in September 2023, is based.

2. FINDING: **EFFECTS WITH NO IMPACT OR LESS THAN SIGNIFICANT IMPACT** – The FSEIR found that Project will have no impact or less than significant impacts on the areas listed below and fully detailed in the FSEIR.

EVIDENCE: a) The Project would have no impact on the following categories, fully detailed in the FSEIR: Agricultural/Forest Resources, Hazardous Materials, Mineral Resources, Public Services, Parks and Recreation, and Solid Waste, and Cultural Resources.

b) Cultural Resources. As fully detailed in the FSEIR, the Project would have a less than significant impact on Cultural Resources. Monterey County GIS indicates that the project site has a low archaeological sensitivity. Additionally, the subdivision's 1983 EIR concluded that no archaeological resources are known or suspected to exist on the project site.

c) Geology and Soils. As fully detailed in the FSEIR, the Project would have a less than significant impact on to Geology and Soils. The Geological Hazards Report and Soil engineering Feasibility Investigation prepared for the project indicates that the 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. Further, the proposed subdivision is located within the geologically stable building envelope shown on Sheet 1 of the report.

d) Greenhous Gas Emissions. The proposed project would result in a total of 617 metric tons per year (MT/year) of CO_2e (carbon dioxide equivalent) during construction and 1,005 MT/year of CO2e during operation, while Alternative 3b would generate approximately 560 MT/year of CO_2e during construction and 569 MT/year of CO2e during operation. Both the proposed project and Alternative 3b's GHG emissions would be less than significant. No mitigation measures are required.

e) Surface Hydrology. As fully detailed in the FSEIR, the Project would have a less than significant impact on Surface Hydrology. The Project is required to comply with the National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Storm Water Associated with Construction Activities and through implementation of Best Management Practices (BMPs), construction would not impact surface and groundwater water quality from storm water runoff. The Project will introduce new impervious surfaces on an undeveloped site. A preliminary storm water control plan for the Project was found to conform with storm drainage facility design standards and NPDES requirements would be implemented ensuring that there will be no impacts related to localized flooding. The Project has been conditioned accordingly.

f) Noise. As fully detailed in the FSEIR, the Project will have a less than significant impact on Noise levels. The Project is not expected to produce significant temporary or continuous noise from on-site operations (single family dwellings) that would significantly increase exiting ambient noise levels and construction activities are subject to County of Monterey noise standards.

g) Wastewater. As fully detailed in the FSEIR, the Project will have a less than significant impact on Wastewater. The Las Palmas Ranch

Specific Plan area is served by Las Palmas Wastewater Treatment Plants 1 and 2, which are operated by California American Water Company. California American Water Company provided a "can and will serve" letter for the project and in 2017, there was service capacity to treat up to 72,602 gallons per day. As demonstrated in the augmented FSEIR, the 30-lot residential subdivision is expected to have a water demand of 5 acre feet per year, or 4,464 gallons per day. Therefore, Project wastewater service is within of California American Water Company's capacity.

h) Water Supply. The proposed project will have an estimated water demand of 11.376 AFY. The maximum 30 residences that may be constructed under Alternative 3b are expected to have a water demand of approximately 5.0 AFY (Monterey Peninsula Water Management District 2022), which is less than the water demand of the originally proposed project. Therefore, Alternative 3b will result in a less-than-significant impact to water supply, and impacts will be lesser than the originally proposed project.

i) The River View at Las Palmas Assisted Living Senior Facility Project Draft SEIR dated January 29, 2018, FSEIR dated September 2019 and the augmentation to the FSEIR dated September 2023.

j) The application, project plans, and related support materials submitted by the project applicant to County of Monterey HCD-Planning for the proposed development found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] approving the River View Combined Development Permit.

3. FINDING: **EFFECTS THAT ARE REDUCED TO A LEVEL OF "LESS THAN SIGNIFICANT" BY THE MITIGATION MEASURES IDENTIFIED IN THE SEIR AND MADE CONDITIONS OF APPROVAL OF THE PROJECT –** Alternative 3b will result in significant and potentially significant impacts that will be mitigated to a less than significant level due to incorporation of mitigation measures from the SEIR into the conditions of project approval. Changes or alterations have been required in, or incorporated into, the Alternative 3b that mitigate or avoid the significant effects on the environment as identified in the FSEIR as augmented in September 2023.

EVIDENCE: a) The SEIR identified potentially significant impacts to Aesthetics, Air Quality, Biological Resources, and Energy that require mitigation as to all components of the project. Alternative 3b will have reduced impacts compared to the originally proposed senior assisted living facility; however, unavoidable impacts will still be mitigated to a less than significant level with incorporation of mitigation measures from the FSEIR into the conditions of project approval. The Board

of Supervisors considered project approval subject to such conditions of approval.

b) Aesthetics. Alternative 3b will impact scenic vistas and the visual character of the site and introduce new sources of light and glare to the project site and vicinity. Impacts to scenic vistas and the introduction of new sources of light and glare will be potentially significant but will be reduced to less-than-significant levels with the application of Mitigation Measures AES-1, AES-2, AES-3, and AES-4. Development facilitated by Alternative 3b will be less than the originally proposed project. The total area of the residential subdivision under this alternative will be approximately 160,000 square feet, 30,000 square feet less than the originally proposed project. Additionally, the scale and massing of up to 30 single-family residences (up to 20 feet in height) will be substantially reduced compared to the assisted care living facility, memory care living facility (up to 30 feet in height, located within a critical viewshed of the Toro Area Plan), and 13 Casitas residential buildings included in the originally proposed project. Alternative 3b will introduce less light and glare to the project site compared to the originally proposed project, and the removal of 10 fewer on-site trees (70 trees under Alternative 3b as compared to 80 trees under the proposed Project) will result in more similar views of the site from the viewshed of State Route (SR) 68, River Road, and Las Palmas #1 as under existing conditions. Additionally, on-site development under Alternative 3b will be similar to surrounding residential development. The single-family residences will be more visually consistent with the existing residences in the project vicinity and will not conflict with the Las Palmas Ranch Specific Plan Design Guidelines. Impacts to aesthetics under Alternative 3b will be reduced compared to the originally proposed senior assisted living facility, as development will be substantially reduced in scale. Mitigation Measures AES-1, AES-2, AES-3, and AES-4 apply to Alternative 3b to reduce impacts associated with views from SR 68, exterior lighting, and visual consistency with the existing landscape.

c) Air Quality. Although reduced from the originally proposed project, Alternative 3b will have air quality-related impacts from emissions during construction. These impacts would be potentially significant but will be reduced to less-than-significant levels with the application of Mitigation Measures AQ-1 (Dust Control Measures), AQ-2 (Dust Control Site Monitor), and AQ-3 (Reduction of Construction Exhaust Emissions).

d) Biological Resources. The proposed project will impact biological resources, including potential loss or disturbance of American badgers, potential loss or disturbance of burrowing owls, potential loss or disturbance of Monterey dusky-footed woodrats, potential loss or disturbance of special-status bats, and potential loss or

disturbance of nesting birds. All potential impacts will be reduced to less-than-significant levels with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-6. These mitigation measures will ensure pre-construction surveys are completed prior to the start of construction. These surveys will help avoid impacts to the previously mentioned special status species. With the implementation of the BIO mitigation measures, the Project will also have a less-than-significant impact on impeding the movement of common wildlife. These mitigations have been incorporated into the Project as conditions of approval since the Alternative 3b still includes ground disturbance.

e) Energy. Although the FSEIR determined that the Project would represent an extremely small fraction of the county's long-term energy consumption, mitigation measure ENG-1 was applied to ensure consistency with Las Palmas Ranch Specific Policies G-1 through 2. Therefore, this mitigation has been incorporated into the Project as a condition of approval.

f) Traffic. Based on International Transportation Engineers (ITE) trip generation rates for each category, the originally proposed senior assisted living facility inclusive of an assisted living center and a memory care center (100 beds) and detached assisted living units (26 units; 42 beds) would have generated approximately 362 daily trips (26) for assisted living and memory care center and 96 for senior adult housing units). As revised, the Project will result in less-than significant impacts to area intersections and roadways segments of River Road. A Traffic Impact Analysis was prepared for Alternative 3b by Keith Higgins, Traffic Engineer, in December 2022. The Traffic Impact Analysis was revised with a memo in March 2022 to estimate traffic impacts associated with up to 30 residences. Alternative 3b is expected to generate trips at a similar rate to existing residences near the project site. Up to 30 lots facilitated by Alternative 3b are expected to generate approximately 264 daily trips, with 20 AM peak hour trips and 26 PM peak hour trips. This is a reduction of 98 trips per day, or 27 percent fewer trips compared to the originally proposed project. The addition of these trips to area roadways is expected to result in imperceptible increases in delay on area roadways, and no change in level of service from existing conditions. Alternative 3b will have a less significant impact on traffic to area intersections and roadways segments of River Road, as opposed to the originally proposed senior assisted living facility. As previously mentioned in Finding 1, Evidence "l", two mitigation measures were applied to the original proposal for the senior assisted living facility; however, those do not apply to the proposed residential subdivision.

g) The River View at Las Palmas Assisted Living Senior Facility

Project Draft SEIR dated January 29, 2018, Final SEIR dated September 2019 and as augmented in September 2023, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] approving the River View Combined Development Permit.

4. FINDING: **EFFECTS POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACTS –** The Project will result in significant and unavoidable impacts that will not be mitigated to a less than significant level even with the incorporation of mitigation measures from the SEIR into the conditions of project approval, as further described in the evidence below. Specific economic, legal, social, technological, and other considerations make additional mitigation infeasible.

EVIDENCE: a) Traffic – Project Level Impact. Section 17.0 of the augmented FSEIR discusses significant and unavoidable impacts to Transportation that could result from the originally proposed project and Alternative 3b that would not be mitigated to a less than significant level, even with incorporation of mitigation measures from the SEIR into the conditions of project approval. As explained in Finding 3, Evidence "f", Alternative 3b will reduce traffic by 98 trips per day, or 27 percent fewer trips compared to the originally proposed project. However, the Project will still result in a significant and unavoidable impact by adding additional traffic to SR 68. Therefore, as SR 68 continues to operate at LOS F during peak hours, Alternative 3b will also result in significant and unavoidable impacts to the level of service of SR 68.

b) Traffic – Cumulative Level Impact. The DSEIR explained that SR 68 is projected to operate at LOS F and under cumulative plus project conditions, the DSEIR concluded that the originally proposed project would contribute to incremental increases in cumulative traffic volumes on SR 68 and would, therefore, contribute to a significant cumulative impact. Although there are no mitigation measures available to reduce cumulative impacts to a less than significant level, the owner/applicant is still required to pay regional traffic impact fees to partially mitigate its impacts by funding SR 68 improvements. Payment of regional traffic fees has been incorporated into the project as a condition of approval.

c) The River View at Las Palmas Assisted Living Senior Facility Project Draft SEIR dated January 29, 2018, FSEIR dated September 2019 and as augmented in September 2023, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] approving the River View Combined Development Permit.

5. FINDING: **ALTERNATIVES TO THE PROPOSED PROJECT** - The Augmentation to the FSEIR evaluated a reasonable range of potentially feasible alternatives to the proposed project in compliance with CEQA Guidelines section 15126.6. The Augmentation to the FSEIR considered the alternatives described below and as more fully described in the Draft SEIR. Specific economic, legal, social, technological, or other considerations make infeasible the project alternatives identified in the Augmentation to the FSEIR for the reasons described below.

EVIDENCE: a) Per CEQA Guidelines section 15126.6, an EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. It also requires an evaluation of the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. Section 17.0 of the augmented FSEIR described and analyzed a reasonable range of alternatives, including a no project alternative, and evaluated their comparative merits. The discussion of each alternative presented sufficient information to allow meaningful evaluation, analysis, and comparison with the proposed project. Per CEQA Guidelines section 15126.6(e), the alternatives discussion also identified an environmentally superior alternative. Table 17-1 of the DSEIR summarizes the potential impacts of the various project alternatives. See also Evidence "b" through "l" below.

b) CEQA Guidelines section 15126.6(a) requires a description of reasonable alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. It also requires an evaluation of the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. CEQA Guidelines section 15126.6(b) further requires that the discussion of alternatives focus on those alternatives capable of eliminating any significant adverse environmental impacts or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. CEQA Guidelines section 15126.6(e) stipulates that a "no project" alternative be evaluated along with its impacts. CEQA Guidelines section 15126.6(d) requires the EIR to present enough information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an

alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. CEQA Guidelines section 15126.6(e) requires the identification of an environmentally superior alternative. If the "No Project" alternative is the environmentally superior alternative, then the environmentally superior alternative amongst the remaining alternatives must be identified.

c) Alternative 1 – No Project/No Development. The "no project/no development" alternative assumes no development would occur on the project site. The project site would continue to be vacant land, partially used for grazing. Under this alternative, there would be no potential adverse impacts to aesthetics, air quality, biological resources, energy, or transportation. However, it would leave the property open to future project which would most likely have similar, if not the same, environmental impacts as the senior assisted living facility. Additionally, the No Project/No Development Alternative would not meet any of the project objectives; therefore, the No Project/No Development alternative is infeasible.

d) Alternative 2 – No Project/Minimum Use. The " No Project/Minimum Use" alternative assumes the proposed project would not be constructed or operated on the project site. Instead, this alternative considers the construction of the minimum allowable use on the subject property, which would be one single family dwelling and any accessory structures considered incidental to residential use, such as barns and storage buildings. The No Project/Minimum Use alternative would not necessarily reduce significant project impacts because this alternative would also leave open the opportunity for future development of the project site as described in the alternative, thereby still resulting in potential impacts to aesthetics, air quality, biological resources, energy, as well as significant unavoidable impacts to transportation. Although the potential impacts would be reduced, they would not be eliminated under this alternative. This alternative would not address the project objective of addressing the critical need for housing for residents of the community in need of suitable housing options. The subject parcel is zoned for Medium Density Residential, 2.61 units per acres, by building only on single family dwelling on the property zoned for approximately 40 lots, it would not fully utilize the potential for the parcel. It would also not be economically viable for the applicant. Therefore, the No Project/Minimum Use alternative is not favorable because it does not fully meet the project objectives.

e) Alternative 3a – No Project/Existing Zoning (40-Lot Subdivision). The "No Project/Minimum Use" alternative assumes the proposed project would not be constructed or operated on the project site. As

opposed to Alternative 2, Alternative 3a would fully utilize the site as it is zoned Medium Density Residential. This alternative would utilize the property to its full extent with an allowed residential use; however, it would have similar significant impacts as the originally proposed senior assisted living facility. It would also require significantly more development on slopes in excess of 25% to provide 40 residential units that are a minimum of 6,000 square feet in area. Additionally, impacts to Air Quality, Water Supply, Visual Resources and Biological Resources would all be impacted due to the size of the project. Although this alternative would address the project objectives and be economically viable for the applicant, it would not significantly reduce environmental impacts from the originally proposed senior assisted living facility.

f) Alternative 3b – Reduced No Project/Existing Zoning (Up to a 30-Lot Subdivision). The "Up to 30-Lot Subdivision" Alternative is the currently proposed project as it meets the project objectives while reducing the impacts analyzed under the FSEIR for the senior assisted living facility. This alternative would allow utilization of the 15.64-acre lot to its full extent while reducing impacts analyzed for the senior assisted living facility. This option would allow the applicant to subdivide the parcel into 30 residentially zoned parcels and one open space parcel, four of the residential lots would be designated for low income housing units. If the applicants are unable to provide four low income housing units, they would pay an in-lieu fee to the County instead. The augmented FSEIR analyzed the potential impacts to Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Transportation/Traffic and Water Supply and found the impacts of Alternative 3b to be less than those associated with the original proposal. It would, however, still produce a significant and unavoidable impact to traffic on SR 68 (see Finding 4 and supporting evidence), as would all of the proposed project alternatives. This alternative meets most the project objectives including; to provide housing in a geographic location where it is clearly needed and where adequate public facilities currently exist or can be readily provided, to provide housing in and near an established community so that residents in the facility can feel a sense of connection with the local residents, and to address the critical need for housing for residents of the community in need of suitable housing options. This alternative is a feasible and preferred alternative to the original project.

g) Alternative 4 – Reduced Project. The "Reduced Project" alternative includes a reduced development footprint. For conceptual purposes, Alternative 4 eliminates the casitas from the originally proposed project. This would result in the loss of 26 living units with 42 beds, representing 30 percent of the total beds of the proposed project, and would result in a proportionate reduction in environmental impacts.

Therefore, under this reduced project scenario, development on the project site would include the assisted living facility and memory care living facility, and other associated site improvements. Although the Reduced Project alternative would reduce significant project impacts, it would still result in potential impacts requiring mitigation to aesthetics, air quality, biological resources, energy, as well as significant unavoidable impacts to transportation. The Reduced Project alternative is not proposed due to the recommendations and requests of the existing residences in Las Palmas #1. Additionally, Alternative 4 would have more impacts to visual resources and aesthetics as the assisted living center and memory care center would be subject to a 30 foot height limit, opposed to the residential homes of Alternative 3b which would be subject to a 20 foot height limit. Additionally, the commercial operation would require onsite employees, this would have greater impacts on traffic than any residential alternative. Although this may be a feasible alternative, it is not the best option when analyzing all the potential impacts from the original project and each alternative.

h) Alternatives Considered but Rejected. An alternative site was considered but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, natural setting while also being located in an established neighborhood. The proposed location also offers amenities within a 5 mile radius including hospitals and doctors on Romie Lane in west south Salinas, shopping, and regional roadway access.
Having an alternative access to the project site was also considered as an alternative, but rejected from further consideration. Alternative access either directly from River Road or as a new internal subdivision roadway would not decrease impacts of the proposed project and may result in increased impacts as compared to the proposed project, such as increased traffic, visual, biological, and impacts to recreational areas associated with entry from River Road.

i) Environmentally Superior Alternative. The No Project/No Development Alternative (Alternative 1) would result in no potential adverse environmental impacts, but would not meet any of the proposed project objectives and would leave the parcel open to future development which would most likely have similar impacts as the originally proposed project. The No Project/Minimum Development Alternative (Alternative 2) would result in less environmental impacts than the proposed project but would not meet any of the proposed project's objectives and would not be financially viable for the applicants. The No Project/Existing Zoning (40-unit subdivision) alternative (Alternative 3a) would result in a similar level of impacts as the proposed project; however, it would meet the

project objectives of providing housing to meet the needs of the area. The Reduced No Project/Existing Zoning (30-unit subdivision) alternative (Alternative 3b) would result in less environmental impacts than the proposed project and would meet most of the objectives of the proposed project. The Reduced Project (Alternative 4) would have an overall reduction in intensity of potential impacts based on the overall reduction in development on the project site, but would still have increased impacts to visual resources and the viewshed from SR 68, as well as traffic impacts, compared to Alternative 3b. Therefore, the environmentally superior alternative that would meet most of the objectives of the proposed project would be the reduced no project/existing zoning (30-unit subdivision) alternative (Alternative 3b).

j) The River View at Las Palmas Assisted Living Senior Facility Project Draft SEIR dated January 29, 2018, FSEIR dated September 2019 and as augmented in September 2023, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] approving the River View Combined Development Permit.

6. FINDING: **CEQA (Statement of Overriding Considerations) –** On the basis of the whole record before the Monterey County Board of Supervisors, the Board has balanced, as applicable, the economic, legal, social, technological, or other benefits of the Project against its unavoidable, significant impacts and adopts a Statement of Overriding Considerations finding that the economic, legal, social, technological, or other benefits of the Project outweigh its unavoidable, adverse environmental effects.

EVIDENCE: a) As reflected in the DSEIR and FSEIR, as augmented in September 2023, the Project would have potentially significant and unavoidable impacts, at project specific and at a cumulative level, related to traffic conditions on SR 68.

b) The Project will result in development that will provide benefits described herein to the surrounding community and the County as a whole.

c) The project would provide the following benefits to the public:

- On October 12, 2021, the Board of Supervisors considered the previous project scope for a senior assisted living facility. It was the Boards decision to return the matter back to staff for further analysis of modified project scope that provides a greater public benefit through establishing more housing.
- Provide housing in an area of limited new home construction that needs residential units due to a housing shortage. Housing production in Monterey County has not kept up with its needs. According to the County's 2022 Annual Progress Report (APR), 2,034 building permits for housing units were

issued in the County during the 5th Cycle Housing Element. Of this total, 226 were very low-income, 249 were low-income, 35 were moderate income, and 1,526 were above moderate-income, representing 60%, 101%, 12%, and 234% of the County's 5th Cycle Regional Housing Needs Allocation (RHNA). The project will provide four moderate-income units onsite, which is the income level with the lowest percentage of housing provided.

- Four onsite moderate income housing units and payment of an in-lieu fee of $401,525 to support other affordable housing projects in the County. This would provide $1,081,925 to subsidize affordable housing both onsite and in the County. In Monterey County, median home prices for ownership residences increased 93% and median rent has increased by 65% between 2014 and 2022 (according to Zillow home price data), while median household income (reported by the U.S. Census Bureau) only increased 31% during the same period. According to the Comprehensive Housing Affordability Strategy (CHAS) 2015-2019 American Community Survey (ACS) data provided by AMBAG August 2022, 15% of households in the Unincorporated County spend 50% or more of their income on rent.
- Affordable by design housing units. The average lot size of the residential parcels is 5,729 square feet and the maximum site coverage in the Medium Density Residential Zoning district is 35%. Except for the 1,500 square foot moderate income-housing units, the average size home, inclusive of an attached garage, would be just over 2,000 square feet due to the 20 foot height limit. Using a construction cost of $275/per square foot and 20% land cost, the average lot would be affordable by design (approximately $660,000).
- By subdividing and developing the lots with single family dwellings, the property value of the River View property would go up and the County would benefit from the associated increased property tax.
- The increase of residents due to the increased housing units would contribute to an increase of local spending.
- The Project is consistent with the existing neighborhood character of the Las Palmas subdivisions and received support from multiple residents of the area. During the October 23, 2023 Toro Land Use Advisory Committee meeting, members of the public expressed that they were either in favor of the Project, as opposed to their objection to the senior care facility. Staff receive a letter from Christine Kemp, dated April 27, 2022, on behalf of the Las Palmas Ranch Master Association No. 1 stating that the association

finds that the Project is a preferred alternative to the senior living facility.

- The Project will create economic benefits to the County and the economy through the creation of jobs for construction (temporary).
- The Project will permanently preserve over 10 acres of land as conservation-oriented open space on the project site. This area will be reserved for native landscaping and will not be available for development other than a small park to satisfy the Quimby Act requirement.
- As required by Mitigation Measure CTRA-1, the applicants will pay applicable Transportation Agency for Monterey County (TAMC) and County of Monterey traffic impact fees. These fees will go towards road maintenance and repair to help compensate for the added traffic to Highway 68. As required by 2010 General Plan Policy C-1.8, the project has also been conditioned requiring the applicant pay a County-wide traffic fee. These fees will address impacts on the County's circulation system.
- Approval allows development of the last undeveloped portion of Las Palmas Ranch identified for development in the LPRSP, the 2010 General Plan, 2010 Toro Area Plan. LPR SP Chapter II, Section C, Policy 11 states that a Development Incentive Zone of ten acres shall be provided within the areas designated in the specific plan for medium density residential development. The property is Medium Density Residential, 2.61 units per acre, with a Design Control overlay. The project will result in a density of 1.8 units/acre which is well below the allowance. This reduced density allows the residential lots to be clustered on a plateau resulting in providing approximately 12 acres of rolling hills protected as open space.

d) The River View at Las Palmas Assisted Living Senior Facility Project Draft SEIR dated January 29, 2018, FSEIR dated September 2019 and as augmented in September 2023, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] approving the River View Combined Development Permit.

7. FINDING: **MITIGATION MONITORING PROGRAM** - Per Public Resources Code section 21081.6 and the proposed Condition of Approval and Mitigation Monitoring and Reporting Plan, the County would, as part of the recommended action, adopt a reporting or monitoring plan for the changes made to the project or conditions of project approval in order to mitigate or avoid significant effects on the environment.

EVIDENCE:

a) On November 8, 2023, the Planning Commission recommended that the Board of Supervisors adopt a Mitigation Monitoring and Reporting Plan for the Project. See Resolution No. [XX].

b) The mitigation measures identified in the FSEIR are incorporated as conditions of approval and are included as an attachment to Resolution No. [XX] for the project.

c) All project changes required to avoid significant effects on the environment have been incorporated into the project and/or are made conditions of approval to the extent feasible. A Condition Compliance and Mitigation Monitoring and/or Reporting Plan has been prepared in accordance with Monterey County regulations and is designed to ensure compliance during project implementation. The applicant must enter into an "Agreement to Implement a Mitigation Monitoring and/or Reporting Program" as a condition of project approval of PLN150372.

d) The River View at Las Palmas Assisted Living Senior Facility Project Draft SEIR dated January 29, 2018, FSEIR dated September 2019 and the Augmentation to the FSEIR dated September 2023, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] approving the River View Combined Development Permit.

8. FINDING: **RECIRCULATION NOT REQUIRED –** No significant new information has been added to the augmentation to the Final SEIR that would require recirculation. Per section 15088.5 of the CEQA Guidelines, the County of Monterey is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review but before certification. "Significant new information" requiring recirculation may include, for example, a disclosure showing:

1) A new significant environmental impact resulting from the project or from a new mitigation measure proposed to be implemented;
2) A substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of less than significant;
3) A feasible project alternative or mitigation measure, considerably different from others previously analyzed, that clearly would lessen the significant environmental impacts of the project, but that the project's proponents decline to adopt; or
4) The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

No such significant new information has been added.

a) Per section 15088.5(b) of the CEQA Guidelines, recirculation of the draft EIR is not required where the new information merely clarifies, amplifies, or makes minor modifications to an adequate EIR. The information provided, and SEIR since the public notice of availability of the Draft SEIR, meets those criteria.

b) All the text revisions to the Draft SEIR provide clarification and additional detail. The changes do not result in a new significant impact or substantial increase in the severity of an environmental impact, and therefore recirculation is not required. Additionally, after considering all comments received on the Draft SEIR, the County finds that the changes do not trigger recirculation of the Draft SEIR.

c) In the augmentation to the SEIR, Alternative 3b was added. Additional quantitative modeling does not result in a new significant environmental impact or new mitigation measures [section 15088.5(1)]. The revisions do not constitute a substantial increase in the severity of an environmental impact [section 15088.5(2)]. Although Alternative 3b has been introduced, it is substantially similar to an existing alternative (Alternative 3a).

d) The quantitative modeling outputs and amendments presented in the augmentation to the FSEIR do not constitute "significant new information." The revisions primarily incorporate analysis of a new alternative, with a comparison of the alternative's impacts to those of the proposed project. As such, these revisions do not result in a new significant environmental impact from the project or from a new mitigation measure, as the project analysis and mitigation measures have not changed [CEQA Guidelines section 15088.5(1)]. Similarly, the additional air quality and greenhouse gas modeling conducted in support of the augmentation to the FSEIR provide additional information that is supportive of the conclusions in the original alternatives analysis. The additional quantitative modeling done in the augmentation to the FSEIR, does not result in a new significant environmental impact or new mitigation measures [CEQA Guidelines section 15088.5(1)]. For the same reasons, the revisions do not constitute a substantial increase in the severity of an environmental impact [CEQA Guidelines section 15088.5(2)]. Although a new alternative (Alternative 3b) is introduced, it is substantially similar to an existing alternative (Alternative 3a). In addition, the project's proponent has not declined to adopt an alternative that would clearly lessen the environmental impacts of the proposed project. As such, CEQA Guidelines section 15088.5(3) does not apply. The DSEIR, FSEIR, and augmentation to the FSEIR were neither inadequate nor conclusory in nature, and meaningful public review and comment have not been precluded. As noted previously, the County received 118 comment letters on the Draft SEIR, including 103 from members of the public. These reviewers

had the opportunity to review Section 17.0, Alternatives, of the DSEIR, which included a 40-lot subdivision (Alternative 3, No Project/Existing Zoning [40-Unit subdivision]; referred to as Alternative 3a in this Augmentation to the FSEIR). The new Alternative 3b is substantially similar to Alternative 3a, as it would result in an up to 30-lot subdivision on the same site. Therefore, this new alternative is not so substantially different such that the public is being deprived of a meaningful opportunity to comment by its addition. The addition of Alternative 3a and associated revisions to the alternatives analysis instead clarifies, amplifies, and makes insignificant modifications to the Draft SEIR. (See Finding No. 7 and supporting evidence)

e) See also Finding Nos. 1, 3, and 4, and supporting evidence.

f) The River View at Las Palmas Assisted Living Senior Facility Project Draft SEIR dated January 29, 2018, FSEIR dated September 2019 and the augmentation to the FSEIR dated September 2023, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] approving the River View Combined Development Permit.

9. FINDING: **FISH AND WILDLIFE FEE –** For purposes of the Fish and Game Code, the project will have a significant adverse impact on the fish and wildlife resources upon which the wildlife depends.

EVIDENCE: a) The California Department of Fish and Wildlife (CDFW) reviewed the DSEIR. All land development projects that are subject to environmental review are subject to a State filing fee plus the County recording fee, unless the CDFW determines that the project will have no effect on fish and wildlife resources. The site supports biological and forest resources. For purposes of the Fish and Game Code, the project will have a significant adverse impact on the fish and wildlife resources upon which the wildlife depends. Therefore, the project will be required to pay the State fee in effect at the time of the recordation of the Notice of Determination (NOD) to the County of Monterey Clerk/Recorder for processing said fee and posting the NOD.

b) The River View at Las Palmas Assisted Living Senior Facility Project Draft SEIR dated January 29, 2018, FSEIR dated September 2019 and the augmentation to the FSEIR dated September 2023.

c) The application, project plans, and related support materials submitted by the project applicant to County of Monterey HCD-Planning for the proposed development found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] approving the River View Combined Development Permit.

DECISION

NOW, THEREFORE BE IT RESOLVED, based on the above findings and evidence and the administrative record, that the Board of Supervisors:

1. Certifies the Augmentation to the Final SEIR based on the findings and evidence.
2. Adopts the CEQA Findings for Project approval, and the Statement of Overriding Considerations; and
3. Adopts the Mitigation Monitoring and Reporting Plan.

PASSED AND ADOPTED upon motion of Supervisor _____, seconded by Supervisor _____, and carried this [DATE], by the following vote to wit:

AYES:
NOES:
ABSENT:
ABSTAIN:

I, Valerie Ralph, Clerk of the Board of Supervisors of the County of Monterey, State of California, hereby certify that the foregoing is a true copy of an original order of said Board of Supervisors duly made and entered in the minutes thereof Minute Book _____ for the meeting on [DATE].

Date:
File Number:

Valerie Ralph, Clerk of the Board of Supervisors
County of Monterey, State of California

By_____
Deputy

COPY OF THIS DECISION MAILED TO APPLICANT ON _____.

This decision, if this is the final administrative decision, is subject to judicial review pursuant to California Code of Civil Procedure sections 1094.5 and 1094.6. Any Petition for Writ of Mandate must be filed with the Court no later than the 90th day following the date on which this decision becomes final.

NOTES

1. You will need a building permit and must comply with the Monterey County Building

Ordinance in every respect.

Additionally, the Zoning Ordinance provides that no building permit shall be issued, nor any use conducted, otherwise than in accordance with the conditions and terms of the permit granted or until ten days after the mailing of notice of the granting of the permit by the appropriate authority, or after granting of the permit by the Board of Supervisors in the event of appeal.

Do not start any construction or occupy any building until you have obtained the necessary permits and use clearances from Monterey County HCD- Planning and HCD- Building Services Department office in Salinas.

2. This permit expires 3 years after the above date of granting thereof unless construction or use is started within this period.

Form Rev. 1-27-2021

EXHIBIT B
Attachment 2
DRAFT SPECIFIC PLAN AMENDMENT RESOLUTION

Before the Board of Supervisors
in and for the County of Monterey, State of California

In the matter of the application of:
RIVER VIEW AT LAS PALMAS LLC (PLN150372)
RESOLUTION NO. 23 - XX
Resolution by the Monterey County Board of Supervisors amending the text of the policies of the Las Palmas Ranch Specific Plan.
[River View at Las Palmas Assisted Living Senior Facility, Toro Area Plan, (Assessor's Parcel Number: 139-211-035-000) Referred to herein as 'Parcel Q'.]

An amendment to the Las Palmas Ranch Specific Plan (LPRSP) to amend the text of the policies of the Las Palmas Ranch Specific Plan came on for a public hearing before the Board of Supervisors on [DATE]. Having considered all the written and documentary evidence, the administrative record, the staff report, oral testimony, and other evidence presented, the Monterey County Board of Supervisors make the following amendment with reference to the following facts:

RECITALS

1. Section 65300 et seq. of the California Government Code requires each county to adopt a comprehensive, long-term general plan for the physical development of each county.

2. On October 26, 2010, the Board of Supervisors of the County of Monterey ("County") adopted the 2010 Monterey County General Plan for the non-coastal area of the County, including the Toro Area Plan within Chapter 9-I of the 2010 General Plan.

3. Section 65450 of the California Government Code allows counties to prepare a specific plan for the systematic implementation of the general plan for all or part of the area covered by the general plan.

4. On September 20, 1983, the Board of Supervisors adopted the Las Palmas Ranch Specific Plan.

   Sections 65350 et seq. and 65453 of the California Government Code provide the procedure for amendments to adopted general plans and specific plans, respectively.

5. Policy 5 of Section C (Housing & Residential Land Use) of Chapter II of the Las Palmas Ranch Specific Plan (LPRSP) limits the maximum number of residential units within the Specific Plan area to 1,031 residential units in accordance with Figure D and Figure E of the LPRSP.

6. The proposed amendment would also add language to Policy 5 of Section C (Housing & Residential Land Use) of Chapter II of the Las Palmas Ranch Specific Plan as follows (the added/amended text is underlined to differentiate from existing Policy 5 text):

   The Specific Plan allows a maximum of ~~1,031~~ 1,058 residential units in accordance with Figure D and Figure E. Parcel Q at Las Palmas Ranch is designated for Medium Density Residential use, as illustrated in Figure E, and based on subsequent Policy 11, has an allowed density of 10 units per acre. However, zoning for Parcel Q is Medium Density Residential with a density of 2.61 units per acre. To confirm the allowable use on Parcel Q, the Las Palmas Ranch Specific Plan is hereby amended add:

   Parcel Q of Las Palmas Ranch is amended to allow 27 residential units consistent with the Board of Supervisors Resolution [XX].

7. The proposed amendment would include adding a line of data to Figure D to indicate that Parcel Q is allotted 27 residential lots for development and increase the total amount of residential units from 1,031 to 1,058. Additionally, the subject parcel shown on Figure E would be labeled with a "Q" as it is currently unlabeled.

8. The proposed amendment would include amend Figure H to illustrate that Parcel Q is within the developable area subject to plan policies.

9. In order to achieve vertical consistency with the 2010 General Plan (Land Use Policy LU-2.13) and Monterey County Code Chapter 18.40 - Inclusionary Housing Ordinance of the County of Monterey, the proposed amendment includes new Policy 12 of Section C (Housing & Residential Land Use) of Chapter II of the Las Palmas Ranch Specific Plan to read as follows:

   Development of Parcel Q shall require 25% of new housing units be provided as affordable. At least 15% shall be provided onsite to moderate-income levels. The remaining 10% shall be provided through payment of an in-lieu fee.

10. Pursuant to California Government Code Section 65453, the County may amend an adopted specific plan in the same manner as a general plan, provided the County follows certain procedures, including that the County Planning Commission hold a noticed public hearing and make a written recommendation to the Board of Supervisors on the proposed amendment of the specific plan (California Government Code Section 65353), and that the Board of Supervisors hold a public hearing to determine whether to amend the specific plan (California Government Code Section 65355).

11. Pursuant to the California Environmental Quality Act, the County of Monterey prepared an Augmented Subsequent Environmental Impact Report (SEIR) for the River View at Las Palmas Facility, which includes the proposed amendment to the Las Palmas Ranch Specific Plan. The Monterey County Planning Commission considered and recommended certification of the Augmented Final SEIR concurrent with taking this action on the proposed LPRSP amendment.

12. A public hearing on the River View as Las Palmas Facility project, including an LPRSP amendment, was noticed at the Planning Commission for March 13, 2024. At least 10 days

before the first public hearing date, notices of the hearing before the Planning Commission were published in the Monterey County Weekly, posted in at least 3 different public places on and near the subject property, mailed to residents within 300 feet of the project site, and mailed or emailed to interested parties.

13. On March 13, 2024, the Monterey County Planning Commission held a duly noticed public hearing to consider and make recommendations to the Board of Supervisors regarding approving the proposed amendment to the text of the policies of the Las Palmas Ranch Specific Plan. At this hearing the Planning Commission voted [XX] and adopted Resolution [XX] recommending the Board of Supervisors certify the Final Subsequent Environmental Impact Report (FSEIR) as augmented in September 2023 for the River View Project (SCH#2017031025), approve an amendment to the LSRSP and approve a Combined Development Permit consisting of a Vesting Tentative Map to create 27 residential lots, four of which are designated for moderate income units, and an open space parcel, a Use Permit to allow Development on slopes in excess of 25%,; and adopt a Mitigation Monitoring and Reporting Plan.

14. All policies of the 2010 General Plan, Toro Area Plan, and the Las Palmas Ranch Specific Plan have been reviewed by the Planning Division staff to ensure that the proposed amendment to the Las Palmas Ranch Specific Plan is consistent with the 2010 General Plan and does not create any conflict with existing zoning of the site. The Planning Commission specifically finds that:
    a. The project site's land use designation is identified in the Toro Land Use Plan (Figure LU#10 of the 2010 General Plan) as Medium Density Residential, 2.61 units per acre;
    b. The project site's zoning classification is also Medium Density Residential, 2.61 units per acre;
    c. The County adopted the project site's current zoning classification on December 8, 1992;
    d. Pursuant to General Plan Policy LU-2.33, land designated for Medium Density Residential use is categorized as Urban Residential Land and appropriate for residential use;
    e. Pursuant to General Plan Policy LU-2.33, the proposed building coverage will be less than 35 percent of the site. The subdivided parcels would encompass approximately 160,000 square feet of the project site. The total area of the proposed project encompasses approximately 23.2 percent of the project site;
    f. Lots are clustered pursuant to Section 21.12.060.A of the County Municipal code and the Las Palmas Specific Plan.
    g. Medium Density Residential zoning identifies single family residential use as an allowed use;
    h. The amendment to the text of the policies of the Las Palmas Ranch Specific Plan would facilitate the proposed project by increasing the limit of housing units to 1,058, for the development of 27 lots proposed in the "30-Lot Subdivision" alternative and chosen project to the River View at Las Palmas Assisted Living Senior Facility FSEIR, as augmented in September 2023, for residential use.
    i. The amendment to the figures of the Las Palmas Ranch Specific Plan includes updating Figure D (Las Palmas Ranch Specific Plan Land Use Table), Figure E (Specific Plan) and Figure H (Frontal Slopes) to include Parcel Q (the subject

property) and the 27 residential units, identify Parcel Q on the land use map and delineate Parcel Q as a developable parcel, respectively.

j. The amendment to the text of the policies of the Las Palmas Ranch Specific Plan would facilitate vertical consistency with the 2010 General Plan (Land Use Plan Policy LU-2.13), the specific plan, and Monterey County Code Chapter 18.40.

DECISION

NOW, THEREFORE BE IT RESOLVED, based on the above findings and evidence and the administrative record, that the Board of Supervisors adopts a resolution to amend the text of the policies of the Las Palmas Ranch Specific Plan, as shown in the Recitals above and incorporated herein by reference.

Said decision is to be in substantial conformance with the attached plan and subject to the attached conditions where are incorporated herein by reference.

PASSED AND ADOPTED upon motion of Supervisor _____, seconded by Supervisor _____, and carried this [DATE], by the following vote to wit:

AYES:
NOES:
ABSENT:
ABSTAIN:

I, Valerie Ralph, Clerk of the Board of Supervisors of the County of Monterey, State of California, hereby certify that the foregoing is a true copy of an original order of said Board of Supervisors duly made and entered in the minutes thereof Minute Book _____ for the meeting on [DATE].

Date:
File Number:

Valerie Ralph, Clerk of the Board of Supervisors
County of Monterey, State of California

By_____
Deputy

This decision, if this is the final administrative decision, is subject to judicial review pursuant to California Code of Civil Procedure Sections 1094.5 and 1094.6. Any Petition for Writ of Mandate must be filed with the Court no later than the 90th day following the date on which this decision becomes final.

EXHIBIT B
Attachment 2a
Draft Text of Las Palmas Ranch Specific Plan Amendment

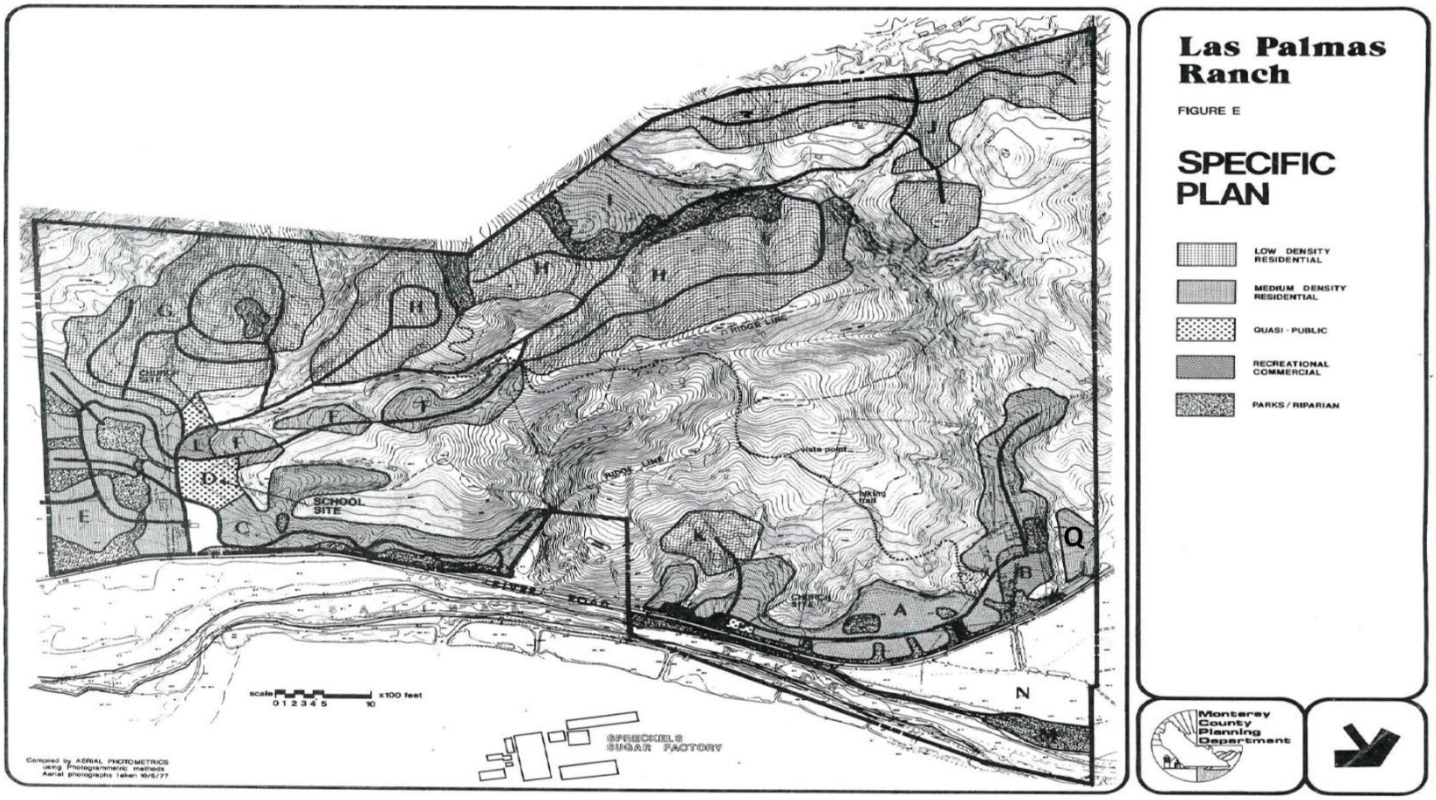
LAS PALMAS RANCH SPECIFIC PLAN AMENDMENT LANGUAGE

Policy 5 of Section C (Housing & Residential Land Use) of Chapter II
The Specific Plan allows a maximum of 1,058 residential units in accordance with Figure D and Figure E. Parcel Q at Las Palmas Ranch is designated for Medium Density Residential use, as illustrated in Figure E, and based on subsequent Policy 11, has an allowed density of 10 units per acre. However, zoning for Parcel Q is Medium Density Residential with a density of 2.61 units per acre. To confirm the allowable use on Parcel Q, the Las Palmas Ranch Specific Plan is hereby amended add:

Parcel Q of Las Palmas Ranch is amended to allow up to 27 residential units consistent with the Board of Supervisors Resolution [XX].

New Policy 12 of Section C (Housing & Residential Land Use) of Chapter II
Development of Parcel Q shall require 25% of new housing units be provided as affordable. At least 15% shall be provided onsite to moderate-income levels. The remaining 10% shall be provided through payment of an in-lieu fee.

ADC Policy Plan Areas	Residential Units		Total Units	Other Land Uses	Other Acreage	Total Acres	Density Units/AC
	Multi	Single					
A	312	0	312			104	3.00
B	-	-	-	Commercial/Recreational	6	6	N/A
C	131	0	131			62	2.11
D	-	-	-	School/Church Sites	15	15	N/A
E	0	168	168			76	2.21
F	104	0	104			32	3.25
G	0	80	80			95	.84
H	0	142	142			152	.93
I	0	46	46			28	1.64
J	0	43	43			90	.48
K	0	5	5			11	.45
L	-	-	-				
Parcel Q		*27*	*27*			*15.64*	*1.91*
M				Commercial	6	6	N/A
N				Open Space:			
O				Riparian Corridor	13		
				Agricultural Land	56		
				Neighborhood/Informal Open Spaces	65		
				Central Open Space & Frontal Slopes	767		
				TOTAL OPEN SPACE		901	N/A
TOTAL	547	~~484~~ *511*	~~1031~~ *1058*			~~1579~~ *1593.64*	~~.65 AV~~ *.66 AV*


Las Palmas Ranch
FIGURE E
SPECIFIC PLAN
LOW DENSITY RESIDENTIAL
MEDIUM DENSITY RESIDENTIAL
QUASI - PUBLIC
RECREATIONAL COMMERCIAL
PARKS / RIPARIAN
SCHOOL SITE
RIDGE LINE
vista point
hiking trail
CHERRY SITE
SPRECKELS SUGAR FACTORY
scale 0 1 2 3 4 5 x100 feet
Monterey County Planning Department

County of Monterey HCD Planning

DRAFT Conditions of Approval/Implementation Plan/Mitigation Monitoring and Reporting Plan

PLN150372

1. PD001 - SPECIFIC USES ONLY

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: This Amendment to the Las Palmas Ranch Specific Plan and Combined Development Permit (HCD-Planning File No. PLN150372) allows a 27 lot subdivision and associated site improvements, and development on slope exceeding 25 percent. The property is located at the end of Woodridge Court, Salinas (Assessor's Parcel Number 139-211-035-000), Las Palmas #1 Subdivision, Toro Area Plan. This permit was approved in accordance with County ordinances and land use regulations subject to the terms and conditions described in the project file. Neither the uses nor the construction allowed by this permit shall commence unless and until all of the conditions of this permit are met to the satisfaction of the Chief of HCD-Planning. Any use or construction not in substantial conformance with the terms and conditions of this permit is a violation of County regulations and may result in modification or revocation of this permit and subsequent legal action. No use or construction other than that specified by this permit is allowed unless additional permits are approved by the appropriate authorities. To the extent that the County has delegated any condition compliance or mitigation monitoring to the Monterey County Water Resources Agency, the Water Resources Agency shall provide all information requested by the County and the County shall bear ultimate responsibility to ensure that conditions and mitigation measures are properly fulfilled. (HCD-Planning)

Compliance or Monitoring Action to be Performed: The Owner/Applicant shall adhere to conditions and uses specified in the permit on an on-going basis unless otherwise stated.

2. PD002 - NOTICE PERMIT APPROVAL

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: The applicant shall record a Permit Approval Notice. This notice shall state: "An Amendment to the Las Palmas Ranch Specific Plan and a Combined Development Permit (Resolution Number_____) were approved by the Board of Supervisors for Assessor's Parcel Number 139-211-035-000 on April 16, 2024. The permit was granted subject to 46 conditions of approval and mitigation measures which run with the land. A copy of the permit is on file with Monterey County HCD-Planning."

Proof of recordation of this notice shall be furnished to HCD-Planning prior to issuance of grading and/or building permits, Certificates of Compliance, or commencement of use, whichever occurs first and as applicable. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to the issuance of grading and/or building permits, certificates of compliance, or commencement of use, whichever occurs first and as applicable, the Owner/Applicant shall provide proof of recordation of this notice to HCD-Planning.

3. PD003(A) - CULTURAL RESOURCES NEGATIVE ARCHAEOLOGICAL REPORT

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: 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. Monterey County HCD-Planning and a qualified archaeologist (i.e., an archaeologist registered with the Register of Professional Archaeologists) shall be immediately contacted by the responsible individual present on-site. When contacted, the project planner and the archaeologist shall immediately visit the site to determine the extent of the resources and to develop proper mitigation measures required for recovery. (HCD-Planning)

Compliance or Monitoring Action to be Performed: The Owner/Applicant shall adhere to this condition on an on-going basis.

Prior to the issuance of grading or building permits and/or prior to the recordation of the final/parcel map, whichever occurs first, the Owner/Applicant shall include requirements of this condition as a note on all grading and building plans.

4. PD005 - FISH & GAME FEE NEG DEC/EIR

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Pursuant to the State Public Resources Code Section 753.5, State Fish and Game Code, and California Code of Regulations, the applicant shall pay a fee, to be collected by the County, within five (5) working days of project approval. This fee shall be paid before the Notice of Determination is filed. If the fee is not paid within five (5) working days, the project shall not be operative, vested or final until the filing fees are paid. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Within five (5) working days of project approval, the Owner/Applicant shall submit a check, payable to the County of Monterey, to HCD-Planning.

If the fee is not paid within five (5) working days, the applicant shall submit a check, payable to the County of Monterey, to HCD-Planning prior to the recordation of the final/parcel map, the start of use, or the issuance of building permits or grading permits.

5. PD006 - CONDITION OF APPROVAL / MITIGATION MONITORING PLAN

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: The applicant shall enter into an agreement with the County to implement a Condition of Approval/Mitigation Monitoring and/or Reporting Plan (Agreement) in accordance with Section 21081.6 of the California Public Resources Code and Section 15097 of Title 14, Chapter 3 of the California Code of Regulations. Compliance with the fee schedule adopted by the Board of Supervisors for mitigation monitoring shall be required and payment made to the County of Monterey at the time the property owner submits the signed Agreement. The agreement shall be recorded. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to the issuance of building and/or grading permits, the Owner/Applicant shall:

1) Enter into an agreement with the County to implement a Condition of Approval/Mitigation Monitoring Plan;

2) Submit applicable fees at the time of submittal of the signed Agreement; and

3) Submit proof of recordation of the Agreement to HCD-Planning.

6. PD013 - STREET LIGHTING

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: All street lights in the development shall be approved by the Director of HCD - Planning. (HCD - Planning Department)

Compliance or Monitoring Action to be Performed: Prior to the issuance of grading or building permits for street lights, the Owner/Applicant shall submit three copies of the lighting plans to the HCD - Planning for review and approval. Approved lighting plans shall be incorporated into final building plans.

Prior to occupancy and on an on-going basis, the Owner/Applicant shall ensure that the lighting is installed and maintained in accordance with the approved plan.

7. PD022(A) - EASEMENT-CONSERVATION & SCENIC

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: A conservation and scenic easement shall be conveyed to the County over those portions of the property identified as “Outlot ‘B’ and Outlot ‘C’ in the Vesting Tentative Map”, where scenic resources exist. The easement shall be developed in consultation with certified professionals. An easement deed shall be submitted to, reviewed and approved by, the Director of HCD - Planning and accepted by the Board of Supervisors prior to recording the parcel/final map or prior to the issuance of grading and building permits. (HCD - Planning)

Compliance or Monitoring Action to be Performed: Prior to recordation of the parcel/final map or prior to the issuance of grading and building permits, the Owner/Applicant/Certified Professional shall submit the conservation and scenic easement deed and corresponding map, showing the exact location of the easement on the property along with the metes and bound description developed in consultation with a certified professional, to HCD - Planning for review and approval.

Prior to or concurrent with recording the parcel/final map, prior to the issuance of grading and building permits, or prior to the commencement of use, the Owner/Applicant shall record the deed and map showing the approved conservation and scenic easement. Submit a copy of the recorded deed and map to HCD - Planning.

8. PD032(A) - PERMIT EXPIRATION

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: The permit shall be granted for a time period of three (3) years, to expire on April 16, 2027, unless use of the property or actual construction has begun within this period. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to the expiration date stated in the condition, the Owner/Applicant shall obtain a valid grading or building permit and/or commence the authorized use to the satisfaction of the Chief of HCD-Planning. Any request for extension must be received by HCD-Planning at least 30 days prior to the expiration date.

9. PD036 - UTILITIES-SUBDIVISION

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: A note shall be placed on the parcel/final map or a separate sheet to be recorded with the parcel/final map indicating that "Underground utilities are required in this subdivision in accordance with Chapter 19.10.095, Title 19 of the Monterey County Code." Such facilities shall be installed or bonded through a Subdivision Improvement Agreement prior to filing the parcel/final map. The note shall be located in a conspicuous manner subject to the approval of the Director of HCD-Public Works. (HCD - Planning)

Compliance or Monitoring Action to be Performed: Prior to recording the parcel/final map, the Owner/Applicant shall place a note on the map or on a separate sheet and submit to HCD - Planning for review and approval.

The Owner/Applicant shall install or bond through a a Subdivision Improvement Agreement for the underground utility facilities.

10. PD041 - HEIGHT VERIFICATION

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: The applicant shall have a benchmark placed upon the property and identify the benchmark on the building plans. The benchmark shall remain visible on-site until final building inspection. The applicant shall provide evidence from a licensed civil engineer or surveyor to HCD-Building Services for review and approval, that the height of the structure(s) from the benchmark is consistent with what was approved on the building permit associated with this project. (HCD-Planning and HCD-Building Services)

Compliance or Monitoring Action to be Performed: Prior to the issuance of grading or building permits, the Owner/Applicant shall have a benchmark placed upon the property and identify the benchmark on the building plans. The benchmark shall remain visible onsite until final building inspection.

Prior to the final inspection, the Owner/Applicant/Engineer shall provide evidence from a licensed civil engineer or surveyor to HCD-Building Services and HCD-Planning for review and approval, that the height of the structure(s) from the benchmark is consistent with what was approved on the building permit.

11. PD052 - PRE-CONSTRUCTION MEETING

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Prior to the commencement of any grading or construction activities, a pre-construction meeting shall be held on the site. The meeting shall include representatives of each of the selected contractors, any consultant who will conduct required monitoring, the Owner/Applicant, the HCD-Planning representative, and representatives from any other appropriate County Department(s). The purpose of the meeting is to review the conditions of approval that are applicable to the grading and construction of the approved development to ensure all parties understand applicable requirements. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to commencement of any grading or construction activities, the Owner/Applicant shall contact HCD-Planning to schedule a pre-construction meeting prior to commencement of any grading or construction activities.

The Owner/Applicant shall be responsible for ensuring that all appropriate contractors and technical consultants are in attendance. HCD-Planning staff shall be responsible for identifying and notifying other County Department(s) that should attend the meeting (if applicable).

12. PDSP001 - PRIVATE ROAD MAINTENANCE

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Prior to issuance of grading and/or building permits for the project, the owner/applicant shall submit evidence of a properly executed private road maintenance agreement (i.e., an agreement between parties to a private road concerning the costs and responsibilities of those parties for upkeep and repair of the private road) to HCD-Planning. The private road maintenance agreement shall be between the owner/applicant for the subject project and the Las Palmas HOA (Las Palmas Ranch Master Association No. 1). Other acceptable forms of evidence are a written withdrawal of objections from the Las Palmas HOA, a final settlement or final judicial determination, or written documentation showing that a majority of the parties to a private road have agreed to repair and maintenance terms in light of the project.

The County is not a party to such private road maintenance agreement and does not interpret or enforce their terms and conditions, nor does the County have jurisdiction to adjudicate a dispute among the parties as to the maintenance of any private road. Pursuant to Monterey County Code Section 16.80.060.E, the HCD Chief of Planning shall have the authority to stay the expiration of the entitlement for the project for a period no greater than the number of days from initial filing of judicial proceedings to the final judicial determination or settlement regarding the access dispute. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to issuance of grading and/or building permits, the owner/applicant shall submit to HCD-Planning evidence of a properly executed private road maintenance agreement, or other acceptable form of evidence as noted above.

13. PDSP002 - CONFIRMATION OF ADEQUATE WASTEWATER TREATMENT CAPACITY (NON-STANDARD)

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: To assure that adequate waste water treatment facilities will be available to River View at Las Palmas (RVLP), no grading or building permits shall be issued for RVLP until a plan for any necessary upgrades to the Las Palmas Waste Water Treatment facilities to serve RVLP is approved by the Director of Housing and Community Development and the Regional Water Quality Control Board. The plan shall be in sufficient detail to: 1) Identify the necessary improvements to the waste water treatment facilities owned and operated California American Water Company; 2) Identify the necessary improvements, including distribution system and disposal area(s) for the additional reclaimed waste water to be generated by River View at Las Palmas; and 3) Identify a schedule for completion of those improvements.

River View at Las Palmas shall develop and maintain a minimum of 3.18 acres, on-site or off-site, for the dispersal of reclaimed wastewater attributable to the project. The location and design of those improvements shall be subject to the approval of the HCD-Planning and the Regional Water Quality Control Board. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to occupancy of any phase of the River View at Las Palmas project, all necessary waste water disposal and/or dispersal improvements for that phase shall be installed, tested and approved by HCD-Planning and the Regional Water Quality Control Board.

14. PDSP003 – REZONE TO ADD A BUILDING SITE 6 OVERLAY DISTRICT AND A TWENTY FOOT HEIGHT LIMIT (NON-STAND/

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Prior to the filing of the Final Map, the Owner/Applicant shall request in writing that the property be zoned from Medium Density Residential/2.61 units per acre with a Design Control overlay district or "MDR/2.61-D" to Medium Density Residential with Building Site 6 and Design Control overlay districts and a 20 foot height limit or "MDR/B-6-D(20)". (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to recordation of the Final Map, the Owner/Applicant shall submit an application to the County of Monterey to rezone the property in accordance with the condition language above and receive approval from the Board of Supervisors for the rezoning.

15. PDSP004 – HOMEOWNERS ASSOCIATION CC&R'S (NON-STANDARD)

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: A homeowner's association shall be formed, or the Project area shall join the Las Palmas Ranch Master Association No. 1, for the maintenance of roads, drainage facilities, and open spaces. Monterey County Housing and Community Development Director, or his/her designee, and Public Works, Facilities and Parks Director, or his/her designee shall approve documents for formation of association prior to recordation of the Final Map. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to recordation of the Final Map, the Owner/Applicant shall submit the CC&R's to Monterey County Housing and Community Development and Public Works, Facilities and Parks for review and approval.

16. STORMWATER CONTROL PLAN (PR4)

Responsible Department: Environmental Services

Condition/Mitigation Monitoring Measure: The applicant shall submit a Stormwater Control Report and a Stormwater Control Plan, prepared by a registered professional engineer, to HCD-Environmental Services for review and approval. The report and plan shall address the Post-Construction Stormwater Management Requirements (PCRs) for Development Projects in the Central Coast Region. The plan shall include the location of the drainage facilities and construction details. The Stormwater Plan shall include the construction inspection schedule that identifies when the inspections will be completed, who will conduct the inspection (i.e., PG, PE, and/or Special Inspector), a description of the required inspection, inspector name, and the completion date. Prior to issuance of any grading or building permits, the applicant shall submit certification from a licensed practitioner that they have reviewed and approved the Stormwater Control Plan for conformance with the geotechnical recommendations. (HCD-Environmental Services)

Compliance or Monitoring Action to be Performed: Prior to issuance of any grading or building permits, the applicant shall submit a Stormwater Control Report and a Stormwater Control Plan to HCD-Environmental Services for review and approval.

Prior to issuance of any grading or building permits, the applicant shall submit certification from a licensed practitioner that they have reviewed and approved the stormwater control plan for conformance with the geotechnical recommendations.

17. FIELD VERIFICATION OF POST-CONSTRUCTION STORMWATER CONTROL MEASURES (PR4)

Responsible Department: Environmental Services

Condition/Mitigation Monitoring Measure: The applicant shall provide certification from a registered Professional Engineer that the stormwater control facilities have been constructed in accordance with the approved Stormwater Control Plan. (HCD-Environmental Services)

Compliance or Monitoring Action to be Performed: Prior to final inspection, the owner/applicant shall submit a letter to HCD-Environmental Services for review and approval.

18. OPERATION AND MAINTENANCE PLAN (PR4)

Responsible Department: Environmental Services

Condition/Mitigation Monitoring Measure: The applicant shall submit an Operation and Maintenance Plan prepared by a registered Professional Engineer that includes, at a minimum, the following:
a) A site map identifying all structural Stormwater Control Measures requiring O&M practices to function as designed.
b) O&M procedures for each structural Stormwater Control Measure including, but not limited to, LID facilities, retention/detention basins, and proprietary devices.
c) The O&M Plan shall include short- and long-term maintenance requirements, recommended frequency of maintenance, and estimated cost for maintenance.
(HCD-Environmental Services)

Compliance or Monitoring Action to be Performed: Prior to final inspection, the owner/applicant shall submit the O&M Plan to HCD-Environmental Services for review and approval.

19. MAINTENANCE AGREEMENT (PR4)

Responsible Department: Environmental Services

Condition/Mitigation Monitoring Measure: The applicant shall enter into a Maintenance Agreement (Agreement) that clearly identifies the responsible party for ongoing maintenance of structural Stormwater Control Measures. The Agreement shall contain provisions for an annual drainage system report, prepared by a registered Professional Engineer, that includes the status of all structural stormwater control measures and maintenance recommendations. The annual report shall be submitted to HCD-Environmental Services, for review and approval, no later than August 15th. All recommended maintenance shall be completed by October 15th of the same year. If maintenance is required, certification shall be provided that all recommended maintenance has been completed before the start of the rainy season. (HCD-Environmental Services)

Compliance or Monitoring Action to be Performed: Prior to final inspection, the owner/applicant shall submit the signed and notarized Agreement to HCD-Environmental Services for review and approval. The approved Agreement shall be recorded, and a copy of the recorded document shall be provided to HCD-Environmental Services.

A copy of the standard Agreement can be obtained at HCD-Environmental Services.

20. CALIFORNIA CONSTRUCTION GENERAL PERMIT

Responsible Department: Environmental Services

Condition/Mitigation Monitoring Measure: The applicant shall submit a Waste Discharger Identification (WDID) number certifying the project is covered under the California Construction General Permit. (HCD-Environmental Services)

Compliance or Monitoring Action to be Performed: Prior to issuance of any grading or building permits, the applicant shall submit a WDID number certifying the project is covered under the California Construction General Permit or a letter of exemption from the Central Coast Regional Water Quality Control Board.

21. PW0007 - PARKING STANDARD

Responsible Department: Public Works

Condition/Mitigation Monitoring Measure: The parking stalls and circulation shall meet County standards, and shall be subject to the approval of Public Works. (Public Works and HCD-Development Services)

Compliance or Monitoring Action to be Performed: Prior to issuance of building and/or grading permits, the owner/applicant/engineer/architect shall prepare and submit a parking and circulation plan to Public Works for review and approval.

22. PW0045 – COUNTYWIDE TRAFFIC FEE

Responsible Department: Public Works

Condition/Mitigation Monitoring Measure: Prior to issuance of building permits, the owner/applicant shall pay the Countywide Traffic Fee or the ad hoc fee pursuant to General Plan Policy C-1.8. The fee amount shall be determined based on the parameters in the current fee schedule. (Public Works and HCD-Development Services)

Compliance or Monitoring Action to be Performed: Prior to issuance of building or grading permits, the owner/applicant shall submit payment to HCD-Building Services for the traffic mitigation fee. The owner/applicant shall also submit proof of payment to Public Works.

23. PKSSP001 – QUIMBY ACT REQUIREMENTS / LAND DEDICATION OR IN LIEU FEE (NON-STANDARD)

Responsible Department: Parks Enforcement

Condition/Mitigation Monitoring Measure: The Applicant shall comply with Monterey County Subdivision Ordinance, Title 19 Section 19.12.010 for park and recreation purposes reasonably serving the residents of the subdivision. Compliance shall occur by either dedicating land and constructing recreation improvements onsite or by paying an in-lieu fee for park land dedication in accordance with the provisions contained in Title Section 19.12.010(D). (Parks Department)

Compliance or Monitoring Action to be Performed: Prior to the recordation of the Final Map, the Owner/Applicant shall comply with the Recreation Requirements contained in Title 19 Section 19.12.010 of the Monterey County Code.

If recreation land and improvements will be dedicated on site, the applicant shall provide the Parks Department with a recreation plan and cost estimate for the improvements to be made on the dedicated parcels(s).

If the applicant pays a fee in lieu of land dedication, the Parks Department shall determine the fee in accordance with provisions contained in Section 19.12.010(D).

24. HSG001SP – INCLUSIONARY HOUSING REQUIREMENTS (NON-STANDARD)

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Prior to the recordation of the Final Map, the applicant shall comply with the County's Inclusionary Housing Ordinance #05175 by either: 1) entering an Inclusionary Housing Agreement – Developer to construct and sell 4 affordable units to moderate-income households and pay an in-lieu fee of $401,525.00 consistent with the adopted Inclusionary Housing Administrative Manual.

Compliance or Monitoring Action to be Performed: Prior to the recordation of the Final Map, the Owner/Applicant shall comply with the Inclusionary Housing, as specified in the condition language above, by entering into an Inclusionary Housing Agreement with the County of Monterey.

25. CC01 INDEMNIFICATION AGREEMENT

Responsible Department: County Counsel-Risk Management

Condition/Mitigation Monitoring Measure: The property owner agrees as a condition and in consideration of approval of this discretionary development permit that it will, pursuant to agreement and/or statutory provisions as applicable, including but not limited to Government Code Section 66474.9, defend, indemnify and hold harmless the County of Monterey or its agents, officers and employees from any claim, action or proceeding against the County or its agents, officers or employees to attack, set aside, void or annul this approval, which action is brought within the time period provided for under law, including but not limited to, Government Code Section 66499.37, as applicable. The property owner will reimburse the County for any court costs and attorney's fees which the County may be required by a court to pay as a result of such action. The County may, at its sole discretion, participate in the defense of such action; but such participation shall not relieve applicant of his/her/its obligations under this condition. An agreement to this effect shall be recorded upon demand of County Counsel or concurrent with the issuance of building permits, use of property, filing of the final map, recordation of the certificates of compliance whichever occurs first and as applicable. The County shall promptly notify the property owner of any such claim, action or proceeding and the County shall cooperate fully in the defense thereof. If the County fails to promptly notify the property owner of any such claim, action or proceeding or fails to cooperate fully in the defense thereof, the property owner shall not thereafter be responsible to defend, indemnify or hold the County harmless. (County Counsel-Risk Management)

Compliance or Monitoring Action to be Performed: Upon demand of County Counsel or concurrent with the issuance of building permits, use of the property, recording of the final/parcel map, or recordation of Certificates of Compliance, whichever occurs first and as applicable, the Owner/Applicant shall submit a signed and notarized Indemnification Agreement to the Office of County Counsel-Risk Management for review and signature by the County.

Proof of recordation of the Indemnification Agreement, as outlined, shall be submitted to the Office of County Counsel-Risk Management

26. MM AES-1: LANDSCAPE SCREENING PLAN

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: The owner/applicant shall prepare and submit a landscape plan to enhance screening from State Route 68, River Road, Reservation Road, and the adjacent neighborhood and trail. The landscaping plan shall include, but not be limited to, the following:
a. Location, species, and size of plantings, which must be native and drought tolerant;
b. Mounding, informal massing, or irregularly spaced trees, and plantings;
c. Sufficient native trees and landscaping along the perimeter of the developed area to screen the buildings from State Route 68, River Road, Reservation Road, and the adjacent neighborhood; and
d. Irrigation plan.

The landscape plans shall be subject to review and approval by HCD-Planning prior to issuance of building permits. The landscaping shall be installed and inspected prior to occupancy. All landscaped areas and/or fences shall be continuously maintained by the project proponent and all plant material shall be continuously maintained in a litter-free, weed-free, healthy, growing condition. This requirement will be included in permit conditions. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to issuance of building permits, the owner/applicant shall submit a landscape screening plan to HCD-Planning for review and approval.

Prior to occupancy, the landscaping shall be installed and inspected.

On an ongoing basis, all landscaped areas and/or fences shall be continuously maintained in a litter-free, weed-free, healthy, growing condition.

27. MM AES-2: FINAL PLAN FOR EXTERIOR COLORS & MATERIALS

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: The owner/applicant shall submit a final plan for colors and materials used for the buildings, which shall be earth-toned to blend with the existing vicinity landscape, subject to the approval of the HCD-Planning, prior to issuance of building permits. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to issuance of building permits, the owner/applicant shall submit a final exterior color and material plan to HCD-Planning for review and approval.

28. MM AES-3: FINAL IMPROVEMENT PLAN

Responsible Department: Public Works

Condition/Mitigation Monitoring Measure: The applicant's final improvement plans shall include construction of all new utility and distribution lines on the project site underground. The improvement plans shall be subject to review and approval of Monterey County Public Works prior to issuance of a grading permit. (Public Works and HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to issuance of a grading permit for the project, the owner/applicant shall submit final improvement plans to Public Works for review and approval.

On an ongoing basis, the owner/applicant shall install and maintain utility and distribution lines underground.

29. MM AES-4: EXTERIOR LIGHTING PLAN

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: All exterior lighting shall be unobtrusive, down-lit, harmonious with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. The lighting source shall be shielded and recessed into the fixture. Prior to the issuance of building permits, the applicant shall submit an exterior lighting plan as part of the construction plan set. The exterior lighting plan shall indicate the location, type, and wattage of all light fixtures and include catalog sheets for each fixture. The lighting shall comply with the requirements of the California Energy Code set forth in California Code of Regulations Title 24 Part 6. The exterior lighting plan shall be subject to approval by HCD-Planning prior to issuance of a building permit. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to issuance of a building permit, the owner/applicant shall submit an exterior lighting plan to HCD-Planning for review and approval. The approved exterior lighting plan shall be incorporated into the final building plans.

Prior to final and/or occupancy, the owner/applicant/contractor shall submit written and photographic evidence demonstrating that the exterior lighting has been installed according to the approved plan.

On an on-going basis, the owner/applicant shall ensure that the exterior lighting is installed and maintained in accordance with the approved plan.

30. MM AQ-1: DUST CONTROL MEASURES

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Prior to issuance of any grading or building permits, developers of the project site shall prepare a grading plan subject to review and approval by the Monterey County Department of Housing and Community Development (HCD) Chief of Planning. In the event that ground disturbance exceeds 2.2 acres per day for initial site preparation activities that involve extensive earth moving activities (grubbing, excavation, rough grading), and 8.1 acres per day for activities that involve minimal earth moving (e.g. finish grading) exceeding these limits, the required grading plans shall include the following dust control measures:
a. Water all active construction sites continuously. Frequency should be based on the type of operation, soil, and wind exposure;
b. Prohibit all grading activities during periods of high wind (over 15 mph);
c. Apply chemical soil stabilizers on inactive construction areas (e.g., disturbed lands within construction projects that are unused for at least four consecutive days);
d. Apply non-toxic binders (e.g., latex acrylic co-polymer) to exposed areas after cut and fill operations and hydro-seed area;
e. Maintain at least 1'-0" of free-board on haul trucks;
f. Cover inactive storage piles;
g. Sweep streets if visible soil material is carried out from the construction site;
h. Limit the area under construction at any one time.
(HCD-Planning and HCD-Environmental Services)

Compliance or Monitoring Action to be Performed: Prior to issuance of any grading or building permits, the owner/applicant/contractor shall submit a grading plan to HCD-Planning for review and approval. The dust control measures shall be included as notes on the grading plan.

31. MM AQ-2: DUST CONTROL SITE MONITOR

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Prior to commencement of construction activities, the developer and/or contractor shall appoint a construction foreman to act as site monitor to ensure that the dust control measures are implemented. Evidence of implementation shall be submitted in written form to the Monterey County Department of Housing and Community Development (HCD) Chief of Planning within three days of commencement of grading, and monthly thereafter as long as grading occurs. In addition, a publicly-visible sign written in English and Spanish with the telephone number and person to contact regarding dust complaints should be posted and continuously maintained at the project site during grading and construction activities. This person shall respond and take corrective action within 48 hours of receipt of any dust-related complaints. The phone number of the air district shall also be visible to ensure compliance with Rule 402 (nuisance). (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to commencement of grading and/or construction activities, the owner/applicant/contractor shall submit to HCD-Planning the name of the site monitor.

Within 3 days of commencement of grading and/or construction activities, the owner/applicant/contractor shall submit evidence to HCD-Planning that the dust control measures have been implemented, and that the required sign has been posted and is publicly visible.

Ongoing during grading and/or construction activities, the dust control measures and signage shall be implemented and/or maintained.

32. MM AQ-3: REDUCTION OF CONSTRUCTION EXHAUST EMISSIONS

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Prior to the onset of site preparation, grading and construction activities, the project applicant(s) or developer(s) shall require in construction contracts that all off-road construction vehicles and all construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. The developer shall reduce nitrogen oxides exhaust and particulate matter emissions by implementing the following measures prior to the start of construction:
- Contractors shall install temporary electrical service whenever possible to avoid the need for independently-powered equipment (e.g. compressors);
- Signs at the construction site shall be clearly visible to advise that diesel equipment standing idle for more than two minutes within 200 feet of sensitive receptors shall be turned off. This would include trucks waiting to deliver or receive soil, aggregate, or other bulk materials. Rotating drum concrete trucks may keep their engines running continuously if on-site and staged at least 100 feet away from residential areas;
- Properly tune and maintain equipment for low emissions;
- Stage large diesel powered equipment at least 200 feet from any sensitive land uses (e.g., occupied residences);
- All equipment shall be checked by a certified visible emissions evaluator;
- All non-road diesel construction equipment shall at a minimum meet Tier 3 emission standards listed in the Code of Federal Regulations Title 40, Part 89, Sub part B, §89.112; and
- Whenever feasible, construction equipment shall use alternative fuels such as compressed natural gas, propane, electricity, or bio diesel.
(HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to the onset of site preparation, grading and/or construction activities, the owner/applicant(s) or contractor shall submit evidence demonstrating compliance with Mitigation Measure AQ-3 to HCD-Planning for review and approval.

33. MM BIO-1: PRE-CONSTRUCTION SURVEY - BADGER

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Prior to the start of construction activities, a qualified Monterey County-approved consulting biologist shall conduct pre-construction surveys of the grassland habitat on the site to identify any potential American badger burrows/dens. These surveys shall be conducted no more than 15 days prior to the start of construction. If a potential American badger burrow/den is found during the surveys, coordination with the California Department of Fish & Wildlife (CDFW) shall be undertaken in order to develop a suitable strategy to avoid impacts to American badger. After CDFW review and approval, impacts to active American badger dens shall be avoided by establishing exclusion zones around all active badger dens, within which construction related activities shall be prohibited until denning activities are complete or the den is abandoned. A qualified biologist shall monitor each den once per week in order to track the status of the den and to determine when a den area has been cleared for construction. The project proponent shall be responsible for the implementation of this mitigation measure, subject to monitoring by the Monterey County Department of Housing and Community Development. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to the start of construction activities, the owner/applicant shall submit evidence of pre-construction surveys from a qualified Monterey County-approved consulting biologist to HCD-Planning.

If a potential American badger burrow/den is found during the surveys, the owner/applicant shall then submit evidence to HCD-Planning showing coordination with and approval by the CDFW of a strategy to avoid impacts to American badger.

After CDFW review and approval, the avoidance strategies shall be implemented by the owner/applicant, and evidence of such implementation submitted to HCD-Planning.

If avoidance strategies are implemented, then a qualified biologist shall submit evidence of monitoring to HCD-Planning on a weekly basis.

34. MM BIO-2: PRE-CONSTRUCTION SURVEY - BURROWING OWL

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: To avoid/minimize impacts to burrowing owls potentially occurring on or adjacent to the project site, the project proponent shall retain a qualified Monterey County-approved consulting biologist to conduct a two-visit (i.e., morning and evening) presence/absence survey at areas of suitable habitat on and adjacent to the project site no less than 14 days prior to the start of construction or ground disturbance activities. Surveys shall be conducted according to methods described in the California Department of Fish & Wildlife (CDFW) Staff Report on Burrowing Owl Mitigation (CDFW 2012). If these pre-construction "take avoidance" surveys performed during the breeding season (February through August) or the non-breeding season (September through January) locate occupied burrows in or near construction areas, consultation with the CDFW shall occur to interpret survey results and develop a project-specific avoidance and minimization approach. The project proponent shall be responsible for the implementation of this mitigation measure, subject to monitoring by the Monterey County Department of Housing and Community Development. (HCD-Planning)

Compliance or Monitoring Action to be Performed: No less than 14 days prior to the start of either ground disturbance or construction activities, the owner/applicant shall submit evidence to HCD-Planning of a two-visit pre-construction survey from a qualified Monterey County-approved consulting biologist.

If an occupied burrow is located during the survey, the owner/applicant shall then submit evidence to HCD-Planning showing coordination with and approval by the CDFW of an avoidance and minimization strategy.

After CDFW review and approval, the avoidance and minimization strategy shall be implemented by the owner/applicant, and evidence of such implementation submitted to HCD-Planning.

35. MM BIO-3: PRE-CONSTRUCTION SURVEY - DUSKY-FOOTED WOODRAT

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: A qualified Monterey County-approved consulting biologist shall conduct pre-construction surveys for woodrat nests within the development footprint. These surveys shall be conducted no more than 15 days prior to the start of construction. All woodrat middens shall be flagged for avoidance of direct construction impacts where feasible. If impacts cannot be avoided, woodrat middens shall be dismantled no more than three days prior to construction activities starting at each midden location. All vegetation and duff materials shall be removed from three feet around the midden prior to dismantling so that the occupants do not attempt to rebuild. Middens are to be slowly dismantled by hand in order to allow the occupants to disperse. The project proponent shall be responsible for the implementation of this mitigation measure, subject to monitoring by the Monterey County Department of Housing and Community Development. (HCD-Planning)

Compliance or Monitoring Action to be Performed: No more than 15 days prior to the start of construction activities, the owner/applicant shall submit evidence to HCD-Planning of a pre-construction survey from a qualified Monterey County-approved consulting biologist.

If an occupied midden is located during the survey, the owner/applicant shall then submit evidence to HCD-Planning demonstrating implementation of the requirements of this mitigation measure.

36. MM BIO-4: FOCUSED SURVEY - BATS

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Prior to tree removal activities, the project proponent shall retain a qualified Monterey County-approved consulting biologist to conduct a focused survey for bats and potential roosting sites in trees to be removed and trees within 250 feet of the development footprint. These surveys shall be conducted no more than 15 days prior to the start of construction. The surveys can be conducted by visual identification and 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.

If no roosting sites or bats are found, a letter report confirming absence shall be sent to the Monterey County Department of Housing and Community Development (HCD) and no further mitigation is required.

If bats or roosting sites are found, a letter report and supplemental documents shall be provided to HCD prior to grading permit issuance and the following monitoring, exclusion, and habitat replacement measures shall be implemented:
a. If bats are found roosting outside of the nursery season (which is May 1 through October 1), they shall be evicted as described under (b) below. 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. If the roost is determined to not be a maternal roost, then the bats shall be evicted as described under (b) below. 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 250-foot buffer zone (or different size if determined in consultation with the California Department of Fish & Wildlife (CDFW)) shall be established around the roosting site within which no construction activities including tree removal shall occur until after the nursery season.

b. If a non-breeding bat hibernaculum is found in a tree or snag scheduled for removal, the individuals will be safely evicted, under the direction of a qualified bat biologist and in consultation with the CDFW. Methods could include carefully opening the roosting area by hand to expose the cavity. Removal of the tree or snag shall be conducted no earlier than the following day (i.e., at least one night will be provided between initial disturbance and the tree removal). This action will allow bats to leave during dark hours, which increases their chance of finding new roosts with a minimum of potential predation.

The project proponent shall be responsible for the implementation of this mitigation measure, subject to monitoring by the HCD. (HCD-Planning)

Compliance or Monitoring Action to be Performed: No more than 15 days prior to tree removal activities, the owner/applicant shall submit evidence to HCD-Planning of a focused survey from a qualified Monterey County-approved consulting biologist.

If bats or roosting sites are found, the owner/applicant shall then submit evidence to HCD-Planning demonstrating implementation of the requirements of this mitigation measure.

37. MM BIO-5: PRE-CONSTRUCTION SURVEY - NESTING BIRDS

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: To avoid possible impacts to nesting birds on and adjacent to the project site, if noise generation, ground disturbance, vegetation and tree removal, including removal of non-native trees, or other construction activities begin during the nesting bird season (February 1 to September 15), or if construction activities are suspended for at least two weeks and recommence during the nesting bird season, then the project proponent shall retain a qualified Monterey County-approved consulting biologist to conduct a pre-construction survey for nesting birds. The survey shall be performed within suitable nesting habitat areas on and adjacent to the site to ensure that no active nests would be disturbed during project implementation. This survey shall be conducted no more than one week prior to the initiation of disturbance or construction activities.

If no active bird nests are detected during the survey, then project activities can proceed as scheduled. However, if an active bird nest of a native species is detected during the survey, then a plan for bird nest avoidance shall be prepared by the qualified biologist to determine and clearly delineate an appropriately sized, temporary protective buffer area around each active nest, depending on the nesting bird species, existing site conditions, and type of proposed disturbance or construction activities. The protective buffer area around an active bird nest is typically 75-250 feet, determined at the discretion of the qualified biologist.

To ensure that no inadvertent impacts to an active bird nest will occur, no disturbance and/or construction activities shall occur within the protective buffer area(s) until the juvenile birds have fledged (left the nest), and there is no evidence of a second attempt at nesting, as determined by the qualified biologist.

The project proponent shall be responsible for implementation of this mitigation measure with oversight by the Monterey County Resource Management Agency. Compliance with this measure shall be documented and submitted to the county. (HCD-Planning)

Compliance or Monitoring Action to be Performed: No more than one week prior to initiation of noise generation, ground disturbance, vegetation and tree removal (including removal of non-native trees), or other construction activities either during the nesting bird season (February 1 to September 15), or if construction activities are suspended for at least two weeks and recommence during the nesting bird season, the owner/applicant shall submit to HCD-Planning a nesting survey prepared by a County-approved consulting biologist to ensure that no active nests would be disturbed during project implementation.

If an active bird nest is located during the survey, the owner/applicant shall then submit evidence to HCD-Planning demonstrating implementation of the requirements of this mitigation measure.

38. MM BIO-6: PRE-CONSTRUCTION SURVEY - CTS

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Prior to the start of construction, a qualified California tiger salamander (CTS) biologist shall conduct a pre-construction survey for CTS. The survey shall include a transect survey over the entire project disturbance footprint (including access and staging areas), and scoping of burrows for CTS occupancy. If CTS are documented on the surface or in burrows, no work can be conducted until the individuals leave the site of their own accord. If no CTS are found, the biologist shall collapse all small mammal burrows onsite within the disturbance footprint. After all burrows have been collapsed, a silt fence shall immediately be installed around the edges of the work area to the existing road. This fencing shall be buried to at least three inches. No equipment or disturbance shall be allowed outside of the silt fence, and fencing shall remain in place until the project is complete. If a California tiger salamander is observed at any time during burrow excavation or construction, all work shall cease, and the applicant shall contact the U.S. Fish & Wildlife Service for guidance before commencing project activities. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to the start of construction, the owner/applicant shall submit evidence to HCD-Planning of a pre-construction survey for CTS completed by a qualified CTS biologist.

The owner/applicant shall also submit evidence, prepared by the biologist, to HCD-Planning demonstrating implementation of the requirements of this mitigation measure.

39. MM CTRA-1: TRAFFIC IMPACT FEES

Responsible Department: Public Works

Condition/Mitigation Monitoring Measure: The applicant shall pay applicable Transportation Agency for Monterey County (TAMC) and County of Monterey traffic impact fees. (Public Works)

Compliance or Monitoring Action to be Performed: Prior to issuance of grading and/or construction permits, the owner/applicant shall submit payment for the applicable fees to HCD-Building Services.

40. MM ENG-1: ENERGY CONSERVATION POLICY CONSISTENCY

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Prior to approval of building permits for each of the project components, the owner/applicant shall submit a report to HCD-Planning demonstrating how the project is consistent with the energy conservation policies identified in the Las Palmas Ranch Specific Plan. (HCD-Planning)

Compliance or Monitoring Action to be Performed: Prior to final of building permits for each of the project components, the owner/applicant shall submit a report to HCD-Planning demonstrating how the project is consistent with the energy conservation policies identified in the Las Palmas Ranch Specific Plan.

41. MM TRA-3: EMERGENCY ACCESS IMPROVEMENTS

Responsible Department: Public Works

Condition/Mitigation Monitoring Measure: Prior to occupancy of the proposed senior assisted living community, the owner/applicant shall install eight-foot turnouts on the entering and exiting lanes of the proposed extension of Woodridge Court between Country Park Road and the first internal parking lot aisle on the project site. Also, prior to occupancy and if required by the local fire district, the owner/applicant shall install grass grid pavers on the section of lawn area between Woodridge Court and Country Park Road to provide an all-weather surface for secondary access. (Public Works)

Compliance or Monitoring Action to be Performed: Prior to occupancy, the owner/applicant shall install eight-foot turnouts on the entering and exiting lanes of the proposed extension of Woodridge Court between Country Park Road and the first internal parking lot aisle on the project site.

Prior to occupancy and if required by the local fire district, the owner/applicant shall install grass grid pavers on the section of lawn area between Woodridge Court and Country Park Road to provide an all-weather surface for secondary access.

42. EHSP01 – DESIGN WATER SYSTEM IMPROVEMENTS (Non-Standard) The water system improvements proposed with thi

Responsible Department: Health Department

Condition/Mitigation Monitoring Measure: The water system improvements proposed with this application shall meet the California Waterworks Standards (Title 22 of the California Code of Regulations) and relevant sections of Title 17 of the California Code of Regulations pertaining to cross-connection control.

Compliance or Monitoring Action to be Performed: Prior to recordation of the final map or execution of a Subdivision Improvement Agreement the applicant shall submit engineered water system improvement plans to the State Water Resources Control Board – Division of Drinking Water (SWRCB-DDW) and Cal-Am for review and acceptance. Submit to the EHB a copy of the approved plans and documentation confirming that the plans are acceptable to SWRCB-DDW and Cal-Am.

43. EHSP02 - FIRE FLOW STANDARDS (Non-Standard)

Responsible Department: Health Department

Condition/Mitigation Monitoring Measure: Design the water system improvements to meet fire flow standards as required and approved by the local fire protection agency.

Compliance or Monitoring Action to be Performed: Prior to recordation of the final map, execution of a Subdivision Improvement Agreement, or issuance of construction permit, the applicant shall submit plans for the proposed water system improvements to the local fire protection agency for review and acceptance.

Submit a set of signed or wet-stamped water system plans approved by the local fire protection agency to EHB for review and acceptance.

44. EHSP03 – INSTALL OR BOND WATER SYSTEM IMPROVEMENTS (Non-Standard)

Responsible Department: Health Department

Condition/Mitigation Monitoring Measure: Pursuant to Monterey County Code, Chapter 19.13, Improvement Agreements, the owner shall install the water system improvements to and within the subdivision and any appurtenances needed.
OR
The owner shall enter into a Subdivision Improvement Agreement with the County that shall provide security guaranteeing the installation of the water system improvements.

Compliance or Monitoring Action to be Performed: Prior to filing the final map, the applicant shall:
- Install the water system improvements to and within the subdivision and any appurtenances needed and obtain approval of installation from the entity that will take ownership of the sewer system infrastructure.
OR
Execute a Subdivision Improvement Agreement that is acceptable to EHB. Record the Subdivision Improvement Agreement with the final map.

45. EHSP04 - INSTALL/BOND SEWER SYSTEM IMPROVEMENTS

Responsible Department: Health Department

Condition/Mitigation Monitoring Measure: The developer shall install the sewer system improvements to and within the subdivision and any appurtenances needed per Monterey County Code Chapter 19.13 Improvement Agreements.
OR
The developer shall enter into a Subdivision Improvement Agreement with the County that shall provide security guaranteeing the installation of the sewer system improvements per Monterey County Code Chapter 19.13 Improvement Agreements.

Compliance or Monitoring Action to be Performed: Prior to filing the final map, install the sewer system improvements to and within the subdivision and any appurtenances needed and obtain approval of installation from Cal Am. Submit evidence of approval to Environmental Health.
OR
Provide Environmental Health Bureau with a draft of the Subdivision Improvement Agreement for review and approval. Record the Subdivision Improvement Agreement with the final map.

46. EHSP05 - SEWER SYSTEM IMPROVEMENT DESIGN

Responsible Department: Health Department

Condition/Mitigation Monitoring Measure: Engineered plans for the sewer system including all necessary redundancies shall be submitted to and approved by Cal Am. Plans shall be in conformance with Monterey County Code, Chapter 19.13 and the California Plumbing Code, Title 24 part 5 of the California Code of Regulations.

Compliance or Monitoring Action to be Performed: Prior to filing the final map, submit plans to Environmental Health Bureau with written verification from Cal Am that plans have been reviewed and approved.

N

SCALE IN FEET

0 50 100 200

GATEWAY ENGINEERING, INC.
CIVIL ENGINEERS I LAND SURVEYORS
P. 559-320-0344 I F. 559-320-0345 I WWW.GATEWAYENG.COM
405 PARK CREEK DRIVE, CLOVIS, CA 93611-4435

SITE INFORMATION:

1.	SITE ADDRESS:	NOT ASSIGNED (PARCEL Q, SALINAS, CA)
2.	APN:	139-211-035
3.	OWNER/SUBDIVIDER:	RIVER VIEW AT LAS PALMAS, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY
4.	ENGINEER:	DANIEL K. BOND, P.E. 57,133
5.	GENERAL PLAN:	RESIDENTIAL – MEDIUM DENSITY 2.61 U/AC
6.	EXISTING ZONING:	MDR/2.61 U/A
7.	PROPOSED ZONING:	MDR/2.61 U/A
8.	TOTAL SITE AREA:	15.64± AC (GROSS)
9.	ZONE CLASSIFICATION:	MDR (MEDIUM DENSITY RESIDENTIAL); CURRENTLY VACANT LAND
10.	PROPOSED TOTAL LOTS:	(27) FULLY DEVELOPED LOTS AND (3) OUTLOTS
11.	ALLOWED BUILDING HEIGHT:	30'-0" MEASURED FROM AVERAGE GRADE
12.	PROPOSED BUILDING HEIGHT:	20' MAXIMUM MEASURED FROM AVERAGE GRADE

NOTES:

1. WATER BY CALIFORNIA WATER SERVICE
2. SEWER DISPOSAL BY CALIFORNIA AMERICAN WATER SUPPLY
3. UNDERGROUND POWER BY PG&E
4. NATURAL GAS BY PG&E
5. STORM DRAIN SHALL SURFACE DRAIN AND CONVEYED VIA UNDERGROUND STORM DRAIN COLLECTION SYSTEM TO EXISTING CULVERT..
6. GRADING AND DRAINAGE PLAN SHALL BE PREPARED PER MONTEREY COUNTY CODE SECTION 19.10.
7. EROSION CONTROL PLAN SHALL BE PREPARED PER MONTEREY COUNTY CODE SECTION 16.08
8. GEOLOGIC AND SOILS STUDY PERFORMED BY LANDSET ENGINEERS, INC.
9. THERE ARE NO EXISTING STRUCTURES ON SITE.
10. THERE ARE NO EXISTING WATER COURSES ON SITE.
11. THERE IS ONE EXISTING WATER WELL ON SITE.
12. THERE ARE ±70 EXISTING EUCALYPTUS TREES ON SITE TO BE REMOVED.

FLOOD HAZARD NOTE:

SUBJECT PROPERTY IS LOCATED IN ZONE X AND IS DESIGNATED AS AREAS OF 0.2% ANNUAL CHANCE FLOOD; AREAS OF 1% ANNUAL CHANCE FLOOD WITH AVERAGE DEPTHS OF LESS THAN 1 FOOT OR WITH DRAINAGE AREAS LESS THAN 1 SQUARE MILE AND AREAS PROTECTED BY LEVEES FROM 1% ANNUAL CHANCE FLOOD AS SHOWN ON FEMA MAP NUMBER 06053C0360G, DATED APRIL 02, 2009.

LEGEND

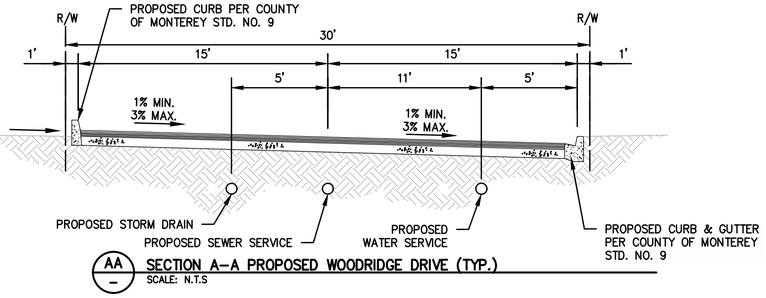
- PROPOSED A.C. PAVEMENT
- GEOLOGIC BUILDING ENVELOPE
- EXISTING PROPERTY BOUNDARY
- EXISTING EASEMENT
- PROPOSED PARCEL LINE

PARCEL TABLE

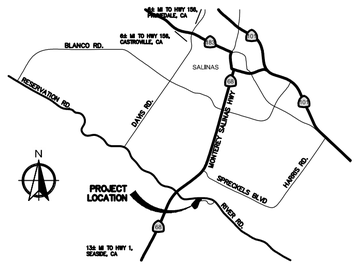
PARCEL #	AREA (SQ. FT.)
1	6365
2	4733
3	5413
4	5817
5	7494
6	6394
7	3397
8	3400
9	3400
10	3399
11	5100
12	4250
13	4250
14	4250
15	5023
16	11785
17	10977
18	5750
19	5775
20	5775
21	6500
22	7034
23	6578
24	6079
25	6410
26	6445
27	6721

OUTLOT TABLE

OUTLOT #	AREA (SQ. FT.)
OUTLOT "A"	56856
OUTLOT "B"	456194
OUTLOT "C"	11135



AA — SECTION A–A PROPOSED WOODRIDGE DRIVE (TYP.)
SCALE: N.T.S



VICINITY MAP

SCALE: 1" = 2000'

LEGAL DESCRIPTION:

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE UNINCORPORATED AREA IN COUNTY OF MONTEREY, STATE OF CALIFORNIA AND IS DESCRIBED AS FOLLOWS:

PARCEL I:

PARCEL Q, AS SAID PARCEL IS SHOWN ON THAT CERTAIN MAP ENTITLED "AMENDED MAP OF LAS PALMAS RANCH COREY HOUSE AREA/UNIT 1", FILED JUNE 15, 1989 IN VOLUME 16, OF "CITIES AND TOWNS", AT PAGE 70, IN THE OFFICE OF THE COUNTY RECORDER OF THE COUNTY OF MONTEREY, STATE OF CALIFORNIA.

EXCEPT THEREFROM ALL UNDERGROUND WATER RIGHTS AS DESCRIBED IN THE DEED TO CALIFORNIA WATER SERVICE COMPANY, A CALIFORNIA CORPORATION RECORDED OCTOBER 25, 1989 IN REEL 2427, PAGE 476, OFFICIAL RECORDS.

PARCEL II:

A NON-EXCLUSIVE EASEMENT FOR INGRESS, EGRESS, ROAD AND UTILITIES OVER THAT PORTION OF RIVER RUN ROAD AND WOODRIDGE COURT BEING A PORTION OF COMMON AREA PARCEL C AND LAS PALMAS ROAD BEING COMMON AREA PARCEL A AS SHOWN AND DESIGNATED ON THAT MAP ENTITLED "AMENDED MAP OF LAS PALMAS RANCH COREY HOUSE AREA/UNIT 1 TRACT 1086A" FILED JUNE 15, 1989, IN VOLUME 16, MAPS OF "CITIES AND TOWNS", AT PAGE 70, OFFICIAL RECORDS OF MONTEREY COUNTY, CALIFORNIA. SAID EASEMENT SHALL BE APPURTENANT TO PARCEL Q AS SHOWN AND DESIGNATED ON THE ABOVE REFERRED TO MAP OF TRACT 1086A.

APN: 139-211-035

TENTATIVE VESTING TRACT MAP

IN THE UNINCORPORATED AREA, COUNTY OF MONTEREY, STATE OF CALIFORNIA
TOWNSHIP 20 SOUTH, RANGE 15 EAST, MOUNT DIABLO BASE AND MERIDIAN,
SURVEYED AND PLATTED IN JUNE 2023
FOR
RIVER VIEW AT LAS PALMAS, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY
BY
GATEWAY ENGINEERING, INC.
SHEET 1 OF 1

K:\GATEWAY PROJECTS\COUNTRY ROADS\19-103 COALINGA\DRAWINGS\EXHIBIT\19-103 TENTATIVE PARCEL MAP.DWG-VANG THAO

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EXHIBIT B
Attachment 3

DRAFT USE PERMIT AND VESTING TENTATIVE MAP LOT SUBDIVISION RESOLUTION

Before the Board of Supervisors in and for the County of Monterey, State of California

In the matter of the application of:
RIVER VIEW AT LAS PALMAS LLC (PLN150372)
RESOLUTION NO. 23 - XX
Resolution by the Board of Supervisors approving a Combined Development Permit consisting of:

1. a Vesting Tentative Map to create 27 residential lots, including four moderate income units, and an open space parcel;
2. a Use Permit to allow development on slopes in excess of 25% for subdivision improvements; and
3. Adopt a Mitigation Monitoring and Reporting Plan.

[PLN150372, River View at Las Palmas LLC, Salinas, Toro Area Plan, (Assessor's Parcel Number: 139-211-035-000)]

The RIVER VIEW AT LAS PALMAS LLC application (PLN150372) came on for a public hearing before the Monterey County Board of Supervisors on [DATE]. Having considered all the written and documentary evidence, the administrative record, the staff report, oral testimony, and other evidence presented, the Monterey County Board of Supervisors finds and decides as follows:

FINDINGS

1. FINDING: **CONSISTENCY** – The proposed project and/or use, as conditioned, is consistent with the policies of the Monterey County 2010 General Plan, Toro Area Plan, Las Palmas Ranch Specific Plan (LPRSP), Monterey County Subdivision Ordinance (Title 19), Monterey County Zoning Ordinance (Title 21), and other County health, safety, and welfare ordinances related to land use development.

EVIDENCE: a) Project Description. The project (Project) involves a Combined Development Permit consisting of a Vesting Tentative Map for the subdivision of a 15.64 lot into 27 residential lots, four of which will be designated for moderate income units, and an open space parcel, and a Use Permit to allow development on slopes exceeding 25 percent.

b) Modified Project Scope. In 2015, the County of Monterey received an application proposing a facility that would be licensed by the State of California as a Residential Care Facility for continuum of care in the form of 13 residential Casitas, an Assisted Living Facility with 40 units and Memory Care Facility with 39 units. The project would have removed approximately 80 eucalyptus trees and replaced them with landscaping designed to both enhance residents' living environment and screen views of the project from neighboring properties and State Route 68 (SR 68). On February 12, 2020, the Planning Commission adopted Resolution Nos 20-004, 20-005 and 20-006 recommending the Board of Supervisors certify the Final Subsequent Environmental Impact Report (FSEIR), amend the LPRSP and approved the project for a senior living facility. On October 12, 2021, the Board voted to return the matter back to staff for further analysis into the original project with an expanded look into the EIR, community benefit analysis and affordable housing options. On September 2, 2022, the applicant modified the project scope to an up to 30 lot residential subdivision in response to the Board's direction to provide a project that better aligned with the existing residential subdivisions within Las Palmas. As discussed in Finding 4 and supporting evidence, the subdivision has been further reduced to 27 residential lots, four of which will be designated for moderate income units, to comply with the request of the Las Palmas Homeowner's Association to create no more than 28 residential lots.

c) During the course of review of this application, the project has been reviewed for consistency with the text, policies, and regulations in the:

- 2010 Monterey County General Plan (General Plan);
- Toro Area Plan (TAP);
- Las Palmas Ranch Specific Plan (LPRSP);
- Monterey County Subdivision Ordinance (Title 19); and
- Monterey County Zoning Ordinance (Title 21).

No conflicts were found to exist. The County received communications during the course of review of the project indicating inconsistencies with the text, policies, and regulations in these documents; however, these comments were relative to the original scope for the senior living facility and not the Project as described in Evidence "a" above. The County finds that the project as proposed is consistent with the text, policies, and regulations in the applicable documents above.

d) General Plan Consistency. The project has been reviewed for consistency with applicable policies of the 2010 General Plan. Based on the following, the project is found to be consistent. The County specifically finds that:

- In accordance with General Plan Policies LU-1.7, LU-8.2, OS-1.5, and OS-1.8, the residential lots have been clustered in the flattest area of the site which is most suitable for development. Appropriate infrastructure to support the

development exists, utilities will be extended to serve the residential lots and a new roadway will be provided.

- General Plan Policy LU-1.9 prioritizes infill of vacant non-agricultural lands in existing developed areas and shall be compatible with surrounding land uses and development. As demonstrated in subsequent Evidence "f", the subject property is part of the Las Palmas residential development and is designated for Medium Density Residential use.
- In accordance with General Plan Policy LU-1.13, the project has been conditioned requiring submittal of an exterior lighting plan to ensure street lights are unobtrusive and constructed or located so that only the intended area is illuminated, long range visibility is reduced of the lighting source, and off-site glare is fully controlled.
- General Plan Policy LU-1.20 requires that residential development be limited to area build-out as specified in the land use/density designations as mapped in the area plans and adopted as part of this General Plan. As demonstrated in subsequent Evidence "e", the project is within the allowed density as specific in the Toro Land Use Plan map.
- In accordance with General Plan Policy LU-2.5, the project provides adequate circulation and rights-of-way. See subsequent Evidence "f" and Finding No. 8, Evidence "I".
- In accordance with General Plan Policies LU-2.7, LU-8.5 and OS-5.11, open space is provided on the fringes of the residential lots. See subsequent Evidence "f"; Finding No. 5, Evidence "c"; and Finding 8, Evidence "n".
- General Plan Policy LU-2.13 requires the County assure consistent application of an Affordable Housing Ordinance that requires 25% of new housing units be affordable to very low, low, moderate, and workforce income households. As demonstrated in Finding No. 4 and supporting evidence, the project meets the County's inclusionary housing requirement. As specified in Finding No. 4, Evidence "e", the project includes an LPRSP amendment to achieve vertical consistency with Policy LU-2.13, the LPR SP, and Monterey County Code Chapter 18.40 - Inclusionary Housing Ordinance of the County of Monterey.
- In accordance with General Plan Policy LU-2.33, the proposed building coverage will be less than 35 percent of the site. The subdivided parcels would encompass approximately 160,000 square feet of the project site. The total area of the proposed project encompasses approximately 23.2 percent of the project site.
- Pursuant to General Plan Policy LU-2.33a, land designated for Medium Density Residential use is categorized as Urban Residential Land and appropriate for a range of residential uses and housing types, recreation, public and quasi-public

uses, and other uses that are incidental and subordinate to the residential use and character of the area.

- In accordance with General Plan Policies C-1.1, C-1.2, C-1.8, C-1.9, and C-1.11, the project has been conditioned requiring the applicant to pay County-wide and regional traffic fees which will be used to fund circulation improvement project.
- In accordance with General Plan Policies C-5.4 and OS-1.12, the project has been designed, mitigated and conditioned to reduce impacts of scenic views from SR 68.
- As demonstrated in Finding No. 9 and supporting evidence, the project is consistent with General Plan Policy OS-3.5.
- In accordance with General Plan Policy OS-5.6, native oak trees will be used to fulfill the project's landscape requirements.
- As demonstrated in Finding No. 2, Evidence "b" and "c", conclusions contained in the geologic report prepared for the project support project consistency with General Plan Policies S-11, S-1.3, S-1.6, S-1.7, and S-1.8.
- As demonstrated in subsequent Evidence "f" and Finding No. 3, Evidence "d", the project as proposed and conditioned is consistent with 2010 General Plan drainage policies S-3.1, S-3.2, S-3.3 and S-3.9.
- As demonstrated in subsequent Evidence "f" and Finding No. 10 and supporting evidence, the project as proposed and conditioned is consistent with 2010 General Plan fire hazard policies S-4.8, S-4.9, S-4.13, S-4.14, S-4.27.

e) Toro Area Plan Consistency. The project has been reviewed for consistency with applicable policies of the Toro Area Plan (TAP). Based on the following, the project is found to be consistent. The County specifically finds that:

- The project site's land use designation is identified in the Toro Land Use Plan (Figure LU#10 of the 2010 General Plan) as Medium Density Residential, 2.61 units per acre. The project includes the subdivision of a 15.64 acre parcel to create 27 residential parcels and 1 open space parcel, resulting in a density of 1.8 units per acre, consistent with the allowed land use and density of the TAP.
- TAP Policy T-1.5 requires subdivisions be designed so that new lots have building sites located outside of the critical viewshed. As demonstrated in subsequent Evidence "f", Finding No. 5 and supporting evidence, the project is consistent with this policy as well as Policies T-3.1, T-3.2, T-3.4, T-3.5 and T-3.6.
- In accordance with TAP Policy T-2.5 the project has been conditioned to require contribution of their fair-share payment to expedite funding and construction of Highway 68 improvements.
-

f) LPRSP Consistency. The project has been reviewed for consistency with applicable policies of the Las Palmas Ranch Specific Plan. Based on the following, the project is found to be consistent. The County specifically finds that:

- LPRSP Figure E designates the subject property as "Medium Density Residential". LPR SP Chapter II, Section C, Policy 11 states that a Development Incentive Zone of ten acres shall be provided within the areas designated in the specific plan for medium density residential development. The project includes the subdivision of a 15.64 acre parcel to create 27 residential parcels and 1 open space parcel, resulting in a density of 1.8 units per acre. The project is consistent with the land use designation, the allowed density of the specific plan and all other housing and residential land use policies in LPRSP, Chapter II, Section C, except for Policy 5. Creation of 27 new residential units is in exceedance of the total residential units allowed in the plan area. This inconsistency is addressed in an amendment to LPRSP (see subsequent Evidence "g") processed concurrently with this Vesting Tentative Map and Use Permit.
- The project is consistent with the applicable circulation policies in LPRSP, Chapter II, Section E. Consistent with Policy 1, the Quimby act condition (Condition No. 23) requires access any onsite parks or recreational areas. There are no commercial or education areas proposed with the project. In compliance with Policy 3, each unit will have a driveway and space for off-street parking. Thirteen additional off-street parking spaces are proposed throughout the subdivision. Consistent with Policies 4 and 5, the proposed roadway is suitable for emergency vehicle access and there are no areas of the roadway that exceed a 15% grade. Consistent with Policy 6, the roadway will be privately owned and maintained by a Homeowners Association. Consistent with Policy 7, the internal circulation system will continue to operate at a Level of Service "C" or better. The River View traffic study evaluated 8 trips per day per unit and estimated the internal circulation system for Las Palmas will continue to operate at a Level of Service "A". The proposed roadway has been designed per Policies 8, 9 and 10, and to be consistent with the existing Las Palmas subdivisions. The site is not located perpendicular to a viewing area, nor would it require excessive cut and fill. Ground disturbance has been minimized to the maximum extent to retain rural character and reduce potential visual impacts. Policy 11 is not applicable at this time as street signs are not currently proposed. Consistent with Policies 14 and 15, the project proposes intra-subdivision traffic as opposed to an additional connection directly to River Road. Consistent with Policies 16 and 17, the project has been conditioned

(Condition No. 39) to pay applicable traffic impact fees as mitigation for impacts to Highway 68. The amount shall be calculated using the current cost index, consistent with Policy 18.

- As demonstrated in Finding No. 5 and supporting evidence, the project is consistent with the applicable conservation and open space policies in LPRSP, Chapter II, Section F. Consistent with Policies 1, 2 and 3, the development has been designed and clustered to minimize visual impacts to visually sensitive areas. Consistent with Policies 4, 5, and 6, approximately two thirds of the existing parcel will be placed into a conservation and scenic easement and designated as Open Space. Policies 7 and 8 are addressed under the circulation policies above. Consistent with Policies 9 and 10, vegetative screening and natural landscaping will be utilized over 50 feet away from River Road. The project has been condition (Condition No. 14) to apply Design District Overlay to the final Zoning of the subdivided parcels to ensure consistency with Policy 11. All building materials and finished shall be reviewed prior to the approval of the future single family dwellings. Consistent with Policy 12, an erosion control plan was submitted and analyzed under the FSEIR. The Quimby act condition (Condition No. 23) will ensure consistency with Policy 13.
- The project is consistent with the applicable energy conservation policies in LPRSP, Chapter II, Section G. Although construction of residences is not part of the subdivision, compliance with Building Code regulations related to energy will be required and enforced as part of the construction permit process.
- The project is consistent with the applicable design and sensitivity policies in LPRSP, Chapter II, Section I. Policies 1, 3, 4, 7 and 8 are addressed above under the applicable conservation and open space policies. Policies 6 and 9 are addressed above under circulation policies. Policy 5 is addressed through the County's Exterior Lighting Criteria, which is applicable to every project within the inland County planning areas. Consistent with Policy 2, the project is conditioned requiring formation of a Homeowners Association, or joining the Las Palmas Ranch Master Association No. 1. Consistent with Policy 11, there is no development proposed on slopes over 30%.
- The project is consistent with the applicable erosion, drainage and flood control policies in LPRSP, Chapter II, Section J. Consistent with Policy 1, a Conceptual Stormwater Control Plan (Gateway Engineering 2017) was developed for the project as part of the preliminary design to address stormwater management for the project site in conformance with County and State regulatory requirements. Consistent

with Policy 3 and 4, the proposed project design includes storm drainage facilities (collection, conveyance, and disposal) as detailed in the stormwater control plan (Gateway Engineering 2017) to meet the generation of stormwater runoff. The project has been conditioned to submit a Storm Water Control Plan (Condition No. 16) prior to the issuance of grading or building permits. Staff will review the plan for compliance with Policies 2, 5, 6 and 7. Consistent with Policy 8, a Geologic Hazards Report and Soil Engineering Feasibility Investigation was prepared for the project (Landset Geotechnical Report) and addresses slope stability of the project area.

- The project is consistent with the applicable public facilities and services policies in LPRSP, Chapter II, Section K. Consistent with Water Policy 1, the River View subdivision will be served by a public utility water company. The applicants obtained a can and will serve letter from California Water Service. Consistent with Water Policy 2, the applicant demonstrated the ability for a public utility water company to provide the subdivision with potable water (see Finding No. 3, Evidence "b"). The Environmental Health Bureau has conditioned the project to be consistent with Water Policy 3 regarding domestic and fire flow water supply, Condition No. 42 and 43. Consistent with Wastewater Policies 1, 2, 3, 4 and 8 the River View subdivision will utilize the existing Las Palmas Wastewater Treatment Plant, operated by California American Water Company (CalAM). The applicants provided a can and will serve letter from CalAM. The Environmental Health Bureau has conditioned the project to be consistent with Wastewater Polices 5, 6 and 10 (Condition Nos. 45 and 46). Consistent with the Fire Protection policy, the project has been reviewed and approved by the Monterey County Regional Fire Protection District.

g) LPRSP Residential Build Out Maximum. LPRSP Chapter II, Section C - Housing & Residential Land Use, Policy 5 limits the maximum number of residential units within the specific plan area to 1,031 in accordance with Figure D and Figure E of the LPRSP. As such, the Project would be restricted by the specific plan residential unit limitation of 1,031. The project includes and amendment to the LPRSP (see Board of Supervisors Resolution XX) which modifies the policy language to increase the residential units to 1,058 resulting results in project consistency with the LPRSP. The proposed amendment to the LPRSP is consistent with the 2010 General Plan and does not create any conflict with existing zoning of the site. Approval of the Vesting Tentative Map and Use Permit is conditioned on the Specific Plan amendment being adopted and going into effect. The proposed amendment is hereby incorporated herein by reference.

h) Allowed Use – Zoning. The subject property is a 15.64 acre, vacant parcel within Las Palmas Subdivision #1, south of River Road and west of Country Park Road, within the LPRSP Area, approximately 1.25 miles west of Spreckels and 0.5 miles east of State Route 68 (SR 68) (Assessor's Parcel Number 139-211-035-000). No address has yet been assigned to the parcel. The zoning classification of the property is Medium Density Residential, 2.61 units per acre, with a Design Control overlay (MDR/2.61-D). Pursuant to Monterey County Code (MCC) section 21.12.050, the MDR zoning district allows for a range of land uses to be approved with a Use Permit. This range of uses includes single-family housing, and other uses of a similar nature, density and intensity. The Project is a residential subdivision with open space parcels and meets the allowed density for the site. Therefore, the Project is consistent with the applicable zoning designation.

i) Lot Legality. The subject property, identified as Parcel Q, is shown on a final map entitled "Amended Map of Las Palmas Ranch Corey House Area/Unit 1" filed June 15, 1989 in the Office of the Recorder of Monterey County, California, in Volume 16 of Cities and Towns, Page 70. Therefore, the County recognizes the subject parcel as a legal lot of record.

j) Review of Development Standards. The project does not include vertical development and the future construction of single family dwellings within the subdivision would be required to meet the development standards for Medium Density Residential zoning district. The design of the subdivision is consistent with applicable policies of the 2010 General Plan, Toro Area Plan and the LPRSP as well as the regulations contained in Title 19 and Title 21. See Finding Nos. 5, 8, 9, 10 ,11 and supporting evidence.

k) Design, Aesthetic Impacts, and Visual Resources. Pursuant to Chapter 21.44, Title 21 (Zoning Ordinance) of the Monterey County Code (MCC), the proposed project site and surrounding area are designated as a Design Control Combining District (D District), which regulates the location, size, configuration, materials, and colors of structures and fences to assure the protection of the public viewshed and neighborhood character. The Project does not include the construction of structures and therefore a Design Approval is not required. The Project does include the removal of approximately 70 eucalyptus trees, some of the trees that would remain are within the critical viewshed as defined in the Toro Area Plan. Although they are not a protected tree species within Monterey County, the trees aid in shielding the potential development from the viewshed of SR 68, River Road, and Las Palmas #1. As demonstrated in Finding No. 5 and supporting evidence, the Project as designed and conditioned, minimizes impacts to visual resources in accordance with applicable visual policies of the General Plan, TAP, LPRSP.

l) Tree Removal. As proposed, the project includes removal of approximately 70 non-native eucalyptus trees. These trees would be replaced with native oak trees and landscaping designed to both

enhance residents' living environment and screen views of the project from neighboring properties and SR 68. Pursuant to MCC section 21.64.260, eucalyptus trees are not identified as a protected species and a permit is not required for removal of the identified trees. However, pursuant to General Plan Policy OS-5.25, the applicant shall complete a pre-construction nesting survey by a qualified biologist to ensure nests of statutorily protected migratory birds and raptors are not disturbed during the breeding season (identified as mitigation measure MM BIO-5 in the FSEIR). The applicant shall also complete a pre-construction survey by a qualified biologist for the protection of bats (identified as mitigation measure MM BIO-4 in the FSEIR). Therefore, the proposed tree removal will not involve a risk of adverse environmental impacts, and implementation of the mitigation measures would ensure consistency with General Plan Policy OS-5.25. These mitigation measures have been incorporated into the project as conditions of approval. See also Finding No. 6 and supporting evidence.

m) Development on Slope Exceeding 25 Percent. As demonstrated in Finding No. 9 and supporting evidence, there is no feasible alternative that would avoid development on slopes exceeding 25 percent.

n) Development Evaluation System. As demonstrated in Finding No. 12 and supporting evidence, the project is consistent with the 2010 Monterey County General Plan Policy LU-1.19.

o) Long-Term Sustainable Water Supply. As demonstrated in Finding No. 11 and supporting evidence, there is a long-term sustainable water supply to serve the Project.

p) Access. Access to the project would be provided from the signalized intersection of River Road and Las Palmas Road to River Run Road, then Woodridge Court, which currently terminates at the project site boundary. River Road is a public road maintained by the County of Monterey. Las Palmas Road, River Run Road, and Woodridge Court are private roads maintained by the Las Palmas Home Owner's Association (LPHOA). The applicant has the necessary access rights to the site via a non-exclusive easement for ingress, egress, road and utilities. The property owner of the site currently pays a monthly road maintenance fee to the LPHOA. Pursuant to a future private agreement between the applicant/owner and the LPHOA, the applicant/owner would pay a proportionate share for the use of the roads based on construction impacts. According to the traffic reports prepared for the project, a separate access would not be necessary to avoid impacts on traffic circulation within the adjacent residential subdivision because the level of service on subdivision roads providing access to the project site would be acceptable. Separate access also would not be necessary to ensure adequate emergency access (see Finding No. 10 and supporting evidence).

q) Proof of Access. Pursuant to MCC Chapter 16.80, Regulations Relating to Applications Involving Use of Private Roads, the project involves intensification of use of a private road. The owner/applicant

is a party to a private road and would access the project site from River Road (a County road) via the following private roads: Las Palmas Road, River Run Road, and Woodridge Court. Based on evidence submitted by the applicant in the form of a Grant Deed (Document No. 2013046807; recorded July 24, 2013), the attached property legal description describes an easement to the subject parcel over these private roads for ingress, egress, road and utilities. MCC section 16.80.030.J defines an easement as a form of "private road agreement" between parties concerning the right to use private property as access to another parcel of private property. Since a legally executed document exists for the private road agreement, the County considers such documentation to be adequate evidence to demonstrate access. Hence, pursuant to MCC section 16.80.030.M, the applicant has demonstrated proof of access to the property via a private road agreement. Pursuant to MCC section 16.80.040.B, the project is classified as a Tier 3 project subject to a private road agreement, but not a private road maintenance agreement. Per MCC section 16.80.030.K, a private road maintenance agreement is an agreement between parties to a private road concerning the costs and responsibilities of those parties for upkeep and repair of the private road; however, no such agreement exists. The project applicant currently pays a monthly road maintenance fee to the LPHOA; however, the parties to the easement or private road agreement concur that this is an informal arrangement.

r) Affordable Housing. As demonstrated in Finding No. 4 and supporting evidence, the project complies with the County's Inclusionary Housing Ordinance.

s) Land Use Advisory Committee Review. The project was referred to the Toro Land Use Advisory Committee (LUAC) for review on October 23, 2023. Several members of the public were in attendance, two of which were concerned with placing a subdivision within existing undeveloped land, disturbing "virgin land" which would have the potential to liberate the Valley Fever virus, and the introduction of additional traffic. The remaining nine members of the public were either in favor of the Project, as opposed to their objection to the senior care facility, had questions regarding road access, if homes would be rentals, or if the CCRs of the HOA would apply to the Project. One LUAC member brought up the prohibition of development on slopes in excess of 25% and another member found that the Project was a great improvement to the previous plan for the assisted living facility. The LUAC supported the project with recommended conditions by a vote of 6 ayes, 0 noes and 2 members absent. The recommended conditions were to: add a 20 foot height limit, replace the removed trees with 1 gallon oaks at a 3:1 ratio, dedicate a scenic easement on all remaining land, obey the LPRSP regarding erosion, slope stability, onsite parking, construction noise control and traffic; add a B-6 overlay; and implement the conditions from the April 27, 2022 letter from Christine Kemp. In response to

public comment, the subject property is zoned for Medium Density Residential development and the Project is an allowed use; the FSEIR did not identify the potential for the Valley Fever virus to be onsite; and as demonstrated in Evidence "u" below and Finding 2, Evidence "d", the project would not result in a significant traffic impact within the subdivision. In response to the LUAC's recommendations, the Project has been conditioned requiring a rezone to add a 20 foot height limit and B-6 overly, conveyance of a conservation scenic easement over areas outside of the approved development and as demonstrated in Evidence "f" above, the project is consistent with the LPRSP. Also see Evidence "t" below regarding the April 2022 Kemp letter.

t) Public Comment. Staff receive a letter from Christine Kemp, dated April 27, 2022, on behalf of the Las Palmas Ranch Master Association No. 1 (see Exhibit I of the March 13, 2024 Planning Commission staff report). The letter states that the association finds that the Project is a preferred alternative to the senior living facility provided that the subdivision have no more than 28 residential lots, there be an 18 foot height limit, a B-6 overly zone be added to prohibit further subdivision and that the areas outside of the development be placed under a scenic easement. The Project meets all these requests except for the 18 foot height limit. There is no evidence in the record that the proposed, and conditioned, 20 foot height limit would result in a significant visual impact or be inconsistent with the General Plan, TAP or LPR SP.

u) California Environmental Quality Act (CEQA). By separate resolution (see Board Resolution No. [XX]), the Board of Supervisors has certified the River View Final Subsequent Environmental Impact Report (FSEIR) as augmented in September 2023. All applicable mitigation measures have been incorporated within the Project as Conditions of Approval. In accordance with Public Resources Code section 21081.6, certification of the FSEIR and approval of the Project includes the adoption of a Mitigation Monitoring and Reporting Plan. Also see Finding 6 and supporting evidence.

v) Process. Title 21 section 21.76.030 states that the appropriate authority for Combined Development Permits shall be the decision making body for the principal land use and subsection B states that the Planning Commission shall act as the recommending body to the Board of Supervisors when said Board is the appropriate authority. Because the Project includes an amendment to the LPRSP the Board of Supervisors is the appropriate authority to decide on the Project as a whole. Consistent with this regulation, the Project was brought before the Planning Commission on March 13, 2024 and their recommendation to the Board of Supervisors is found in Resolution No. [XX].

w) County staff, including the environmental review consultant, conducted numerous site inspections between May 2015 and May

2023 to verify that the project on the subject parcel conforms to the plans listed above.

x) The application, plans, and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development found in HCD-Planning File No. PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

2. FINDING: **SITE SUITABILITY –** The site is physically suitable for the proposed use.

EVIDENCE:

a) The project has been reviewed for site suitability by the following departments and agencies: HCD-Planning, HCD-Environmental Services, HCD-Engineering Services, Monterey County Parks, the Environmental Health Bureau, (EHB), the Monterey County Sheriff's Office, the Monterey County Regional Fire Protection District (Monterey County Regional FPD), and the California Department of Forestry and Fire Protection (CalFire). There has been no indication from these departments/agencies that the site is not suitable for the proposed development. Conditions recommended have been incorporated.

b) Technical reports by outside consultants indicated that there are no physical or environmental constraints that would indicate that the site is not suitable for the use proposed. The following reports have been prepared, and were also used in the preparation of the EIR:

- "Geologic Hazards Report and Soil Engineering Feasibility Investigation" (LIB150359) prepared by LandSet Engineers, Inc., Salinas, California, March 7, 2014
- "Biological Assessment" (LIB150360) prepared by Regan Biological and Horticultural Consulting LLC, Carmel Valley, California, December 15, 2011
- "Biological Assessment Update" (LIB150360) prepared by Regan Biological and Horticultural Consulting LLC, Carmel Valley, California, October 25, 2013
- "Trip Generation Study" (LIB150361) prepared by Hatch Mott MacDonald, Gilroy, California, March 12, 2014
- "Trip Generation Study" (LIB160001) prepared by Hatch Mott MacDonald, Gilroy, California, December 14, 2015
- "Riverview At Las Palmas Residential Subdivision Transportation Impact Analysis" (LIB230291) prepared by Keith Higgins, Gilroy, California, January 19, 2022
- "Biological Assessment for Riverview at Las Palmas Subdivision" (LIB230290) prepared by Pat Regan, Salinas, California, December 3, 2021

County staff independently reviewed these reports and concurs with their conclusions.

c) The Geologic Hazard Report and Soil Engineering Feasibility Investigation (Landset, 2017) states that the project site is a knoll

that rises above River Road with a flat plateau where the residential lot are sited. Future building foundations would be located in geologically suitable portions of the project site in accordance with findings of said report. As illustrated in the attached Vesting Tentative Map, the Project is located within the geologically stable building envelope shown on Sheet 1 of the report.

d) Traffic. The proposed project would result in less-than-significant impacts to area intersections and roadways segments of River Road. The Traffic Impact Analysis (Higgins, December 2022) estimates traffic impacts associated with up to 30 residences would generate approximately 264 daily trips, with 20 AM peak hour trips and 26 PM peak hour trips, which would be at a similar rate to existing residences near the project site. Mitigation measures identified in the FSEIR requiring the payment of traffic impact fees have been incorporated within the project as conditions of approval.

e) County staff, including the environmental review consultant, conducted numerous site inspections between May 2015 and May 2023 to verify that the site is suitable for the proposed use.

f) The application, plans and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

3. FINDING: **HEALTH AND SAFETY –** The establishment, maintenance, or operation of the project will not under the circumstances of this particular case be detrimental to the health, safety, peace, morals, comfort, and general welfare of persons residing or working in the neighborhood of such proposed use, or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County. Necessary public facilities are either available or will be provided.

EVIDENCE: a) The project was reviewed by HCD-Planning, HCD-Environmental Services, HCD-Engineering Services, Monterey County Parks, the Environmental Health Bureau (EHB), the Monterey County Sheriff's Office, the Monterey County Regional Fire Protection District (Monterey County Regional FPD), and the California Department of Forestry and Fire Protection (CalFire). Conditions have been recommended, where appropriate, to ensure that the project will not have an adverse effect on the health, safety, and welfare of persons either residing or working in the neighborhood.

b) Potable Water. Potable water supply is provided to the LPRSP area by the California Water Service Company (Cal Water). The project site is located within Cal Water's Indian Springs/Salinas Hills/Buena Vista service area, and the water provided to this area comes from the Salinas Valley Groundwater Basin. Cal Water has provided a "can and will serve" letter for the proposed project, explaining their

ability and willingness to provide potable water for the previously proposed project. The Project would require less water that the originally proposed senior assisted living facility. Also see Finding No. 8, Evidence "g" and "h" and Finding No. 11 and supporting evidence.

c) Wastewater. The LPRSP area is served by Las Palmas Wastewater Treatment Plants 1 and 2 which are operated by California American Water Company. California American Water Company provided a "can and will serve" letter for the project and in 2017, there was service capacity to treat up to 72,602 gallons per day. As demonstrated in augmented FSEIR, the 30-lot residential subdivision is expected to have a water demand of 5 acre feet per year, or 4,464 gallons per day. Therefore, wastewater service for the Project is within the capacity of California American Water Company. Landscape irrigation on the Project site associated with the subdivision would use reclaimed water from the Las Palmas Ranch Wastewater Treatment Facility and reclaimed water pipe connections to the treatment facility are already located on the Project site.

d) Stormwater. There are several storm drain inlets along the southern side of the property which service the adjacent Las Palmas Ranch subdivision. The project has been reviewed by HCD-Environmental Services who recommended conditions, which have been incorporated, requiring the owner/applicant submit evidence that the Project is covered under the California Construction General Permit, submittal of a final Stormwater Control Report and a Stormwater Control Plan, submittal of an Operation and Maintenance Plan, and enter into a Maintenance Agreement.

e) Wildfire. As demonstrated in Finding No. 10 and supporting evidence, The Project meets applicable regulations for wildfire protections in State Responsibility Areas.

f) The application, plans, and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development found in HCD-Planning File No. PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

4. FINDING: **INCLUSIONARY HOUSING –** The Project, as proposed and conditioned, complies with the Inclusionary Housing Ordinance #5175 (codified at chapter 18.40 of the Monterey County Code).

EVIDENCE: a) Inclusionary Housing Requirement. In accordance with MCC section 18.40.050.A, all residential developments shall contribute to the provision of housing for very low, low and moderate income households in the County. MCC section 18.40.060.A states that residential development consisting of 5 or more units or lots in the County shall provide inclusionary units on-site or off-site. As demonstrated in Finding 1, Evidence "b", the applicant requests to subdivide the property into 27 residential lots and an open space

parcel which would be developed with 27 single-family residences. Therefore, the Project is subject to the Inclusionary Housing Ordinance.

b) Development of On-site Inclusionary Housing Units. The applicant proposes to dedicate four moderate income units onsite as part of the 27 total residential units. These four units make up approximately 15% of the total base units proposed. General Plan Policy LU-2.13 requires 25% of new housing units be affordable with 6% of the units affordable to very low-income households, 6% of the units affordable to low-income households, 8% of the units affordable to moderate-income households and 5% of the units affordable Workforce I income households.

c) In-lieu Fee Amount. An in lieu fee of $401,525.00 will be paid to make up for the other 10% (2.5 units) of the required 25% affordable units requirement. This combination of onsite affordable units and an in lieu fee is proposed due to the economic infeasibility of developing affordable units consistent with the Inclusionary Housing ordinance and General Plan Policy LU-2.13. The in-lieu fee amount, $401,525.00 or $160,610 per unit, is based off the County's Inclusionary Housing Administrative Manual adopted in 2011 under Resolution No. 11-117.

d) Modification of Income Distribution. MCC section 18.40.050.B.2 states development as to which the applicant demonstrates during consideration of a first approval that as a result of unusual or unforeseen circumstances, it would not be appropriate to apply, or would be appropriate to modify, the requirements of this Chapter, provided that the Appropriate Authority who makes the determination to approve or disapprove an exemption or modification makes written findings, based on substantial evidence, supporting that determination. In this particular case, there is evidence to support modifying the distribution type within the subdivision. Due to land and construction costs in the area, and percentage of income allotted to housing by income type, the proposed amount of subsidy would increase by approximately 60% (from $1,081,925 to $1,734,968) in order to provide the necessary housing types based on distribution. The annual maximum percent of income allocated to housing also presents a hardship for home buyers in this case. In order to qualify for very-low income, a household of 4 cannot earn more than 50% of the median income, or $50,200 a year. Of that amount, only 30% of the household income ($15,060) can be allocated to housing. After payment of utilities, HOA fees, insurance and property taxes, very-low income families would only have $5,100 per year (or $425/month) available to pay their mortgage. A low-income household of 4 cannot earn more than 70%, or $70,280 annually and after other housing expenses, those households would only have $10,185 per year, or $848/month available to pay their mortgage. In the LPR SP area, other housing expenses make up more than 50% the income allocation, leaving less of their income to go towards equity and housing upgrades that

would improve their quality of living. In order to qualify for moderate income, a household of 4 cannot earn more than 100% of the median income, or $110,440 a year. Of that amount, 35% of the household income ($38,650) can be allocated to housing. After payment of utilities, HOA fees, insurance and property taxes, moderate income households would have $25,000 per year (or $2,083/month) available to pay their mortgage. Based on these numbers, the disparity between very low/low-income housing allocation and moderate income allocation is drastic, which is an unusual circumstance in this case.

e) LPR SP Amendment. The project includes an amendment to the LPR SP to add new Policy 12 in Chapter II, Section C, specifying that Parcel Q shall require 25% of new housing units as affordable, 15% of which shall be on-site and available to moderate-income households and the remaining 10% shall be provided through payment of an in-lieu fee. Adoption of this amendment provides vertical consistency with the 2010 General Plan (Land Use Policy LU-2.13), the LPR SP, and Monterey County Code Chapter 18.40 - Inclusionary Housing Ordinance of the County of Monterey.

f) The application, plans, and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development are found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

5. FINDING: **VISUAL RESOURCES –** The Project, as proposed and conditioned, is consistent with the applicable visual resource policies contained in the 2010 General Plan (General Plan), Toro Area Plan (TAP), Las Palmas Ranch Specific Plan (LPRSP) and the Monterey County Code (MCC).

EVIDENCE: a) Visually Sensitive Areas. TAP Figure 16 – Toro Area Scenic Highway Corridors and Visual Sensitivity illustrates that western and southern portion of the site is within a "Critical Viewshed" where the eastern and northern portion is within a "Sensitive" area. TAP Policy T-1.5 states that subdivision shall be designed so that new lots have building sites located outside of the critical viewshed. The Vesting Tentative Map illustrates that the residential lots have been clustered and located outside of the critical viewshed consistent with this policy. TAP Policy T-3.1 states that landscaping or new development in areas designated as visually sensitive may be permitted if the location and design is in such a manner that will enhance the scenic value of the area. The Project is similar in siting and density to the Las Palmas Ranch residential neighborhood to the east and south, however, the future single family dwellings of the Riverview subdivision would be subject to a 20 foot maximum height limit, opposed to the 30 foot maximum height limit of Las Palmas #1 and the 30 foot maximum height limit of the Medium Density

Residential zoning district. Therefore, a condition of approval has been applied requiring rezoning of the site to include a 20 foot maximum height limit.

b) Visual Impacts from Scenic Corridors. TAP Figure 16 – Toro Area Scenic Highway Corridors and Visual Sensitivity illustrates that State Route (SR) 68 is an existing designated scenic highway as it provides views of open space, agricultural land, and the Santa Lucia Mountains that border the Salinas Valley. In addition, the figure identifies River Road and Reservation Road as proposed scenic routes. Analysis of the area concludes that the site is visible from a stretch of SR 68 for a distance of approximately 3,000 feet (0.57 miles) but is not visible from the River Road/SR 68 intersection. The site is also visible from portions of Reservation Road, and from within the adjacent residential subdivision. The Project site is adjacent to River Road but is minimally visible due to topography and vegetation. TAP Policy T-3.2 identifies the River Road/SR 68 intersection as a scenic entrance and land use, architectural, and landscaping controls shall be applied, and sensitive site design encouraged and Policy T-3.3 states that except for driveways, pedestrian walkways, and paths, a 100-foot building setback shall be required on all lots adjacent to County and State designated routes to provide open space and landscape buffers. Since the subject property is not visible from SR 68 or the River Road/SR 68 intersection, no additional design considerations (including greater setbacks) were made as these policies do not apply. However, as demonstrated in evidence provided in this finding, the subdivision design, landscaping and exterior lighting, as proposed and conditioned, ensure that the development would not result in a significant visual impact.

c) Las Palmas Ranch Specific Plan Policies. The LPRSP EIR established mitigation measures to reduce aesthetic impacts associated with development of the LPRSP area. Consistent with LPR SP Chapter II, Section F, Policy 11, the mitigation measures require landscape screening, earth-toned building colors, undergrounding of utility and distribution lines, and unobtrusive lighting. Implementation of those mitigation measures would aid in shielding development from the scenic corridor and ensure the future homes and accessory structures will be designed to blend in with the environment. These mitigations have been incorporated as conditions of approval. Future development of the project site is not part of this Project; however, based on the zoning construction of each new home will be subject to a discretionary review by the County to ensure the mitigations approved with this permit are followed in perpetuity. LPR SP Chapter II, Section F, Policy 4 states that open space areas shall be adequately protected from development by placing the area in scenic easements and/or open space zoning. The Project has been conditioned requiring recordation of a Conservation and Scenic Easement consistent with this policy.

d) Exterior Lighting. General Plan Policy LU-1.13 states that all exterior lighting shall be unobtrusive and constructed or located so that only the intended area is illuminated, long range visibility is reduced of the lighting source, and off-site glare is fully controlled. TAP Policy T-3.5 states that exterior/outdoor lighting shall be located, designed, and enforced to minimize light sources and preserve the quality of darkness. Street lighting shall be as unobtrusive as practicable and shall be consistent in intensity throughout the Toro area. As demonstrated in preceding Evidence "c", the Project has been conditioned requiring submittal and approval of an exterior lighting plan.

e) Neighborhood Character. As proposed, the bulk and mass of the proposed structures would not contrast with the neighborhood character. As described above, the Project will eventually be built out with 27 single-family residences similar in design and density to the adjacent Las Palmas Ranch residential neighborhood containing both one and two-story residences as well as a three-story commercial structure (i.e., the Corey House). The scale and massing of the single-family residences would be substantially reduced compared to the originally proposed assisted care living facility. All structures would be in accordance with design guidelines and use appropriate landscaping.

f) Private Views. Concerns were expressed by interested members of the public regarding the previously proposed structures heights of the senior care facility and the impact on private views and privacy of surrounding residences. Private views and privacy are not protected under applicable Monterey County policies or regulations. However, General Plan Policy OS-1.5 states that new subdivisions shall avoid lot configurations which create building sites that will constitute ridgeline development. Siting of new development visible from private viewing areas may be taken into consideration during the subdivision process. As demonstrated in Finding 8, Evidence "m", the Project would not result in ridgeline development. Views within the adjacent residential subdivision are obstructed by existing single-family residences and existing topography. Although private views are not protected, the applicants have considered them when designing their proposal and the added Mitigation Measures will also soften the impact of the development on private views.

g) Aesthetics and Potential Impact on the Environment. As demonstrated in Finding 6 and supporting evidence, the Project would not result in a significant aesthetic impact.

h) The application, plans, and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development are found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

6. FINDING: **CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) –** The Planning Commission, as the recommending body, and the Board of Supervisors, as the decision maker, has reviewed the Draft Subsequent Environmental Impact Report (DSEIR) and the Final Subsequent Environmental Impact Report (FSEIR), as augmented September 2023. By separate resolution, the Board of Supervisors has certified the FSEIR and adopted appropriate CEQA findings, including a Statement of Overriding Considerations. Adoption of the Mitigation Monitoring and Reporting Plan ensures that the Project will not result in a significant impact to the environment.

EVIDENCE:

a) On March 13, 2024, the Planning Commission considered the FSEIR as augmented, recommended certification of the augmented FSEIR and incorporation of mitigation measures as conditions of Project approval.

b) By separate resolution (see Board Resolution No. [XX]), the Board of Supervisors has certified the River View Final Subsequent Environmental Impact Report (FSEIR) as augmented in September 2023. All applicable mitigation measures have been incorporated within the Project as Conditions of Approval. In accordance with Public Resources Code section 21081.6, certification of the FSEIR and approval of the Project includes the adoption of a Mitigation Monitoring and Reporting Plan, an action that is part of this resolution.

c) Implementation of standard conditions of approval and mitigations incorporated by conditions of approval relative to health and safety requires the applicant to enter into a Maintenance Agreement that clearly identifies the responsible party for ongoing maintenance of structural Stormwater Control Measures, prepare an Operations and Maintenance Plan, a Stormwater Control Plan, a Final Improvement Plan (Mitigation Measure AES-3), as well implement Dust Control Measures (Mitigation Measure AQ-1) and reduce construction exhaust emissions (Mitigation Measure AQ-3).

d) The application, plans, and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development are found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

7. FINDING: **NO VIOLATIONS –** The subject property is in compliance with all rules and regulations pertaining to zoning uses, subdivision, and any other applicable provisions of the County's zoning ordinance. No violations exist on the property.

EVIDENCE:

a) Staff reviewed Monterey County HCD-Planning and HCD-Building Services records and is not aware of any violations existing on subject property. Staff conducted multiple site inspections, the most recent one being in May of 2023, no violations were observed on the property.

b) The application, plans, and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development are found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

8. FINDING: **SUBDIVISION** – Section 66474 of the California Government Code (Subdivision Map Act) and Title 19 (Subdivision Ordinance) of the Monterey County Code (MCC) requires that a request for subdivision be denied if any of the following findings are made:

1. That the proposed map is not consistent with the applicable general plan and specific plans.
2. That the design or improvement of the proposed subdivision is not consistent with the applicable general plan and specific plans.
3. That the site is not physically suitable for the type of development.
4. That the site is not physically suitable for the proposed density of development.
5. That the design of the subdivision or the proposed improvements is likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.
6. That the design of the subdivision or type of improvements is likely to cause serious public health problems.
7. That the design of the subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through or use of property within the proposed subdivision.

Based on the whole of the record, and as demonstrated in the evidence below, findings for denial of this subdivision cannot be made in this case.

EVIDENCE: a) Consistency. As demonstrated in Finding Nos. 1 through 12 and supporting evidence, the Project as designed and conditioned is consistent with the 2010 Monterey County General Plan, Toro Area Plan, LPRSP and other County health, safety, and welfare ordinances related to land use development.

b) Subdivision Design – Minimum Lot Size. The minimum lot size is consistent with the Lot Design Standards contained in MCC section 19.10.030. The residential lot sizes vary in area and are between 3,400 square feet and 11,785 square feet, with an average lot size of 5,729 square feet. MCC section 21.12.060.A states that the minimum building site which may be created for Medium Density Residentially zoned lots shall be 6,000 square feet, unless otherwise approved as part of a condominium, planned unit development or similar clustered residential subdivision. Since the proposed subdivision is a planned unit development, the applicants qualify for a reduction in lot size. As demonstrated in Finding 5 and 6 and supporting evidence, the residential subdivision has been clustered to reduce visual impacts and avoid slopes in excess of 25% to the maximum extent feasible. Further, lots are clustered pursuant to

General Plan Policies LU-1.7 and OS-3.6 and the LPRSP. A condition of approval has been applied to require the applicants to rezone the residential parcels to add a B-6 overlay district. MCC section 21.42.030.F states, lots with a B-6 overlay may not be further subdivided or adjusted to reduce the size of the lot as shown on the recorded final map. Therefore, the lot sizes as approved cannot be reduced in the future.

c) Subdivision Design – Lot Width and Depth. The minimum lot width and depth is consistent with the Lot Design Standards contained in MCC section 19.10.030. To maintain consistency with the existing Las Palmas Subdivisions, River View will be designed as a Planned Unit Development which are not required to have an average lot width of 60 feet and a minimum lot depth of 85 feet. The lots have been designed to be consistent with the lots within the existing Las Palmas subdivisions which have widths less than 60 feet.

d) Site Suitability. The site is suitable for the proposed project including the type and density of the development (see Finding No. 2 and supporting evidence).

e) Environment. As demonstrated in Finding No. 6 and supporting evidence, the subdivision design and improvements will not cause environmental damage to fish or wildlife habitat.

f) Health and Safety. The proposed project as designed and conditioned will not, under the circumstances of the particular application, be detrimental to the health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood or to the general welfare of the County (see Finding No. 3 and supporting evidence).

g) Water Supply. MCC section 19.10.070 requires provisions to be made for domestic water supply as may be necessary to protect public health, safety, or welfare, and that the source of supply is adequate and potable. MCC sections 19.03.015.L and 19.07.020.K require Water Supply and Nitrate Loading Information in order to assess these conditions and proof that there is a long-term water supply with the project. The subdivision will receive potable water from the California Water Service Company. The applicants submitted a "can and will serve" letter for the original senior assisted living facility which required more water than the proposed subdivision. The original proposal had an estimated water demand of 11.376 AFY. The maximum of 30 residences that would be constructed under Alternative 3b of the FSEIR would be expected to have a water demand of approximately 5.0 AFY. Also see Finding Nos. 3 and 11 and supporting evidence.

h) Sewage Disposal. Sewage disposal services, in accordance with MCC sections 19.03.015.K and 19.07.020.J would be the same as the originally proposed project. The wastewater collection and treatment system has adequate capacity for sewage disposal, and will be serviced by California American Water company (see Finding No. 3 and supporting evidence).

i) Easements. River Road is a public road maintained by the County of Monterey. Las Palmas Road, River Run Road, and Woodridge Court are private roads maintained by the Las Palmas Home Owner's Association (LPHOA). The applicant has the necessary access rights to the site via a non-exclusive easement for ingress, egress, road and utilities. See Finding No. 1, Evidence "q", regarding Proof of Access. Based on evidence submitted by the applicant in the form of a grant deed (Document No. 2013046807; recorded July 24, 2013), the attached property legal description describes an easement to the subject parcel over these private roads for ingress, egress, road and utilities. The subdivision will not conflict with easements.

j) Traffic. Project design/area relative to access and circulation. A Traffic Impact Analysis was prepared for the Project by Keith Higgins, Traffic Engineer, in December 2022. The Traffic Impact Analysis was revised with a memo in March 2022 to estimate traffic impacts associated with up to 30 residences. The augmented FSEIR analyzed Project traffic impacts under Alternative 3b. Additional but unavoidable traffic would be added to SR 68; approximately 264 trips per day, this number is significantly reduced from the originally proposed project which had an estimated 362 trips per day. The Traffic Impact Analysis and memo are included as Exhibit G, Appendix B of the March 13, 2024 Planning Commission staff report.

k) Affordable Housing. As demonstrated in Finding 4 and supporting evidence, the Project is in compliance with the Monterey County Inclusionary Housing Ordinance.

l) Parks and Recreation. As conditioned, the project has been determined to be in accordance with provisions contained in Title 19 section 19.12.010 - Quimby Act requirements, which requires the subdivider shall dedicate land, pay a fee in lieu thereof, or both, at the option of the County, for park or recreational purposes. Condition No. 23 requires the applicants to either construct a park on the property for the residents of the Homeowners Association to enjoy, or pay an in-lieu fee to the parks department.

m) Ridgeline Development. MCC section 21.06.950 defines "ridgeline development" as "development on the crest of a hill which has the potential to create a silhouette or other substantially adverse impact when viewed from a common public viewing area." The project site is a plateaued area rising above River Road and the adjacent residences. The common public viewing areas that the project would be visible from include short portions of River Road, in close proximity to the site, and a portion of State Route 68, at a distance. Although the site is naturally elevated above its immediate surroundings, the broader surroundings include a range of elevations, with nearby hills of substantially greater elevations, and the project would not result in ridgeline development. As proposed, residential structures would be silhouetted against a mountainous background, not against the sky, when viewed from common public viewing areas. Additionally, project mitigation measures will require

landscape screening and earth-toned building colors to further minimize project visual impacts.

n) Open Space. General Plan Policy LU-2.7 states that open space may be provided in and/or on the fringes of residential development. General Plan Policy LU-8.2 states that clustering, consistent with the other policies of this Plan, shall be considered as a means of maximizing permanent open space within new development. General Plan Policy LU-8.4 states that wherever possible, open space lands provided as part of a development shall be integrated into an area-wide open space network. LPR SP Chapter II, Section F – Conservation and Open Space, Policy 4 states that open space areas shall be placed in scenic easements or adequately protected from development that could destroy the natural amenities of the site. Policy 6 requires a proportionate amount of open space be provided with each increment of housing. Development within the proposed open space parcel is limited to internal roadways, underground utilities, landscaping and parks and/or recreational trails are allowed within the open space parcel. As demonstrated in Finding Nos. 5, 9 and preceding Evidence "b", the residential lots have been clustered allowing open space parcels to surround the subdivision. The project has been conditioned requiring a conservation and scenic easement be conveyed over the open space parcels, which is approximately 12 acres or 77% of Parcel Q.

o) Subdivision Improvements. Although the County's Subdivision Ordinance regulations require specific timing requirements for the installation of subdivision improvements, the FSEIR identified that visual impacts would be reduced to less than significant with implantation of Mitigation Measure AES-3 which requires the applicant submit final improvement plans for review and approval prior to issuance of a grading permit. This mitigation has been incorporated as a condition of approval.

p) The project planner reviewed the application materials, plans, and County GIS records to verify that the proposed project on the subject parcel conforms to the applicable plans and MCC, and will not adversely impact the neighborhood character or scenic/visual resources. County staff, including the environmental review consultant, also conducted numerous site inspections between May 2015 and May 2023 to verify that the proposed project would be consistent with uses and structures in the surrounding area.

q) The application, vesting tentative map, and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development are found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

9. FINDING: DEVELOPMENT ON SLOPES EXCEEDING 25 PERCENT –

There is no feasible alternative which would allow development to occur on slopes of less than 25% and better achieves the goals, policies and objectives of the Monterey County General Plan and applicable area plan than other development alternatives.

EVIDENCE: a) In accordance with the 2010 Monterey County General Plan Policy OS-3.5 and MCC section 21.64.230.A.1, a Use Permit is required and the criteria to grant said permit have been met. LPR SP Chapter II, Section I – Design and Sensitivity, Policy 11 prohibits development on slopes over 30% except where necessary for construction of limited portions of roads or where necessary to maximize goals, objective and policies of the LPR SP and Monterey County General Plan. There is no other feasible location for the proposed development on slopes which includes construction of a new internal roadway with retaining walls to access the subdivision and associated underground water, sewer and electrical utility lines.

b) Due to the topography of the parcel, the subject property is not accessible from Woodridge Court without development on slopes exceeding 25% to allow improvements to the existing access road. The retaining walls and slope stabilization are required to ensure the development does not pose a health and safety risk and/or not cause off-site impacts. According to Monterey County GIS, a small portion of the westernmost roadway and parking area of the subdivision also contains slopes in excess of 25%. Deletion of this roadway area, to avoid the slopes, would create 2 dead end roadways within the subdivision which would potentially conflict with access requirements of the applicable Fire Code (see Finding No. 10 and supporting evidence). Emergency vehicles need adequate space to turn around in the event of an emergency. Parking areas are provided along the roadway which would provide space for emergency vehicles to turn around. In addition, the roadway includes a loop that would allow an emergency vehicle to exit the site without having to turn around. Staff has reviewed the vesting tentative map and visited the site to analyze possible development alternatives. Based on existing site access and topographical limitations for the proposed project, there is no feasible alternative which would allow development to occur on slopes of less than 25%. The clustered lots have been sited and designed to conform to site topography and to minimize grading and other site preparation activities, consistent with applicable policies and regulations.

c) The Geologic Hazards Report and Soil Engineering Feasibility Investigation (LIB150359) prepared for the development of the site, indicates a small portion of the project area contains undocumented manmade fill (soils) and trash fill. Although vertical development is not anticipated at this time, consistency with Title 19 section 19.10.055.B is required. This section states that in areas of eroding slopes and near drainageways, development (building pads and driveways) shall maximize retention of natural landforms such as rolling hills, ridgetops and areas of extensive vegetation and water

courses. Based on the conclusions of the project geologist, future development of these lots would not occur over natural landforms.

d) A Geologic Hazards Report and Soil Engineering Feasibility Investigation (LIB150359) prepared for the development of the site determined that, as proposed, the project would not be subject to, nor increase, any on- or off-site slope stability hazards.

e) The County reviewed the application materials, and site plan to verify that the subdivision minimizes development on slopes exceeding 25% in accordance with the applicable goals and policies of the Monterey County 2010 General Plan and applicable zoning codes. The proposed access road is the minimum necessary to accommodate access to the site as well as access by emergency response vehicles.

f) Pursuant to MCC section 16.08.110, the recommendations included in geological reports shall be incorporated in the grading plans and specifications. Therefore, the applicant must follow all recommendations from the soils engineer.

g) The application, site plans, and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

10. FINDING: **WILDFIRE PROTECTION STANDARDS IN STATE RESPONSIBILITY AREAS** – The Project, as conditioned, will ensure standardized basic emergency access and fire protection, pursuant to Section 4290 of the Public Resource Code.

EVIDENCE: a) The Project site is within the Monterey County State Responsibility Area and would potentially expose people and structures to risk of wildland fire as the future development of the residential lots would be adjacent to undeveloped open space.

b) Monterey County Code Chapter 18.56, Wildfire Protection Standards in State Responsibility Areas, requires that future design and construction of structures, subdivisions and developments in State Responsibility Areas shall provide for emergency access and perimeter wildfire protection measures. The Project, as designed and conditioned, provides for emergency access and fire suppression. Per consultation with California Department of Forestry and Fire Protection (CalFire) and Monterey County Regional Fire Protection District (FPD), the site's proposed emergency evacuation route is sufficient per current State regulations because the length of the site's access road does not exceed the distance that would result in a requirement for secondary ingress/egress. Due to the occupancy type, the site would be subject to Wildland Urban Interface Codes and Standards, which could allow occupants to "shelter in place" in the event of a fire and as determined by the applicable Fire Department based on fire conditions. Per Monterey County Regional

FPD and CalFire, the proposed tree removal would help reduce fuel load and the risk of wildfire. Additionally, the future development would not increase wildfire risk, and would likely improve the firebreak and firefighting protection for the existing residential area of Las Palmas.

c) To the extent practicable, ingress and egress for the subdivision meets the regulations regarding road standards for fire equipment access adopted pursuant to Section 4290 of the Public Resources Code and any applicable local ordinance.

d) The project is consistent with Chapter 18.56 of the Monterey County Code, to the extent applicable. In 1992, the Monterey County Board of Supervisors adopted Ordinance No. 3600, enacting Chapter 18.56 of the Monterey County Code, to implement Public Resources Code sections 4117 and 4290. The purpose of the ordinance is to establish wildfire protection standards in conjunction with building, construction, and development in State Responsibility Areas (SRAs) within the unincorporated area of the County and within the "direct fire protection authority of the California Department of Forestry" (MCC section 18.56.010.A). These standards require that future design and construction of development in SRAs provide for emergency access and perimeter wildfire protection measures. Chapter 18.56 was added to Title 18 of the Monterey County Code where it has remained since 1992. In 1992, the Board of Forestry and Fire Protection (the Board of Forestry) certified the Ordinance.

e) The conceptual landscape plan submitted by the applicant and analyzed during environmental review provides for maintained and irrigated defensible space around the proposed structures.

f) During project review, applicable agencies and departments have reviewed the proposed development to ensure the following: 1) all driveways meet minimum requirements regarding width, surface, grade, and turning radius or turnaround; 2) maintenance of adequate defensible space around all structures; and 3) all structures will have adequate fire protection equipment [sprinkler systems], fire alarms systems, and roof construction.

g) The application, site plans, and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

11. FINDING: **LONG-TERM SUSTAINABLE WATER SUPPLY AND ADEQUATE WATER SUPPLY SYSTEM –** The Project location has a long-term, sustainable water supply, both in quality and quantity, and an adequate water supply system to serve the development as required by General Plan Policies PS-3.1 and PS-3.2, respectively.

EVIDENCE:

a) The proposed subdivision will require the use of potable water. The existing water use is negligible, and the baseline condition identified in the River View FSEIR was considered to be zero. As analyzed in the augmented FSEIR, Alternative 3b (up to 30-lot subdivision), when fully built out with single-family residences would have an estimated water demand of approximately 5 acre feet of water per year.

b) The Project's water supply would be provided by the California Water Service Company (CWS). The Project site is located within CWS's Indian Springs/Salinas Hills/Buena Vista service area, and CWS would provide potable water to the site from wells located in the Salinas Valley groundwater basin. The CWS wells and the Project site are located in the Monterey County Water Resources Agency benefit assessment Zone 2C, and the project applicant/owner has been paying the Zone 2C assessment. Landscape irrigation on the project site associated with the proposed project would use reclaimed water from the Las Palmas Ranch Wastewater Treatment Facility, operated by California American Water.

c) CWS as the water provider is a regulated public utility which is mandated to provide water that meets public health standards and thus has adequate water quality as required by PS-3.2(a).

d) Potable water would be provided by CWS via its entitlements detailed in the Augmented Final SEIR, incorporated herein by reference. This satisfies the criteria in PS-3.2(b), which points to the authorized production capacity of a facility operating pursuant to a permit from a regulatory agency. CWS projected that, under all hydrologic conditions, its groundwater supply for the Salinas District will fully meet future demands through 2040. CWS has also provided a "can and will serve" letter for the proposed project that indicates the applicable water purveyor for the site is able to provide water supply for the proposed project based on its existing facilities.

e) CWS has the technical, managerial, and financial capability to provide water to the subject site consistent with PS-3.2(c). CWS has a proven record and has demonstrated its technical, managerial and financial capabilities to deliver water.

f) PS-3.2(d) requires consideration to the rights to water from the source. In this case, CWS's Urban Water Management Plan (UWMP), which is incorporated by reference in the Augmented Final SEIR and herein by reference, provides detailed information on the Salinas District's historical and projected water demands, water supplies, supply reliability and vulnerabilities, water shortage contingency planning, and demand management programs, including water conservation planning. The Augmented Final SEIR sufficiently analyzed water supply availability and reliability. As stated above, CWS projected that its groundwater supply for the Salinas District will fully meet future demands through 2040 under all hydrologic conditions.

g) General Plan Policy PS-3.2(e) and (g) state:

e. *Cumulative impacts of existing and projected future demand for water from the source, and the ability to reverse trends contributing to an overdraft condition or otherwise affecting supply; and to those resources and species.*

g. Completion and operation of new projects, or implementation of best practices, to renew or sustain aquifer or basin functions.

Although the Salinas Valley Groundwater Basin is currently in overdraft, actions taken by both CWS and Monterey County Water Resources Agency (MCWRA), including conservation, system improvements, and future projects are projected to continue to provide for a reliable water supply. Relevant efforts include the Salinas Valley Water Project, Conservation Master Plan, and Greater Monterey County Integrated Regional Water Management Program. Additional detail of these efforts in provided in the Draft SEIR and Augmented Final SEIR, and is incorporated herein by reference.

h) Substantial evidence related to proof of a suitable water supply for the project is provided in the following documents, which are incorporated herein by reference:
- Analysis and references in the Draft SEIR and Augmented Final SEIR, including Section 10.0, *Water Supply*;
- California Water Service's "can and will serve" letter included in Draft SEIR Appendix E;
- California Water Service's *updated* will-serve letter included in Final SEIR Appendix I-2; and
- Discussion and analysis in responses to comments and Final SEIR.

i) The Las Palmas Ranch Specific Plan FEIR estimated total water demand for the Specific Plan area to be 922 AFY. When proposed, the specific plan included 1,578 housing units, which was evaluated in the specific plan EIR. However, the County ultimately approved only 1,031 housing units, approximately sixty-five percent of the original number. Sixty-five percent of 922 AFY would result in a corresponding water demand of approximately 599 AFY. Actual water use for the specific plan area is estimated at approximately 182 AFY. Therefore, the total water use (182 + 5 = 187 AFY) would be approximately 412 AFY less than the County approved in 1983 for the specific plan area. The 182 AFY estimate of actual water use is based on the amount of wastewater flow as described in the Final SEIR.

j) The proposed subdivision is within benefit assessment Zone 2C of the Monterey County Water Resources Agency which provides funding for water projects that address seawater intrusion in the Salinas Valley groundwater basin. The property owners have been paying annual assessments to receive benefits associated with water projects that improve water supply and water quality. The Final Augmented SEIR states the proposed subdivision will have less of a water demand than the originally proposed Senior Assisted Living Facility.

k) Sustainable Groundwater Management Act of 2014 (SGMA). The State of California passed legislation in 2014 to provide for the sustainable management of basins at a local level by providing local agencies with the authority, and with technical and financial assistance, to sustainably manage groundwater. SGMA uses California Groundwater Bulletin 118 (2020 Update) to determine a category for each groundwater basin. Cal Water extracts groundwater from two hydraulically connected sub-basins of the groundwater basin known as the Pressure Subarea and the East Side Subarea. The Pressure Area is a region of gradually declining groundwater elevations and is characterized by three confined aquifer systems, overlain and separated by thick clay layers that act as aquicludes. These aquifers named for their relative depths are known as the "180-foot", the "400-foot", and "900-foot" aquifers. The groundwater level in the East Side Area is declining more rapidly than any other area in the groundwater basin. The East Side Area is comprised of unconfined, randomly scattered water bearing strata. The State has designated the 180-foot and 400-foot aquifers as critically over-drafted. The SGMA requires that aquifers identified as being in critical overdraft have Groundwater Sustainability Plans (GSPs) adopted by 2020 and that improvements/actions required by that plan be operational by 2040. The Act also requires that aquifers identified as a Medium or High Priority Basin, but not in critical overdraft, have Groundwater Sustainability Plans adopted by 2022 and that improvements/actions required by that plan be operational by 2042. The groundwater basin is identified as a High Priority Basin, and the 180-foot and 400-foot aquifers of the Pressure Subarea and the East Side Subarea sub-basins are identified as in critical overdraft. Therefore, a plan was adopted by 2020 and actions to bring the basin into a sustainable state, as defined in the local GSP, must be operational by 2040. A Groundwater Sustainability Agency, the Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA), was formed in 2017 for the area within which the project is located. The SVBGSA is charged with achieving groundwater sustainability through the development and implementation of Groundwater Sustainability Plans (GSPs) under this Act. The SVBGSA has been preparing GSPs for this area to meet its legislative mandate to bring the basin into balance and to have the GSP adopted for the Pressure Subarea and the East Side Subarea sub-basin areas by 2020. In January 2020, the Salinas Valley Basin Groundwater Sustainability Agency adopted a Groundwater Sustainability Plan for the 180/400 aquifer sub-basin. See Section 10.0 of the DSEIR, and Section 4 of the FSEIR, for related discussions.

l) Regarding the General Plan requirement for MCWRA consultation to determine long-term, sustainable water supply (GP Policy PS-3.2) and the role of Monterey County Housing and Community Development HCD), in March 2019 the MCWRA and HCD executed a Memorandum of Understanding (MOU) for development

services. Per the MOU, the performance of and responsibility for analysis of long-term, sustainable water supply pursuant to General Plan Policy PS-3.2 on discretionary projects was assumed by HCD, which has the expertise of a Senior Hydrologist. Additionally, HCD did consult with the MCWRA.

m) The application, site plans, and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

12. FINDING: **DEVELOPMENT EVALUATION SYSTEM /MONTEREY COUNTY 2010 GENERAL PLAN POLICY LU-1.19** – The project, as proposed and conditioned, is consistent with Policy LU-1.19 of the 2010 General Plan.

EVIDENCE: a) The project is outside of a Community Area, Rural Center or official Affordable Housing Overlay and is thus subject to Policy LU-1.19. While the project is being considered in advance of adoption of the Development Evaluation System (DES), the County applies the criteria in Policy LU-1.19 to projects as applicable, pending adoption of the Development Evaluation System. Based on the specific facts associated with this application, it is determined that the project meets the evaluation criteria set forth in Policy LU-1.19 and would pass the DES. Policy LU-1.19 states:

"*Community Areas, Rural Centers and Affordable Housing Overlay districts are the top priority for development in the unincorporated areas of the County. Outside of those areas, a Development Evaluation System shall be established to provide a systematic, consistent, predictable, and quantitative method for decision-makers to evaluate developments of five or more lots or units and developments of equivalent or greater traffic, water, or wastewater intensity. The system shall be a pass-fail system and shall include a mechanism to quantitatively evaluate development in light of the policies of the General Plan and the implementing regulations, resources and infrastructure, and the overall quality of the development. Evaluation criteria shall include but are not limited to:*

a) Site Suitability
b) Infrastructure
c) Resource Management
d) Proximity to a City, Community Area, or Rural Center Mix/Balance of uses including Affordable Housing consistent with the County Affordable/Workforce Housing Incentive Program adopted pursuant to the Monterey County Housing Element
e) Environmental Impacts and Potential Mitigation
f) Proximity to multiple modes of transportation

g) Jobs-Housing balance within the community and between the community and surrounding areas
h) Minimum passing score

Residential development shall incorporate the following minimum requirements for developments in Rural Centers prior to the preparation of an Infrastructure and Financing Study, or outside of a Community Area or Rural Center:
1) 35% affordable/Workforce housing (25% inclusionary; 10% Workforce) for projects of five or more units to be considered.
2) If the project is designed with at least 15% farmworker inclusionary housing, the minimum requirement may be reduced to 30% total.
This Development Evaluation System shall be established within 12 months of adopting this General Plan."

Policy LU-1.19 seeks to direct development to locations designated for development (Community Areas, Rural Centers and Affordable Housing Overlay districts). The subject parcel is designated for Medium Density Residential development which is one of the higher intensity residential land uses within the County. The site is suitable for the development proposed, and the Medium Density Residential zoning district allows single-family residences and other uses of a similar nature and intensity subject to a Use Permit. As noted in Finding No. 1, Evidence "b" above, the proposed development on the site is consistent with the land use and zoning. Also, the proposed use is considered compatible with residential uses.

b) Infrastructure exists to the project site in the adjacent roadways and has the capacity to support the level of development proposed. No new infrastructure will need to be extended to the site, so the project will not encourage growth on parcels currently lacking utility connections.

c) The site is not located in a Community area, Rural Center, or City; however, it is immediately adjacent to the largest of the Las Palmas Ranch residential areas, and is approximately 1.95 miles from the River Road Rural Center (Figure #RC5 of the 2010 General Plan).

d) Public services that will be needed by residents of the proposed project are sufficient and located adequately. The project is expected to have less than significant impacts on public services such as police, fire, library, and medical services due to the nature of the project, and the existing services available within a serviceable distance.

e) The application, site plans, and supporting materials submitted by the project applicant to Monterey County HCD-Planning for the proposed development found in Project File PLN150372, including Board of Supervisors Resolution No. [XX] approving the LPR SP amendment and the Board of Supervisors Resolution No. [XX] certifying the FSEIR and adopting a Statement of Overriding Considerations.

DECISION

NOW, THEREFORE BE IT RESOLVED, based on the above findings and evidence and the administrative record, that the Board of Supervisors:
Approves a Combined Development Permit consisting of:

1. a Vesting Tentative Map to create 27 residential lots, including four moderate income units, and an open space parcel;
2. a Use Permit to allow development on slopes in excess of 25% for subdivision improvements;
3. Adopt a Mitigation Monitoring and Reporting Plan.

Said decision is to be in substantial conformance with the attached plan and subject to the attached conditions where are incorporated herein by reference.

PASSED AND ADOPTED upon motion of Supervisor _____, seconded by Supervisor _____, and carried this [DATE], by the following vote to wit:

AYES:
NOES:
ABSENT:
ABSTAIN:

I, Valerie Ralph, Clerk of the Board of Supervisors of the County of Monterey, State of California, hereby certify that the foregoing is a true copy of an original order of said Board of Supervisors duly made and entered in the minutes thereof Minute Book _____ for the meeting on [DATE].

Date:
File Number:

Valerie Ralph, Clerk of the Board of Supervisors
County of Monterey, State of California

By_____
Deputy

This decision, if this is the final administrative decision, is subject to judicial review pursuant to California Code of Civil Procedure Sections 1094.5 and 1094.6. Any Petition for Writ of Mandate must be filed with the Court no later than the 90th day following the date on which this decision becomes final.

NOTES

1. You will need a building permit and must comply with the Monterey County Building Ordinance in every respect.

Additionally, the Zoning Ordinance provides that no building permit shall be issued, nor any use conducted, otherwise than in accordance with the conditions and terms of the permit granted or until ten days after the mailing of notice of the granting of the permit by the appropriate authority, or after granting of the permit by the Board of Supervisors in the event of appeal.

Do not start any construction or occupy any building until you have obtained the necessary permits and use clearances from Monterey County HCD- Planning and HCD- Building Services Department office in Salinas.

2. This permit expires 3 years after the above date of granting thereof unless construction or use is started within this period.

Form Rev. 1-27-2021

Exhibit C

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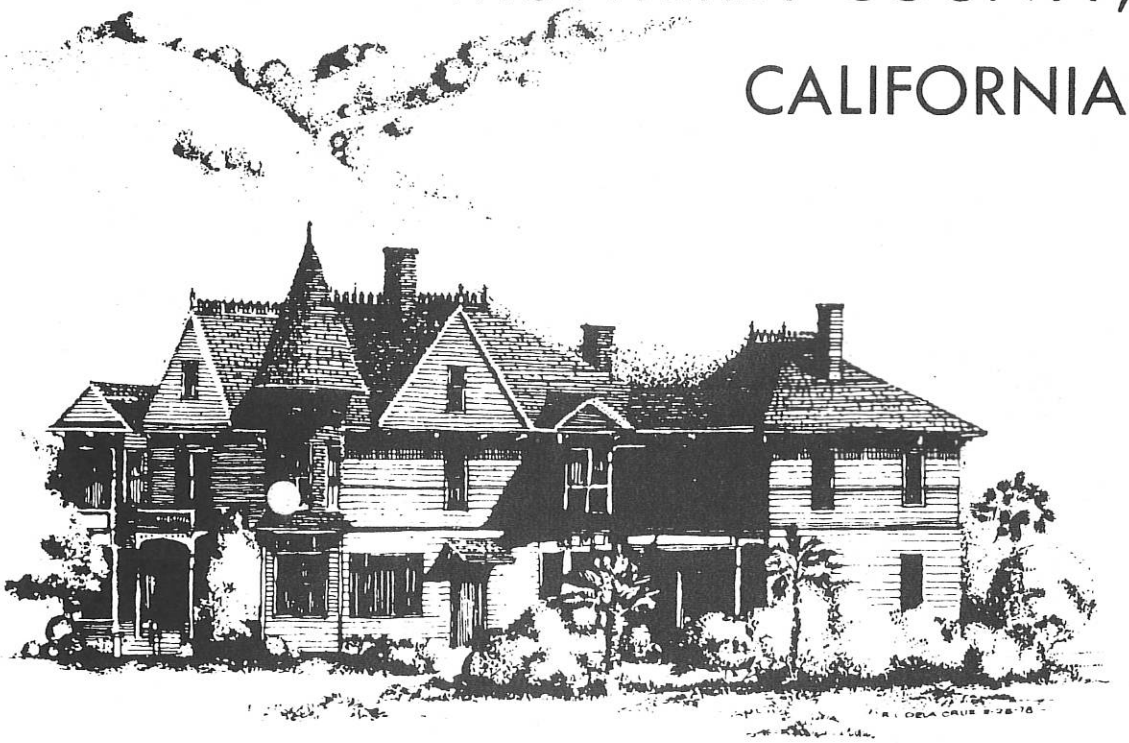
LAS PALMAS RANCH SPECIFIC PLAN

MONTEREY COUNTY, CALIFORNIA



SEPTEMBER, 1983

MONTEREY COUNTY BOARD OF SUPERVISORS

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CONSULTANT TO MONTEREY COUNTY

Donald R. Crawford

LAS PALMAS RANCH CONSULTANTS

Alden W. Barstad, AIA, & Assoc., Inc., Planner-Architect
Cooper & Clark Consulting Engineers, Geotechnical
Wilsey & Ham, Civil Engineers
Engineering-Science, Environmental Engineers
Harry H. Tsugawa, Landscape Architect
Community Housing Improvement System and Planning Association, Low and Moderate Income Housing
Leblanc & Company, Economics
Brian Finegan, Legal
Brandon & Tibbs, Accountants, Accounting & Finance

Adopted by the Monterey County Planning Commission
April 15, 1983

Adopted by the Monterey County Board of Supervisors
September 20, 1983

INDEX

I INTRODUCTION

A. Format and Content of this Specific Plan

B. Nature and Purpose of the Plan

C. Statutes

D. Existing Conditions

II LAS PALMAS RANCH SPECIFIC PLAN

A. Introduction

1. The Value of Goals

2. The Function of Policies

B. Phasing of Development

C. Housing and Residential Land Use

D. Commercial Land Use

E. Circulation

F. Conservation and Open Space

G. Energy Conservation

H. Preservation of Significant Agricultural Land

I. Design and Sensitivity

J. Erosion, Drainage and Flood Control

K. Public Facilities and Services

1. Water

2. Wastewater

3. Schools

4. Fire Protection

5. Police Protection

III **THE REGULATORY FUNCTION**

A. CEQA Compliance

B. Zoning

1. Interim Zoning

2. Ultimate Zoning

C. Use Permits

D. Subdivision

E. Conditions of Approval

F. Modifications to Plan

IV **NONREGULATOR Y IMPLEMENTATION**

A. Assessment and Service District Policies

B. Homeowners' Association Policies

APPENDIX A - River Road Area of Development Concentration General Plan Amendment

GRAPHICS INDEX

FIGURE	TITLE	OPPOSITE PAGE
A	Aerial View Showing Monterey Bay	Following Index
B	Vicinity Map	1-1
C	Schematic Slopes Map	1-4
D	Las Palmas Ranch Specific Plan Land Use Table	1-6
E	Specific Plan Land Use Map	II-1
F	Corey House Restoration	II-6
G	1980 Traffic Volumes - Directional Split Data	II-7
H	Frontal Slopes Map	II-12
I	Erosion and Drainage Control Concepts	II-18
J	Erosion and Drainage Control Concepts	II-19
K	Conceptual Cross Sections, Neighborhood Open Spaces	II-20

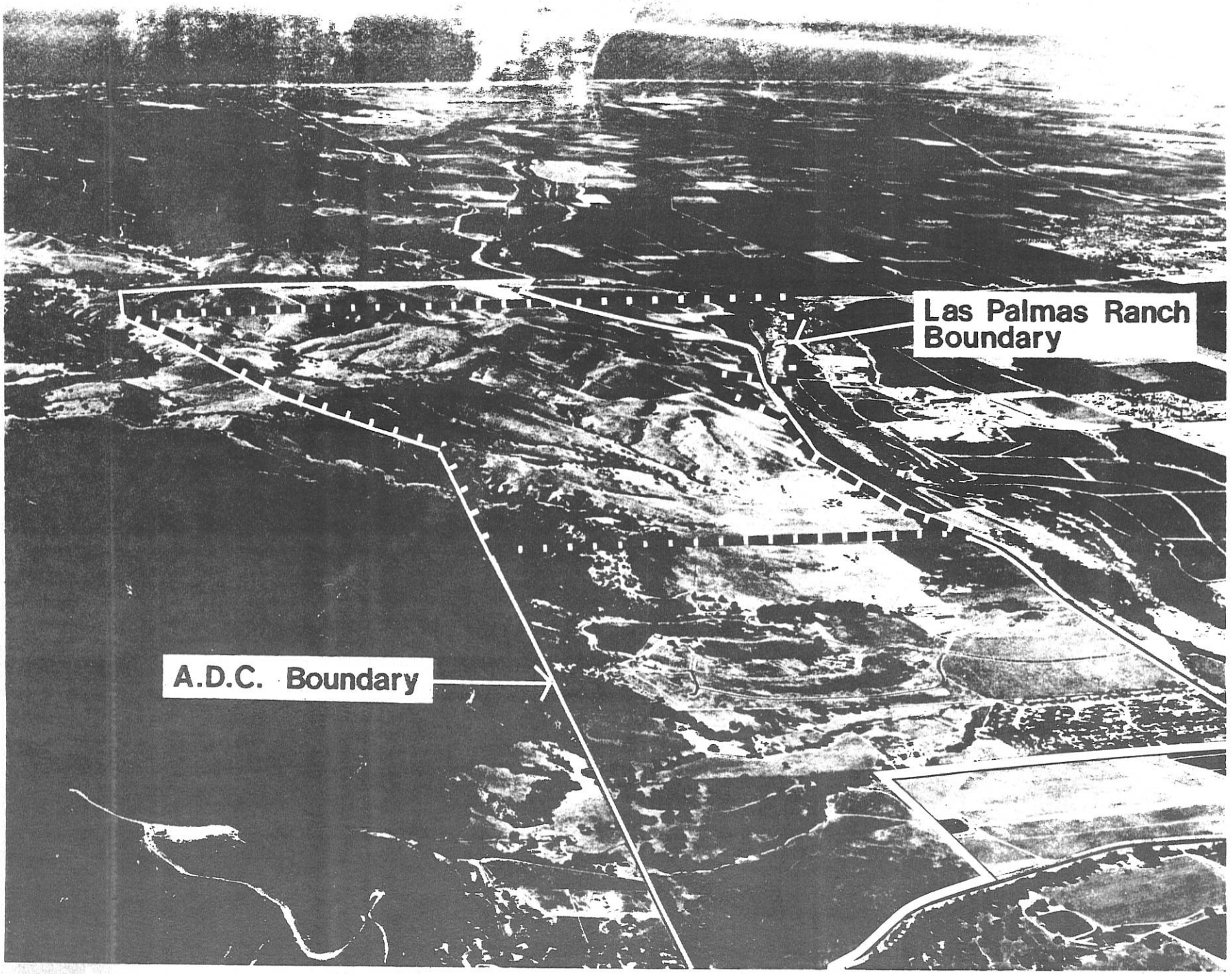


FIGURE A AERIAL VIEW SHOWING MONTEREY BAY

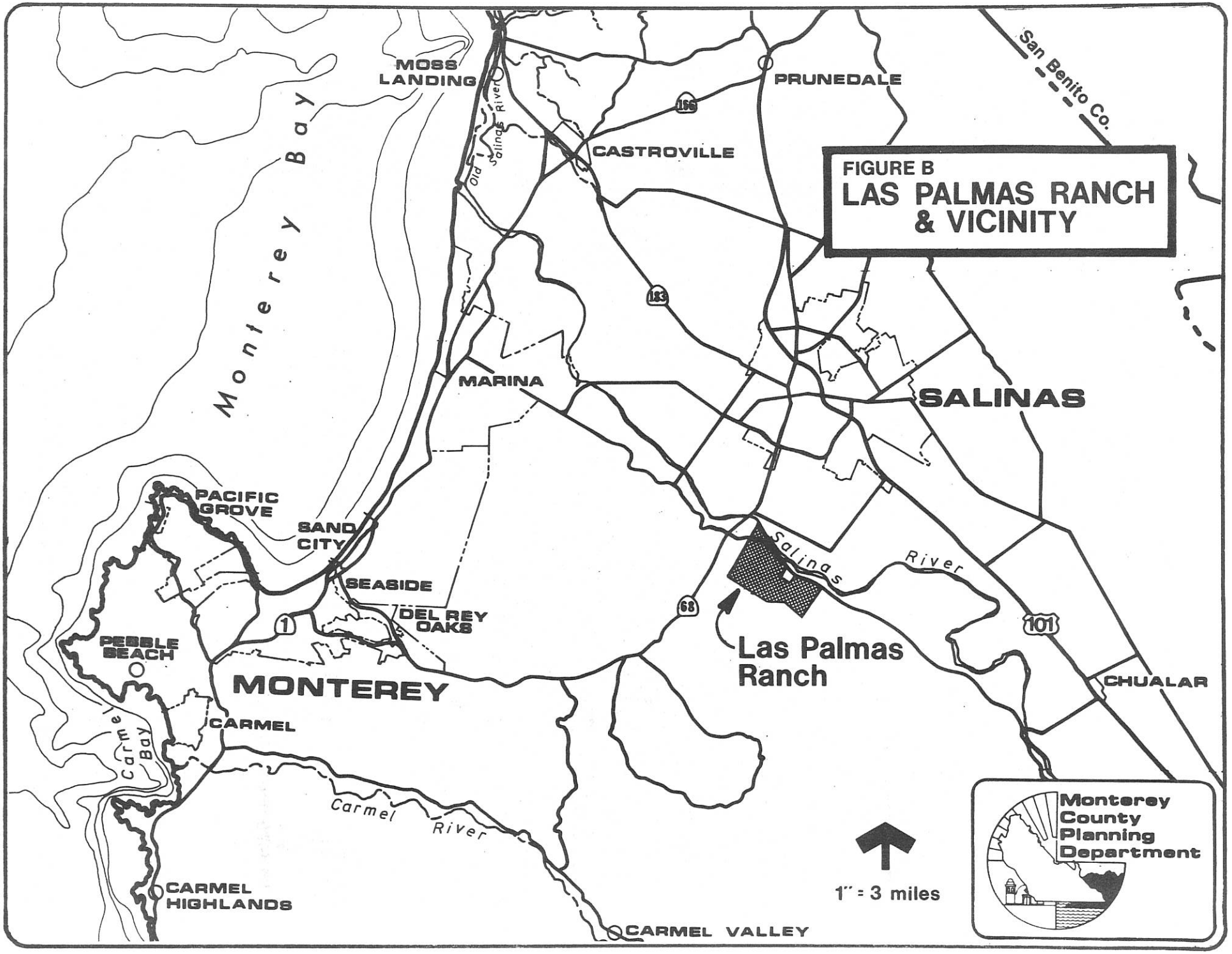


FIGURE B
LAS PALMAS RANCH
& VICINITY
MOSS LANDING
Monterey Bay
Old Salinas River
PRUNEDALE
San Benito Co.
CASTROVILLE
MARINA
SALINAS
PACIFIC GROVE
SAND CITY
SEASIDE
DEL REY OAKS
PEBBLE BEACH
MONTEREY
CARMEL
Carmel Bay
Carmel River
CARMEL HIGHLANDS
CARMEL VALLEY
Salinas River
Las Palmas Ranch
CHUALAR
1" = 3 miles
Monterey County Planning Department

CHAPTER I
INTRODUCTION TO THE SPECIFIC PLAN

A. FORMAT AND CONTENT OF THIS SPECIFIC PLAN

This Las Palmas Ranch Specific Plan is presented in four parts, including this introductory chapter.

Chapter II presents the Las Palmas Ranch Specific Plan.

Chapter III explains the regulatory process that must be undertaken in order for the developer and the County to implement this Specific Plan. This chapter also describes any changes required in the ADC criteria and in county ordinances in order to implement this Specific Plan.

Non-regulatory elements of plan implementation are described in Chapter IV. While local government is not always directly concerned with the action of the private sector, these elements will have an important affect on overall progress toward building Las Palmas Ranch and on the timing and phasing of both public and private decisions.

B. NATURE AND PURPOSE OF THE PLAN

The Las Palmas Ranch Specific Plan serves as the primary instrument for securing approval of the County of Monterey to carry out semi-rural development proposals of the Las Palmas Ranch Partnership under the Monterey County General Plan.

The implementation of the Las Palmas Ranch Specific Plan calls for the application of design, phasing, financing and regulatory techniques which have emerged from the creation of other successful community developments throughout the State and country. The Las Palmas Ranch Partnership and the County of Monterey must each play an important role in achieving the gradual transition of a controlled amount of land to a development status while maintaining the integrity of adjacent lands where intensified development is not called for in the General Plan. There is a variety of tools which enable local government to monitor the development process; including relevant state statutes, the Monterey County General Plan, and local ordinances. This Specific Plan provides an additional tool.

The Specific Plan has several functions:

1. The Specific Plan presents the goals of the developer.

2. The Specific Plan describes and illustrates design and construction concepts for the Las Palmas Ranch which are consistent with policies of the General Plan.

3. The Specific Plan sets forth the procedures which will be utilized by the County to implement these policies and concepts.

4. The Specific Plan describes various non-regulatory tools of implementation which are needed to achieve the goals of the developer and the County.

This Specific Plan for Las Palmas Ranch provides a unique opportunity to devise a development scheme which reflects a more rational and human scale to semi-rural living than generally has resulted from the local planning process in California. The development of Las Palmas Ranch is, to some extent, then, a bold challenge to the creativity of local government and the developer to respond to the needs of the community through a productive team effort.

The River Road ADC boundaries are Pine Canyon Road on the east, River Road on the north, Highway 68 on the west and Toro Regional Park on the south, but excludes the St. John's College and Marks properties. The ADC includes other land than the Las Palmas Property, but does not include that portion of the Las Palmas Ranch located on the north side of River Road.

C. STATUTES

The Las Palmas Specific Plan has been prepared under the authority of the following sections of the California Government Code:

> Section *65450*. The planning agency may, or if so directed by the legislative body shall, prepare specific plans based on the General Plan and drafts of such regulations, programs and legislation as may in its judgment be required for the systematic execution of the general plan and the planning agencies may recommend such plans and measures to the legislative body for adoption.
>
> Section *65450.1*. A specific plan need not apply to the entire area covered by the general plan. The legislative body or the planning agency may designate areas within a city or a county for which the development of a specific plan will be necessary or convenient to the implementation of the general plan. The planning agency may, or if so directed by the legislative body shall, prepare specific plans for such areas and recommend such plans to the legislative body for adoption.
>
> Section 65451. Such specific plans shall include all detailed regulations, conditions, programs and proposed legislation which shall be necessary or convenient for the systematic implementation of each element of the general plan listed in Section 65302, including, but not limited to, regulations, conditions, programs and proposed legislation in regard to the following:

(a) The location of housing, business, industry, open space, agriculture, recreation facilities, educational facilities, churches and related religious facilities, public buildings and grounds, solid and liquid waste disposal facilities, together with regulations establishing height, bulk and setback limits for such buildings and facilities, including the location of areas, such as flood plains or excessively steep or unstable terrain, where no building will be permitted in the absence of adequate precautionary measures being taken to reduce the level of risk to that comparable with adjoining and surrounding areas.

(b) The location and extent of existing or proposed streets and roads, their names or numbers, the tentative proposed widths with reference to prospective standards for their construction and maintenance, and the location and standards of construction, maintenance and use of all other transportation facilities, whether public or private.

(c) Standards for population density and building density, including lot size, permissible types of construction, and provisions for water supply, sewage disposal, storm water drainage and the disposal of solid waste.

(d) Standards for the conservation, development, and utilization of natural resources, including underground and surface waters, forests, vegetation and soils, rivers, creeks, and streams, and fish and wildlife resources. Such standards shall include, where applicable, procedures for flood control, for prevention and control of pollution of rivers, streams, creeks, and other waters, regulation of land use in stream channels and other areas which may have a significant effect on fish, wildlife and other natural resources of the area, the prevention, control and correction of soil erosion caused by subdivision roads or any other sources, and the protection of watershed areas.

(e) The implementation of all applicable provisions of the open-space element as provided in Article *10.5* (commencing with Section *65560)* of this chapter.

(f) Such other measures as may be necessary or convenient to insure the execution of the general plan.

In the last few years, there have been a number of amendments to various other sections of State Codes which are relevant to the purposes of the Specific Plan. These include:

Government Code Section 65860(a). County or city zoning ordinances shall be consistent with the general plan of the county or city by June 30, 1973.

Business and Professions Code Section 11526(c). No city or county shall approve a tentative or final subdivision map unless the governing body shall find that the proposed subdivision together with the provisions for its design and improvement, is consistent with applicable general or specific plans of the city or county.

D. EXISTING CONDITIONS

The environmental setting of the Las Palmas Ranch property was initially described in the report Las Palmas Ranch Environmental Resources Inventory, completed in 1978 and accepted by the Planning Commission and the Board of Supervisors in January of 1979. That inventory is incorporated herein by reference; however, portions are repeated below in order to provide background information on the site as it exists.

The site is comprised of approximately 1578 acres, fronting on River Road approximately one-half mile to the east of the intersection of River Road and State Highway 68 and continuing east for approximately two miles.

It is irregular in shape and topography. Ground level varies from approximately 40 feet mean sea level (MSL) to 700 feet MSL. General slopes are moderate although there are a few steep canyons.

SLOPE ANALYSIS OF LAS PALMAS RANCH

Slope Category	Acreage	Percentage of Total Acreage
0-10%	280	18
11-20%	488	31
21-30%	326	21
30%+	481	30

The site is essentially vacant and is used primarily for grazing. Row crops are farmed on a small portion of the Ranch north and south of River Road and bordering the Salinas River. This land will remain substantially in agricultural use.

The land surrounding the Las Palmas site is primarily in residential use. Beyond the western border lies vacant land, the former Ferrini Ranch, now approved for residential development in accordance with the Toro Vista Specific Plan, adopted December 16, 1980. Further west, across Highway 68, are residential developments: Serra Village, Toro Creek Estates, Toro Sunshine, Toro Park Estates and Creekside. These developments range in density from four to seven dwelling units per acre. On the eastern boundary is Vista Del Rio, a residential development of eighty one-acre lots. Other properties to the east include the Indian Springs Ranch Subdivision, a clustered development at an overall density of one unit per acre, and the Pedrazzi Subdivision, a standard subdivision of ninety-five homes on lots average one-third acre in size. Directly across the Salinas River, to the north, is the Spreckels sugar plant complex and the town of Spreckels. On the south border is Toro Regional Park.

Although the seismic safety element indicates the possibility of an inferred fault, referred to as the King City (Reliz-Rinconada) fault, in the vicinity of Las Palmas Ranch, extensive exploration by geologists Cooper &: Clark (Geotechnical Evaluation November 19, 1980 and Fault Evaluation May 20, 1981) have verified that there is no evidence to support existence of that fault on Las Palmas Ranch property.

A series of natural drainage courses traverse the property in a northeasterly direction. These serve relatively small drainage areas which originate from within the property boundaries. Most of the soils in these areas have moderate to high permeability, and most of the storm run-off percolates into the groundwater basin before reaching River Road. Such drainage conditions do not appear to present any danger to the areas proposed for development. The exception is the portion of the property lying northeast of River Road, not proposed for housing, which lies within the one hundred year flood line as suggested by the U.S. Corps of Engineers.

The area is blessed with a Mediterranean type climate: mild year-round temperatures, temperate winters and an average rainfall ranging from thirteen inches at River Road to fifteen inches at the upper elevations of the site.

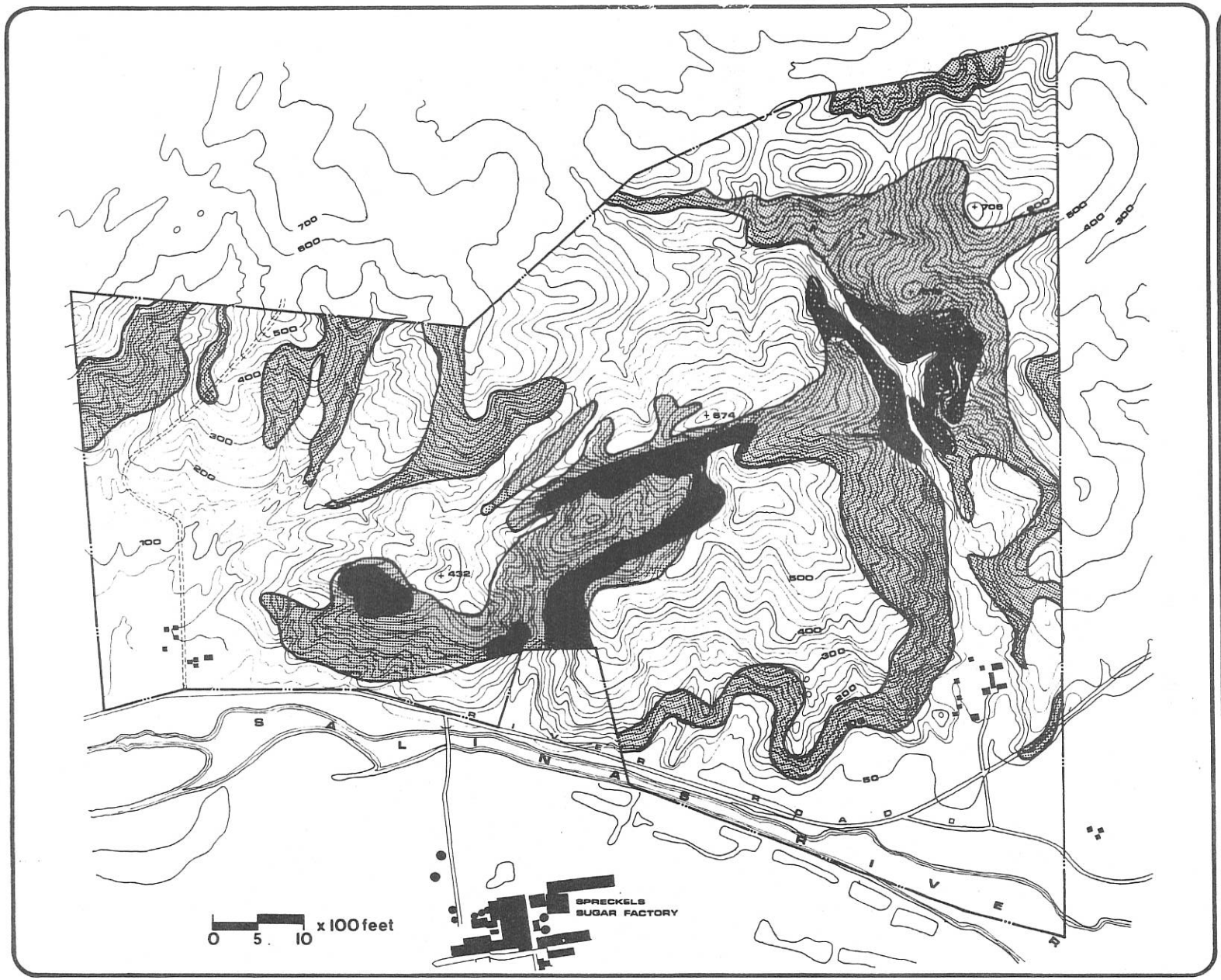
Currently, three wells are supplying water to the property; one produces approximately 1,650 gallons per minute of water of excellent quality. According to the State Water Resources Control Board Reports the surface and groundwater quality of the Salinas River Sub-Basin is suitable for all water uses.

Air quality reports by the Air Pollution Control District indicate pollutants at a level well within Federal standards. (See Inventory, Appendix C.) Air circulation and air quality at the site are good. Moderate, prevailing northwesterly winds blow almost daily. Emissions from motor vehicles on River Road is the primary source of pollutants. These are presently minimal, and the prevailing winds disperse these pollutants down the valley, away from Salinas.

The major botanical resource of the Las Palmas Ranch site is the Coast Live Oak. These trees are widely dispersed throughout the property. Some of the specimens are two to three hundred years old. Generally, cattle grazing has suppressed the growth of seedlings and young oaks. There are two kinds of brush, chamise and sagebrush which flourish in two areas. Native grasses have long since been replaced by European annual grasses. Riparian vegetation is found along the Salinas River, principally willows and cottonwood.

The mammal and bird population includes species adapted to open grassland and pasture. Generally, these are transient. Permanent residents include some smaller mammals such as rodents and reptiles. The habitat appears ideal for seed eating birds such as doves and quail; and woodpeckers because of the many dead or senescent oaks. No rare or endangered species of mammal, bird, reptile or amphibians is evident on the property.

The Las Palmas Ranch property generates no significant amount of noise. Traffic on River Road and on nearby Highway 68 is the primary source of noise, but



Las Palmas Ranch

FIGURE C
SCHEMATIC SLOPE MAP

- 0-30% SLOPE
- 30-50% SLOPE
- 50%+ SLOPE

Monterey County Planning Department

field studies of Community Noise Equivalent Levels found noise levels to be in the "permissible" range. The site lies several miles off the commercial flight patterns of both the Monterey and Salinas airports, so noise tends to be intermittent and of a very low volume.

An archeological survey of the site revealed no pre-historic archeological resources. Remains of an adobe structure were located, but these were deemed beyond restoration. A ten thousand square foot Victorian manor is the site's only historically significant structure. The Las Palmas Ranch Partnership has recently restored the exterior of this imposing building, and plans to restore its interior. The developers have also been responsible for having the manor placed on the roster of National Historical Buildings (see Appendix A of the Inventory) .

There are no commercial or shopping facilities within the boundaries of the proposed River Road ADC. The closest complete shopping complex is located at the intersection of South Main Street and Blanco Road in Salinas; approximately two and one-half miles to the north.

Recreational opportunities in the Toro area are numerous and varied. Toro Regional Park and Laguna Seca Recreational Area are available for picnicking, biking, auto racing and horse-back riding. Corral de Tierra Country Club, Laguna Seca Golf Club and Chamisal Tennis Club are also close at hand.

FIGURE D: LAS PALMAS RANCH SPECIFIC PLAN LAND USE TABLE

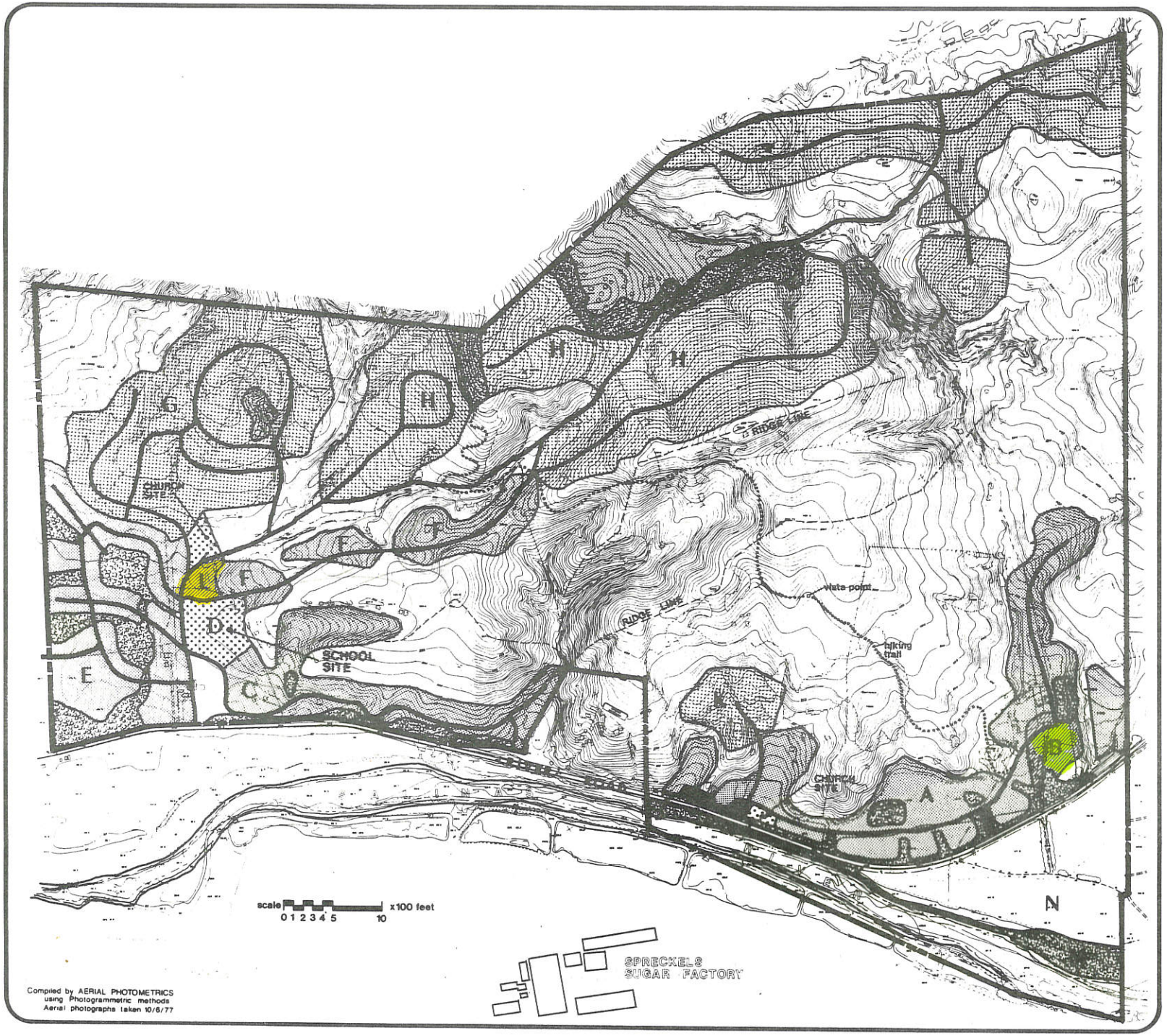
ADC Policy Plan Areas	Residential Units		Total Units	Other Land Uses	Other Acreage	Total Acres	Density Units/AC
	Multi	Single					
A	312	0	312			104	3.00
B	-	-	-	COMMERCIAL/RECREATIONAL	6	6	N/A
C	131	0	131			62	2.11
D	-	-	-	SCHOOL/CHURCH SITES	15	15	N/A
E	0	168	168			76	2.21
F	104	0	104			32	3.25
G	0	80	80			95	.84
H	0	142	142			152	.93
I	0	46	46			28	1.64
J	0	43	43			90	.48
K	0	5	5			11	.45
L	-	-	-	COMMERCIAL	6	6	N/A
M				OPEN SPACE:			
N				RIPARIAN CORRIDOR	13		
O				AGRICULTURAL LAND	56		
				NEIGHBORHOOD/INFORMAL OPEN SPACES	65		
				CENTRAL OPEN SPACE & FRONTAL SLOPES	767		
				TOTAL OPEN SPACE		901	N/A
TOTAL	547	484	1031			1579	.65 AV.

NOTE: ACREAGES BOUNDARIES OF THE PLAN AREA AND NUMBER OF UNITS WITHIN EACH PLAN AREA ARE APPROXIMATE. SPECIFIC BOUNDARIES, AND NUMBER AND MIX OF UNITS WILL BE DETERMINED AT THE TIME OF FINAL ENGINEERING, PROVIDED THAT THE TOTAL NUMBER OF RESIDENTIAL UNITS SHALL NOT EXCEED 1,031. DEVELOPMENT MAY NOT OCCUR IN THE APLHABETICAL ORDER IN WHICH THE PLAN AREAS ARE LETTERED ON THE PLAN.

Las Palmas Ranch

FIGURE E

SPECIFIC PLAN



Monterey County Planning Department

CHAPTER II

LAS PALMAS RANCH SPECIFIC PLAN

A. INTRODUCTION

1. The Value of Goals

The Las Palmas Ranch Specific Plan did not originate with county government. It began as the idea of a group of property owners who saw this large ranch being used to provide housing for the people of their community. Before their idea can achieve reality, however, it must be blended with the County's objective for development of the River Road area. The end product will be the Las Palmas Ranch Specific Plan, which will represent a joint expression of the aims and aspirations of the property owner, as well as the ends and objectives of the people of the County as declared by their local government.

This Chapter II is a statement of the aims and aspirations of the Specific Plan ("goals"); and the means by which the plan can achieve the goals ("policies").

Goals are necessry to give meaning to the short-and-long-term policies and actions called for by the Las Palmas Ranch Specific Plan. The goals set forth in this chapter are an essential expression of the commitment of the Las Palmas Ranch Partnership in connection with the development and management of their project. These goals ensure the protection of the major elements of the ranch's natural environment and rural setting, while at the same time providing a desirable residential community.

2. The Function of Policies

Policies are specific courses of action by which adopted goals are to be implemented.

The policies of this Specific Plan are intended to function as measures for the mitigation of potential environmental impacts of the project. They are also intended to serve as directions to the developer, the County staff and the public decision makers in the review and processing of the various phases of the project development. Where appropriate, policies of this Specific Plan will become conditions of approval of tentative maps and use permits.

Although the policies in this Chapter II are grouped under specific subject headings, a single policy may well serve to implement a number of goals. For example, policies stated under the agricultural land use, the design sensitivity and the erosion and drainage control sections also help to carry out the conservation and open space goal. The policies of this Specific Plan, therefore, should be considered as an integrated program of action for achieving the goals of the plan.

B. PHASING OF DEVELOPMENT

Residential development may proceed at a basic rate of up to 130 units per year. Up to 65 units may be built in addition to this basic yearly rate. Any units allowed in a year, but not built during that year may be built in following years. However, the accumulation of units shall not begin until the first residential unit is initiated.

It is important, however, to assure that adequate infrastructure such as water, sewers and roadway capacity is available or is made available to accommodate each increment of development as it is built. By the same token, the County needs to ensure that a proportionate amount of the total open space designated in this specific plan is provided at the time each phase of development commences. And although a given increment of the development may provide more or less than 15% of its housing units as low or moderate income units, it is essential that a schedule be adopted to assure that the committed number of affordable units will be provided in a reasonable and orderly progression and that the inclusionary units are not left to the end of the development or relegated to one or two isolated areas of the project.

C. HOUSING AND RESIDENTIAL LAND USE

GOAL: The primary goal of Las Palmas Ranch Specific Plan is to provide a broad mix of housing opportunities to all economic segments of the community without expanding existing urban boundaries into major farming areas.

BACKGROUND

According to the Monterey County Housing Plan, adopted by the Board of Supervisors on September 22, 1981, there is an immediate need within the County's unincorporated areas of 4,800 housing units by 1985. In order to meet this demand, the AMBAG Housing Study indicates a need for 1,000 units per year in the greater Salinas area.

Monterey County has adopted a Growth Management Policy which states in part that growth shall occur in or adjacent to urban areas or in areas specified for future growth which are able to provide urban services. The effect of this policy on the supply of housing is unknown because the implementation mechanism is yet to be adopted.

The Monterey County Housing Plan also points out the special housing needs of certain categories of households (large families, handicapped persons, the elderly, female-headed households and migrant farmworkers).

This Specific Plan responds to as many of these needs as is feasible.

The Las Palmas Ranch Partnership has entered into an agreement with the Monterey County Housing Authority to provide land in the City of Salinas at no

present cost to the Authority for the construction of fifty units of low-income family housing . The Partnership applied to the County to be allowed credit for these fifty units toward the Partnership's commitment to provide 15% of the units of Las Palmas Ranch as low or moderate income housing. On January 26, 1982 the Board of Supervisors approved these units as applying toward the inclusionary requirement.

OBJECTIVES

1. To help fulfill the continuing housing demands of the county as disclosed by the Monterey County Housing Plan and the AMBAG Housing Study.

2. To reduce the necessity for Salinas and other nearby communities to expand into surrounding major agricultural lands in order to meet housing demands.

3. To provide a range of housing affordable to all economic segments of the community.

4. To provide a full range of housing types within an environmentally sensitive plan.

5. To maintain the quality of the semi-rural residential environment.

6. To provide housing to meet the needs of the segment of Monterey County population that desires semi-rural living but with a full range of community facilities.

7. To consider the housing goals, plans and objectives of communities making up the County's housing market.

8. To explore and offer feasible, innovative methods of housing financing that will permit home ownership by a broad range of families.

POLICIES

1. The development of Las Palmas Ranch shall comply with the County's Inclusionary Housing Ordinance. Credit shall be given for the fifty units of low income family housing constructed by the Monterey County Housing Authority in the City of Salinas on the land provided by the Las Palmas Ranch Partnership.

2. All available sources of government and private financing and funding should be utilized for the construction of housing, including where appropriate the following:

U. S. Department of Housing and Urban Development, Federal Housing Administration;

U.S. Department of Agriculture, Farmers Home Administration, Home Ownership Loans Program, Rural Rental Housing Programs, Farm Labor Housing Loans Program, Water and Sewer Loans and Grants Program;

Economic Development Administration;

California Department of Housing and Community Development;

California-Housing Finance Agency;

Housing Assistance Council, Inc., Revolving Loan Fund;

Rural America, Loan Fund Policy.

3. To the extent feasible, low and moderate income housing should be disbursed throughout the project in order to minimize physical isolation and to promote social integration.

4. The appearance of the low and moderate income housing shall be compatible with other housing within the subdivision .

5. The Specific Plan allows a maximum 1,031 residential units in accordance with Figure D and Figure E.

6. Housing should be produced in an orderly phased program over a period of several years based upon market demands and availability of financing.

7. In order to preserve the semi-rural character of the area and to mitigate adverse impacts on significant viewshed areas, higher density housing should be clustered behind natural land forms, generally at lower elevations and not on steeper slopes or ridgelines.

8. An Inclusionary Housing Plan for the entire project shall be prepared by the developer reflecting compliance with the County's Inclusionary Housing Ordinance. This plan shall be submitted to and approved by the County prior to consideration of the first increment of residential development.

9. Recreational facilities and open space shall be provided on an incremental basis in accordance with project built-out.

10. Optional or modified public improvement, development, and construction standards where available should be utilized where appropriate to produce quality housing at reduced unit cost.

11. A Development Incentive Zone of ten acres shall be provided within the areas designated in this specific plan for medium density residential development. The density for this DIZ shall not exceed ten units per acre. This density may be and is encouraged to be dispersed throughout the medium density areas rather than being concentrated in a single ten-acre area.

D. COMMERCIAL LAND USE

GOAL: To provide twelve acres of centrally located commercial and service facilities appropriate to the convenience needs of the visitors and guests of Las Palmas Ranch as well as the residents of the entire River Road Area of Development Concentration.

BACKGROUND

At the present time, the only commercial outlet in the River Road ADC is a small, older convenience store across River Road from the entrance to the Pedrazzi subdivision. Although the Toro Area Master Plan designates a small area of commercial development at the corner of River Road and Pine Canyon Road, that land is presently in productive agricultural use and the likelihood is remote that the property will be developed for other than agricultural purposes in the foreseeable future, if ever. Consequently, residents of the River Road ADC must travel outside the vicinity for virtually all of their shopping needs.

The nearest complete retail and service facilities are in the City of Salinas, approximately three and one-half miles to the north. Limited convenience commercial outlets are located in Toro Park Estates, approximately two and one- half miles to the west of Las Palmas Ranch on Highway 68. A small amount of highway commercial development is called for in the Toro Vista Specific Plan, to be located on Reservation Road just west of Highway 68.

Although the residents in the Las Palmas Ranch development and in the River Road ADC should continue to look to the major commercial centers of Salinas and Monterey for the majority of their comparison goods shopping needs, the provision of convenience shopping outlets within the boundaries of the ADC would produce a number of public and private advantages. Such convenience outlets might include a "quick-stop" market with gasoline pumps, deli-liquor, barber/beauty shop, cleaners, and similar light retail shops. In addition to making shopping more convenient to the residents of the area, it would substantially reduce travel-based energy consumption, congestion on Highway 68 and resultant air pollution.

The Corey House, upon completion of its restoration, will function as a center for social and recreational activities of the residents of Las Palmas Ranch, and to a degree as a visitor attraction. it is appropriate to plan limited commercial facilities in and about the Corey House to meet the demand for dining and related activities. Furthermore, because this Specific Plan contemplates a concentration of recreational facilities around the Corey House for the utilization of the residents of the development and their guests, provision should be made for the availability of food, drink, recreational and athletic supplies and other similar goods in this vicinity. Commercial facilities around the Corey House might include a restaurant, sports shop, gift store, deli and similar uses.

In order to best meet the needs of all of the residents of the River Road ADC, the main body of commercial facilities should be centrally located. A

FIGURE F COREY HOUSE RESTORATION

location near the eastern end of the Las Palmas Ranch property would be centrally located to all existing and proposed development within the ADC.

OBJECTIVES

1. To develop a centrally located commercial and service area at the easterly end of Las Palmas Ranch to service the convenience shopping needs of the residents of Las Palmas Ranch and the River Road ADC.

2. To develop a small commercial and service facility in and about the Corey House to meet the convenience needs of visitors to the Corey House and those utilizing the recreational facilities in and about the Corey House.

POLICIES

1. Retail commercial and service facilities appropriate to meet the convenience shopping needs of the residents of Las Palmas Ranch and the River Road ADC should be provided in the area designated as "L" in Figure D.

2. Retail commercial and service facilities appropriate to the convenience needs of the visitors to the Corey House and those utilizing the recreational facilities in and about the Corey House should be developed in the area designated as "B" in Figure D.

3. All commercial development shall be of a size, design and intensity compatible with the semi-rural character of the River Road ADC.

4. The design, lighting and materials of all commercial signing for the development shall be carefully regulated to assure compatibility with the semi-rural character of the area.

5. All areas proposed for commercial development should be placed in Planned Commercial ("PC") or similar zoning providing for continued regulation by the County of uses, design, parking, landscaping and signing.

E. CIRCULATION

GOAL: To provide a safe, efficient and aesthetically pleasing system for the circulation of automobiles, pedestrians and other modes of transportation within the project; and to consider the reasonable needs for travel to and from the project.

BACKGROUND

Circulation concerns for the Las Palmas Ranch fall into two principal categories: (1) The internal provisions for circulation within the project itself, and (2) the external matter of travel to and from the project. The former is primarily within the purview of the developer's responsibilities; the latter, although a matter

of concern to this project, is primarily a problem for regional or even state solution.

The internal circulation system for Las Palmas Ranch will consist of two major collector roads. The collector serving the western portion of the project will enter River Road approximately at the Corey House. The collector serving the eastern portion of the project will enter approximately two miles further down River Road (see Figure D).

Neighborhood subcollector streets and lanes are designed to provide safe and efficient access to all portions of the project while maintaining a sense of separation and independence for the various residential neighborhoods.

This Specific Plan anticipates extensive use of optional design and improvements standards as provided by the Monterey County Subdivision Ordinance in order to maintain a rural character and enhance the liveability, convenience and appearance of the development. Although it is proposed to observe county standards as to materials, minimum lane width and longitudinal grades, optional standards are proposed as to maximum cul-de-sac length, width of right of way, and use of curb and sidewalk. These reduced standards will be offset in some cases by the generous provision in the plan for off-street parking and by the use of turnouts and turnarounds for emergency equipment.

All development costs of the on-site circulation network will be funded by the developer (see Chapter IV). It is proposed that the major collector roads and subcollector streets in the higher density areas will be dedicated public streets. Private roads may be utilized for some of the larger lot single family development, and for the interior lanes within PUD clusters.

Provision will be made within the project to accommodate alternative means of transportation to the automobile. A system of pathways suitable for pedestrian and bicycle use will connect the residential areas with commercial, educational and recreational centers. Although public transit does not presently serve River Road, it is expected that such service will be provided as development of this project and Toro Vista proceeds. Safe, centrally located bus loading areas for both public transit and school buses are proposed for both the western and the eastern portions of the project.

OBJECTIVES

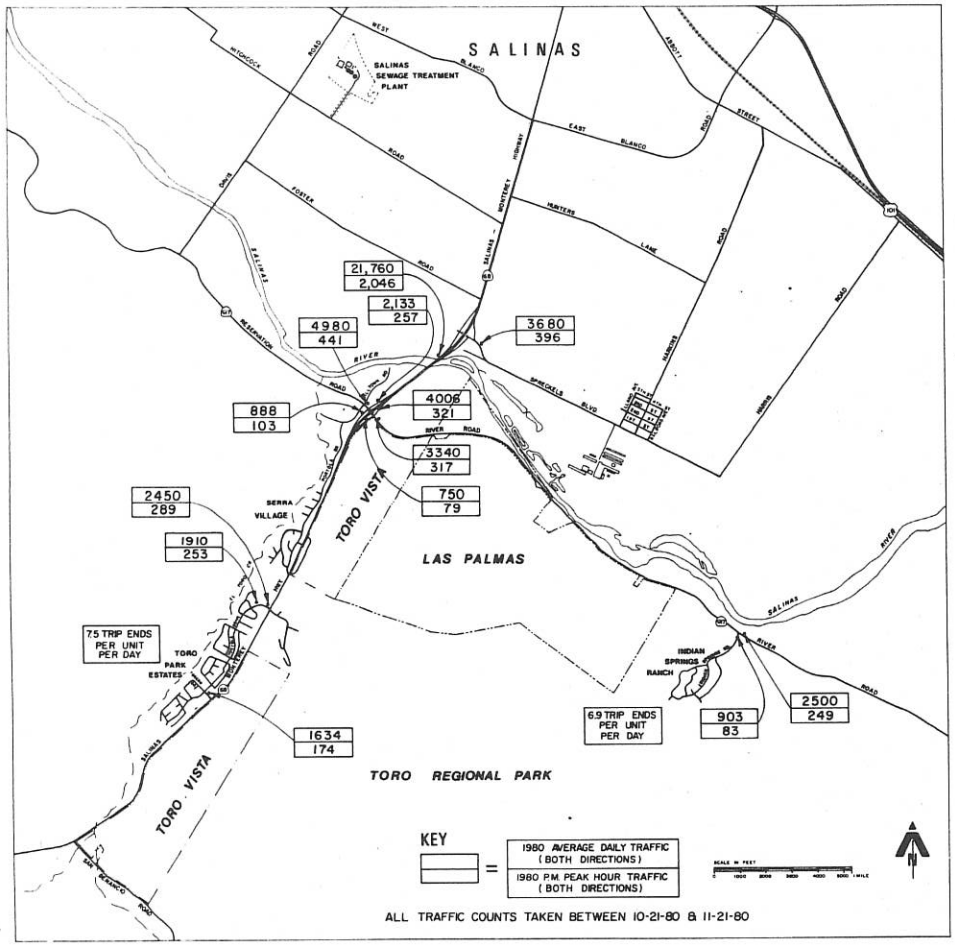
1. Provide an internal circulation system of collector roads and neighborhood collector streets and lanes providing safe, efficient and aesthetically pleasing access to the areas of development for automobiles, pedestrians and alternative modes of transportation.

2. Provide or participate in the provision of off-site improvements reasonably necessary to assure safe travel to and from the project.

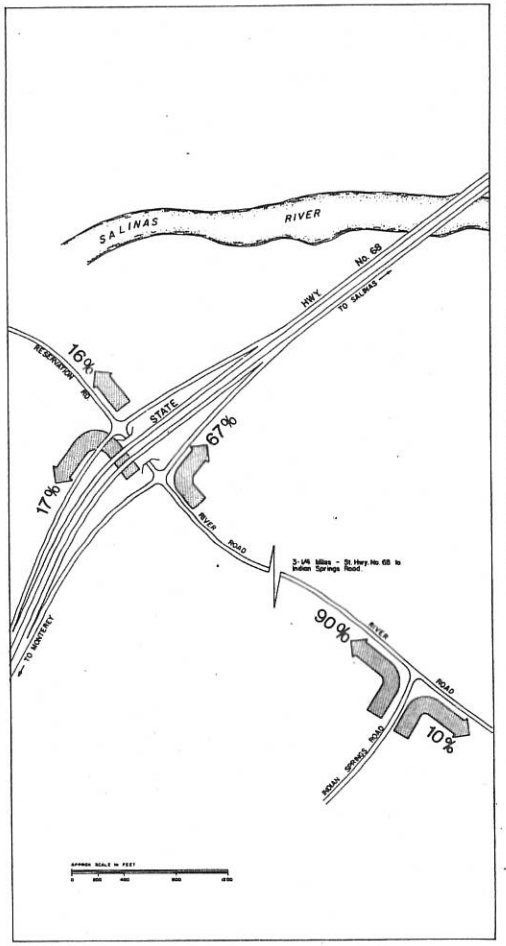
Las Palmas Ranch

FIGURE G

1980 TRAFFIC VOLUMES AND DIRECTIONAL SPLIT DATA



October 1980 Traffic Counts



Directional Split Data For Indian Springs Morning Peak Period Traffic

Monterey County Planning Department

POLICIES

1. Provide a system of pathways suitable for pedestrian and bicycle use to connect residential areas with commercial, educational and recreational areas of the project.

2. Safe, attractive and centrally located loading areas for school buses and public transit should be provided at appropriate locations in both the east and west areas of the project as determined by consultation with transit agencies.

3. Adequate off-street parking should be provided as a means of reducing road congestion, particularly in areas where reduced road right-of-way is proposed.

4. Turnouts and turnaround facilities may be required to accommodate emergency vehicles in areas of reduced road right-of-way or where longer cul-de-sacs are proposed.

5. Interior roads shall have longitudinal grades not exceeding 15%.

6. With the following exceptions, on-site roads shall be privately owned and maintained.

A. Extensions of existing public roads. Such connections and extensions shall be publicly owned and maintained.

B. Subdivision roads maintained by user fees or other locally-generated revenues, and not by the county road fund. Such roads may be publicly owned.

7. The internal circulation system should be designed to accommodate a level of service "C" at full buildout. A trip generation factor of 8.0 trips per day per unit shall be used for this project.

8. The use of optional design and improvement standards is encouraged for the internal road system to reduce visual impacts, maintain a rural character and enhance the liveability, convenience and appearance of the project. Subject to specific review in each case, such optional standards shall permit extended cul-de-sac length and elimination or reduction of curbs and sidewalks, and may permit reduced right-of-way.

9. Roads which are perpendicular to viewing areas of which involve excessive cut and fill shall be discouraged.

10. Horizontal and vertical street alignments should relate to the natural contour of the site insofar as is practical, while retaining safe sight distance for expected driving speeds but not less than *25* mph.

11. Street name signs and regulatory devices constructed of wood or other natural materials and of the size and height compatible with the surroundings should be utilized.

12. The developer shall dedicate fee title along the project frontage on River Road so that the sum of the width of existing right-of-way and new dedication (on either side) equals 110 feet. Widening in excess of 110 feet may be required for slopes. These slopes may be provided for as slope easements and may be landscaped by the developer and included as part of the meandering 50 foot setback/landscaped area described in Conservation and Open Space Policy #9.

13. Access to the development will be by public road intersections including left turn channelizations constructed by the developer on River Road at the entrances to the subdivision. Design and construction shall be compatible with the widening of River Road as contemplated by Policy #12 above.

14. Internal road connections should be provided where feasible between the areas of the subdivision in order to minimize the need for River Road to provide a route for intra-subdivision traffic.

15. Road connections should be provided where feasible between the subdivision and adjacent subdivisions in order to minimize the need for subdivision traffic to utilize River Road.

16. The developer shall pay a development fee to the County for improvements to Highway 68. This development fee shall be $620.75 per residential unit (a total of $640,000.00, being 10.66% of the estimated cost of the two lane first phase of the Corral de Tierra bypass), and shall be payable as to each residential unit at the time the building permit for the residence is issued.

17. The maximum contribution to improvements to River Road shall be $1,400,000 (prior to indexing). This contribution shall be for a project to be designated by the County Public Works Department. A payment of 1/1031 of this amount shall be paid to the County at the time each residential building permit is issued. When 600 such permits have been issued the designated road improvement project shall be built. If the accumulated contributions are insufficient to fund the project, the developer shall then contribute the balance of the cost up to the above maximum obligation.

18. The development contributions provided in Policies 16 and 17 are based on 1983 dollars, and will be adjusted annually in accordance with the West Coast Engineering News Record General Engineering Cost Index. These development contributions, together with the dedications and improvements required by Policies 12 and 13 shall constitute the project's total required participation in the construction or financing of off-site roads and circulation facilities.

F. CONSERVATION AND OPEN SPACE

GOAL: To conserve and protect in open space those aspect of Las

Palmas Ranch that constitute the major visual and environmental resources of the site; and to provide for the managed utilization of open space for active and passive recreational purposes.

BACKGROUND

Open space is an essential component of any well-designed residential project. It provides areas for active and passive recreation immediately adjacent to dwelling units. It increases project amenity by providing landscaped areas and important scenic vistas. Open space can be an important design element, breaking up monotonous patterns of housing and improving the visual attractiveness of the development. Open space increases design flexibility and permits the preservation of natural features for even greater amenity.

By statutory definition open space includes banks of rivers, riparian vegetation, watershed lands, outdoor recreation areas, areas of outstanding scenic, historical and cultural value, and areas of economic importance used for production of food and fibre.

A number of these open space components are found within Las Palmas Ranch and are therefor incorporated in this Specific Plan.

The first component of the Las Palmas Ranch open space includes the banks of the Salinas River and the narrow band of riparian vegetation adjacent thereto. These areas constituting the northerly boundary of Las Palmas ranch, will be left in their natural state and retained in the ownership of the developer.

The second open space component of Las Palmas Ranch is the approximately *50* acres of level land lying between the riparian corridor and River Road. This area will be preserved in agricultural use.

This agricultural land shall be placed in permanent agricultural zoning. It will remain in the ownership of the developer or a successor entity, and will be leased for farming purposes.

The Corey House itself and the grounds around it constitute the third component of the Las Palmas Ranch open space. The developer has already restored the exterior of this magnificent structure, and has had the building placed on the roster of National Historical Buildings. The Corey House is suitable for a variety of active uses; as a social center for the project and headquarters for the recreational complex around it; as a center for retail commercial and service facilities to meet the needs for those utilizing the recreational facilities and visitors to the historic residence. The Corey House itself will remain in the ownership of the developer, with space being leased to the various users including the owner's association. The recreational facilities surrounding the Corey House will be owned and managed by the owners' association for the use of the project residents and their guests.

By far the largest of the open space components, consisting of approximately 767 acres, is the central open area embracing the central ridge lines and north-facing frontal slopes visible from the Highway 68 Scenic Corridor (see Figure H). This area constitutes the major watershed area of the ranch as well as the prime visual resource visible from within the ranch and from the Highway 68 Scenic Corridor. This area should provide an excellent source of active and passive enjoyment for the residents of Las Palmas Ranch (see discussion in Section H of this Chapter II). This plan calls for this area to be left basically in its natural state. Improvements will consist only of trails, vista points and drainage and erosion control devices. This central open area will be owned and managed by the master owners' association, and should be placed in open space zoning and subjected to appropriate scenic easements.

The final component of open space in the Las Palmas Ranch project includes the smaller parks and recreational areas which are interspersed within and among the clusters of higher density development. Some of these areas are shown in Figure D. Others will be designed as each increment of cluster development is proposed. These areas will be owned and managed by the neighborhood or village owners' association. The utilization of these neighborhood open spaces as a means of separating housing clusters and providing visual screening is illustrated in Figure K.

OBJECTIVES

1. To preserve the site's major frontal slopes and ridgelines in open space in order to maintain the rural setting as a visual backdrop to the clustered housing.

2. To provide for continued agricultural use of lands north of River Road.

3. To maintain a feeling of open space along the immediate River Road corridor.

4. To conserve the Salinas River bank and the adjoining riparian vegetation in open space.

5. To preserve and enhance the historical significance of the Corey House.

6. To utilize open space as an important design element for avoiding monotonous patterns of development.

7. To provide for active and passive enjoyment of the open space within the project.

8. To assure open space integrity through ownership and management entities.

POLICIES

1. The following constitute the open space elements of Las Palmas Ranch to be protected:

A. The Salinas River bank and the riparian vegetation adjacent thereto;

B. The agricultural land north of River Road;

C. The central ridge lines and north-facing frontal slopes visible from the Highway 68 Scenic Corridor as delineated on Figure H.

D. The Corey House.

2. Prohibit building on ridgelines visible from designated scenic corridors, as delineated on Figures H and K.

3. Higher density housing units shall be clustered behind natural landforms or on lower elevations.

4. Open space areas shall be placed in scenic easements and open space zoning or otherwise adequately protected from development that could destroy the natural amenities of the site.

5. The open space areas other than the riparian corridor, the agricultural land and the Corey House shall be conveyed to an owners' management association or other appropriate entity legally empowered and obligated to manage these areas and to collect fees or assessments therefor.

6. A proportionate amount of open space should be provided with each increment of housing. Trails provided within the open space management plan shall be dedicated at the time the area is unencumbered and the open space is dedicated.

7. Roads which are perpendicular to viewing areas or which involve excessive cut and fill shall be discouraged.

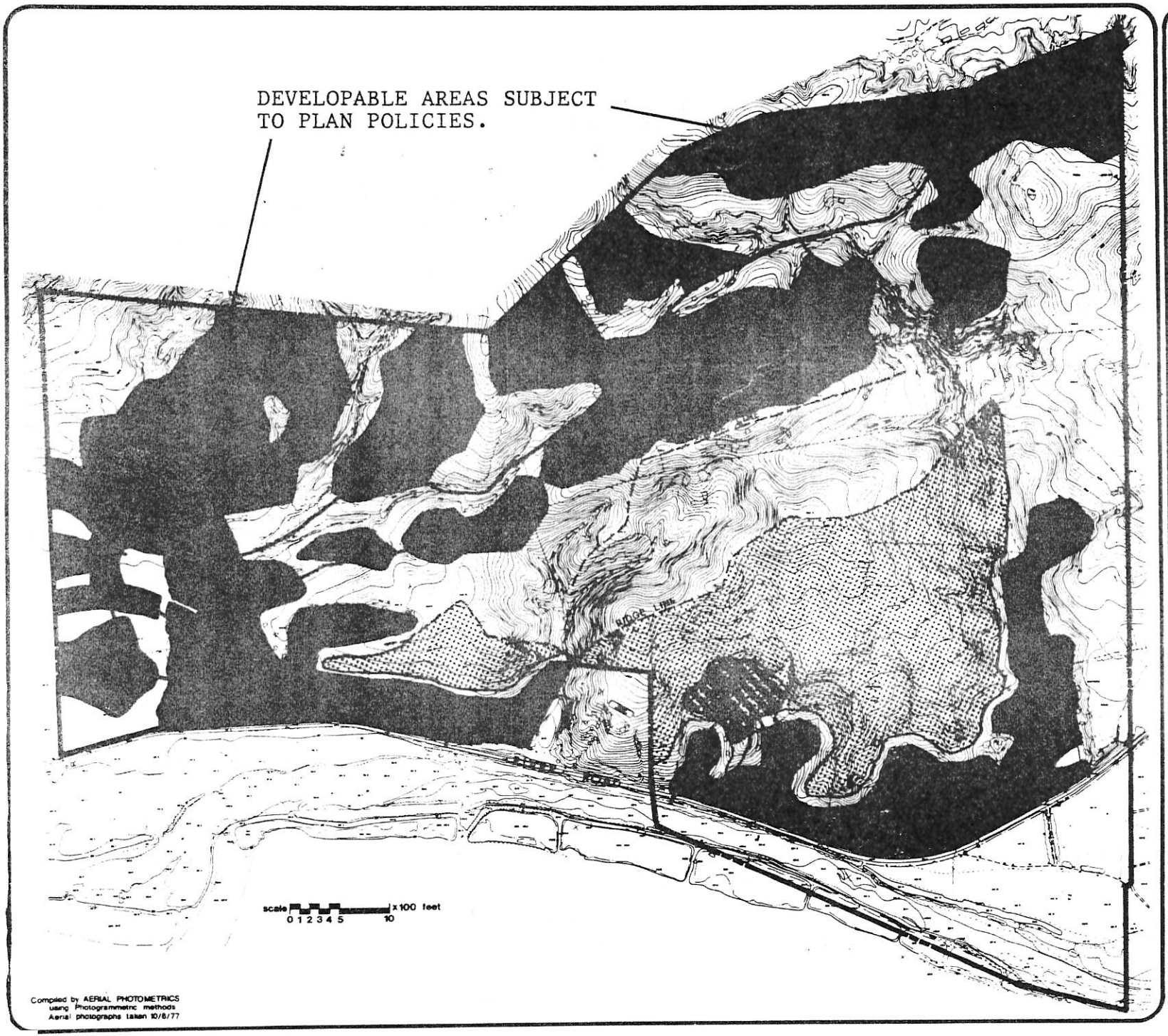
8. Horizontal and vertical street alignments should relate to the natural contours of the site insofar as is practical.

9. An irregular or meandering landscaped setback, with a minimum depth of fifty feet, shall be established along the frontage of River Road.

10. Utilize mounding, informal massing, or irregularly spaced trees, planting and other overall landscaping treatment to screen development.

11. Visually obtrusive building materials and finishes shall be avoided.

12. Erosion, siltation and drainage controls shall be implemented in order to enchance watershed management, to protect on-site and riparian vegetation, to



Las Palmas Ranch

FIGURE H
FRONTAL SLOPES

FRONTAL SLOPES VISIBLE FROM SCENIC HIGHWAY

Monterey County Planning Department

facilitate on-site retention and percolation of surface water, and to minimize hazards to development.

13. Facilities providing for active and passive recreational uses of the open space areas may be provided subject to County approval.

A. Such facilities may include hiking, jogging, and equestrian trails and vista points within the central hillside open spaces.

B. Tennis and racquetball courts, swimming pools, play fields, health club facilities, and similar more intensive recreational facilities may be located in the areas designated in Figure E for recreational uses.

C. Mini-parks, jogging trails, playgrounds, swimming pools, tennis courts, and similar facilities may be located within the smaller open space areas interspersed among the residential clusters.

D. Recreational facilities shall be managed and maintained by an owners' management association or other appropriate entity legally empowered and obligated to manage these areas and to collect fees or assessments as necessary for their maintenance.

E. A comprehensive Open Space/Recreation Management Plan for all open space areas of the project, shall be prepared by the developer indicating how the open spaces within the project will be used, managed and conserved. This program shall be submitted to and approved by the County prior to final discretionary approval is given by the County for any portion of the development authorized by this specific plan.

14. The central open space areas of the project south of River Road may be utilized for wastewater treatment and disposal when consistent with the approved Open Space/Recreation Management Plan and the approved Wastewater Management Study.

G. ENERGY CONSERVATION POLICIES

1. Each residential unit should be afforded adequate solar access for the operation of active and passive solar systems. Locating structures with their major axis oriented within 22.5º of true east/west is generally the best means to insure adequate south-facing solar access. For single-family homes, the orientation is fairly simple to implement as is full access to the south wall for passive solar design. For multi-family units, orientation and access are more difficult; generally south roof access for active space heating or domestic water heating systems is considered sufficient.

2. Careful design of structures to utilize solar access and to control heat loss and heat gain can achieve significant energy conservation. When these design elements are coupled with passive design features (thermal storage units, south facing glass, domestic hot water systems and other energy conserving components),

the energy conservation potential greatly increases. Support structures built by the developer such as commercial areas, swimming pools, recreation and community buildings should make maximum use of alternate energy sources both to reduce operation costs and to serve as community examples.

3. The addition of pedestrian and bicycle paths to the internal circulation systems could further reduce the need for automobile use.

H. PRESERVATION OF SIGNIFICANT AGRICULTURAL LAND

GOAL: To preserve and protect significant major areas of prime and productive agricultural land.

BACKGROUND

In Monterey County's unincorporated areas, agriculture is by far the most predominant land use. The Salinas Valley contains some of the finest agricultural soil in the world, and is one of the only areas in the United States with a large level area of highly productive soils, as well as ocean fog which is so desirable for succulent vegetables. Historically, agriculture has been the greatest single source of income in the County of Monterey.

As the population of the County has continued to increase over the years, it has become increasingly apparent that this agricultural base of the economy must be protected, while accommodation is made for anticipated growth. Consequently, the County's plans are replete with policy statements attempting to balance these potentially conflicting interests.

As thus proposed, this Specific Plan is consistent with the agricultural land preservation policies of the Monterey County General Plan and the Toro Area Master Plan.

OBJECTIVES

1. To provide for permanent agricultural use of lands north of River Road and to preserve them in open space.

2. To relieve pressure for residential land use on intervening prime agricultural lands in the area south and southwest of the City of Salinas and north of the Salinas River (the Blanco Area).

3. To accommodate the foreseeable housing demand within the River Road ADC, utilizing a compact residential land use pattern.

4. To direct residential expansion into the non-agricultural belt along the foothills.

POLICIES

1. Preserve the agricultural lands north of River Road in agricultural zoning and in a permanent agricultural open space easement.

2. Retain the lands north of River Road in agricultural production.

I. DESIGN AND SENSITIVITY

GOAL: To provide a program of design standards and regulation to assure that all structural development at Las Palmas Ranch will be aesthetically pleasing, internally consistent and visually integrated with the natural surroundings including major open spaces.

BACKGROUND

Section E of this Chapter II identifies the significant open space elements of the Las Palmas Ranch site. The policies enunciated in that section provide for the appropriate placing of concentrated development on the site consistent with the conservation of these major open space elements.

The design of the roads, buildings, and other facilities is equally as important to the overall visual impact of the project as is the location of development. This section establishes the policy framework for the design of such improvements.

The primary design consideration shall be the creation to the extent possible of a "rural" or "country" atmosphere within the development. Too often "rural" or "country" is equated mistakenly with rambling ranch-style homes on large lots; yet most residents in concentrated housing in the unincorporated areas (for example, San Benancio Village, The Bluffs, Del Mesa Carmel) feel that they live in the "country" and that their development is "rural." An analysis of such projects, both in Monterey County and elsewhere, discloses a number of common design features which help to create the "rural" or "country" atmosphere:

Sensitive design of buildings emphazing the relationship of buildings to natural land forms and utilizing nonobtrusive natural materials such as wood and native stone, and low intensity exterior colors.

Clustering of buildings in curvilinear patterns inerspersed with open spaces.

Landscaping which follows "natural" patterns, i.e., irregular shapes and mounded surfaces, informal massing, or irregularly spaced trees and plantings.

Preservation of mountains, hillsides and significant woodlands or farm areas which can be seen from the development areas creating a sense of closeness to major open spaces.

Public improvements which reflect a "country" rather than a "city" atmosphere, e.g., meandering walkways of natural materials rather than curbs and sidewalks; exterior lighting including street lighting controlled as to intensity and direction; traffic, directional and other signing made of wood and without interior lighting.

Availability of active and passive recreational opportunities not available in the city.

OBJECTIVES

1. To mitigate adverse visual impacts of the proposed development upon significant open space and viewshed areas.

2. To create to the extent possible a visual sense of "country" living within the development.

POLICIES

1. All areas of the project proposed for structural development shall be placed in a site and design control district to ensure county enforcement of the design policies of this specific plan.

2. The deed restrictions for the project shall provide for the master homeowners association to have architectural and site review authority to enforce the design policies of subdivision deed restrictions. This authority shall be in addition to the design control authority of the County. Adoption of this Specific Plan shall not be construed as an obligation on the part of the County to create or enforce homeowner association rules.

3. All structures, including residential, commercial, recreational and accessory buildings; fences; walls; decks and signs shall require design approval. Approval shall be based upon conformity with the policies of this plan as well as the following specific criteria:

A. Compatability of external design, materials and colors with existing structures in the development and with the semi-rural setting.

B. Conformity of design and location of structures with respect to existing ground elevations and natural land forms.

C. Mitigation of visual impacts visual from within the development and from major designated view corridors outside of the project.

D. Protection of significant trees and vegetation. Trees over 36" in circumference (four feet above the ground) shall be retained. Where it is necessary to remove such trees for better design or layout, then they shall be replaced on a two for one basis subject to the approval of the Director of Planning.

E. Prevention of erosion, sedimentation and visual impacts resulting from grading, excavation, cutting or filling.

4. To the extent feasible, all structures should utilize natual materials such as wood and native stone and low intensity earth-tone exterior colors. Visually obtrusive building materials shall be avoided.

5. Low level exterior lighting, including street lighting shall be utilized consistent with maintenance and public safety and shall be unobtrusive, harmonious with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. Street lights may not be used unless approved as conditions of permits obtained pursuant to this plan.

6. Horizontal and vertical street alignments should relate to the natural contours of the site insofar as is practical. Roads which are perpendicular to viewing areas or which involve excessive cut and fill should be discouraged.

7. Mounding, informal massing, or irregularly spaced trees, planting and other overall landscaping treatment should be utilized to screen development.

8. Preserve vegetation significant to the maintenance of visual quality and to the provision of erosion control on sensitive slopes.

9. Where possible consistent with public safety, alternative public improvement standards should be applied by the county to reduce visual impacts and add to the rural character of the development. Such alternative standards may allow, where appropriate:

A. Reduced graded section of roads.

B. Elimination of sidewalks or utilization of meandering pathways of natural materials in the place of sidewalks.

C. Elimination of curbs or utilization of berms or vee gutters in the place of curbs.

D. Extended cul-de-sacs rather than looped roads.

E. Street lights at greater intervals; street lights of lower intensity; and street lights on ground level standards.

F. Street name signs and regulatory devices constructed of wood or other natural materials and of a size and height compatible with the surroundings.

10. All new utilities shall be placed underground.

11. No development shall be allowed on slopes over 30%, except where necessary for construction of limited portions of roads following existing ranch roads, serving the development areas shown on Figure F; or where necessary to

maximize the goals, objectives and policies of this Plan and the Monterey County General Plan.

J. EROSION, DRAINAGE AND FLOOD CONTROL

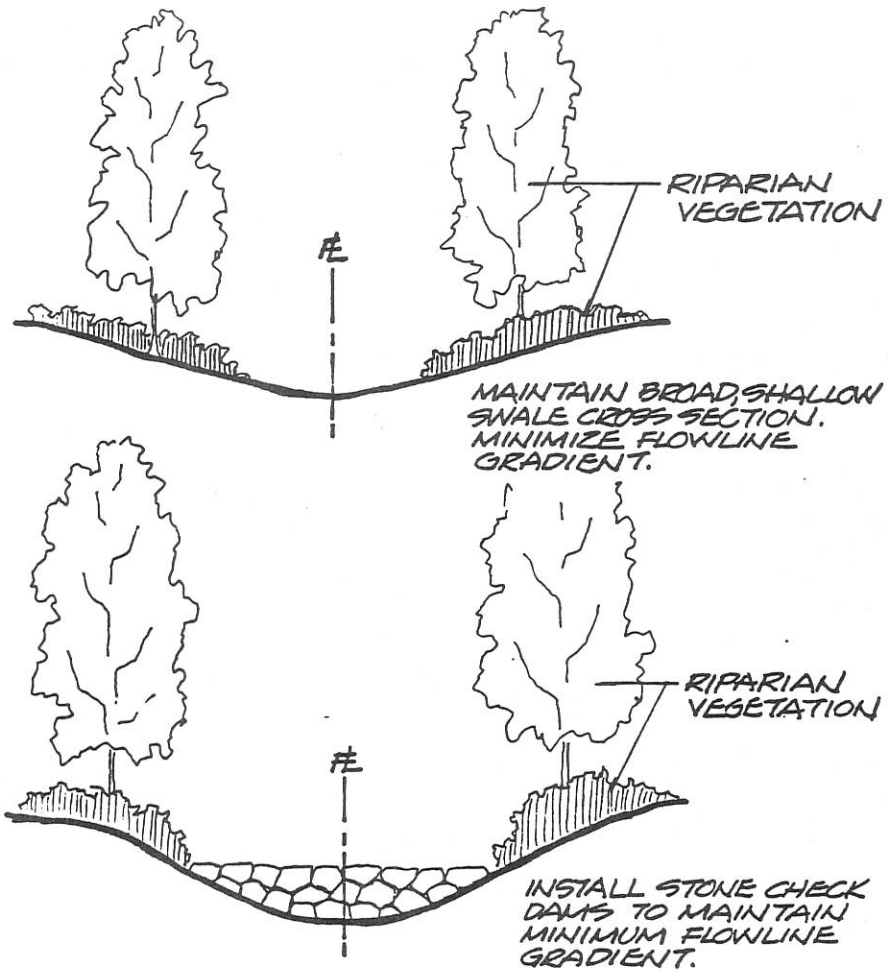
GOAL: To minimize erosion, siltation and sedimentation, and to protect on and off site areas from damage, through an integrated watershed management and flood control program.

BACKGROUND

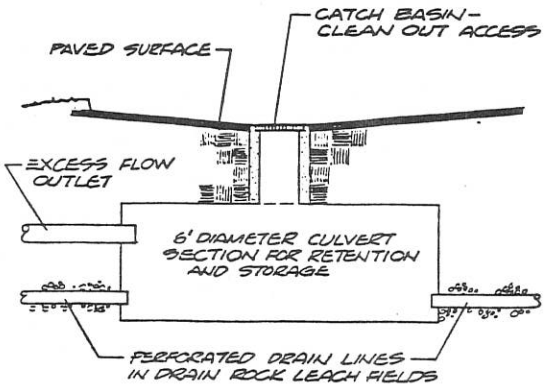
In November of 1980, Cooper and Clark, consulting engineers, published their report entitled "Phase I - Geologic Reconnaissance and Geologic Hazards Investigation - Las Palmas Ranch." The report provides detailed information relative to existing site conditions and the erosion potential of the Las Palmas Ranch property. The full report is on file with the County of Monterey. Figures I and J, reproduced from that report, show the topography and geologic units within the property.

According to the Cooper and Clark report, the Las Palmas Ranch contains three principal drainage systems. The westerly boundary of the property is drained by a system terminating near the Corey House. A second drainage system terminates in the central portion of the site, across from the Spreckels Sugar Factory. The third drainage system exists in the southeast portion of the site. The report indicates that the site vegetation consists of open grass-covered slopes with scattered growths of trees. Soil cover is widespread with sparse bedrock outcrops. Moderate to severe erosion is presently occurring along the drainage areas.

Analysis of the Cooper and Clark report by the project engineers and the project landscape architect indicates that the installation of erosion control devices such as slope planting and other landscaping, desilting basins, check dams and retention basins, could increase the times of concentration and thereby reduce the expected peak runoff volumes. Such a program could not only prevent further contamination of the Salinas River, but actually decrease the amount of sediments presently reaching the river. An erosion and drainage control program embodying these principles has been developed for the project by means of which erosion, siltation, sedimentation and drainage controls will be implemented in accordance with the Monterey County Master Drainage Plan.



DRAIN SWALES AND CHECK DAMS
NO SCALE



LENGTH OF CULVERT STORAGE SECTION WOULD VARY ACCORDING TO CAPACITY REQUIREMENTS DETERMINED BY AREA OF PAVED SURFACE TO BE DRAINED.

UNDERGROUND STORAGE/RETENTION
NO SCALE

Las Palmas Ranch

FIGURE I

EROSION AND DRAINAGE CONTROL CONCEPTS

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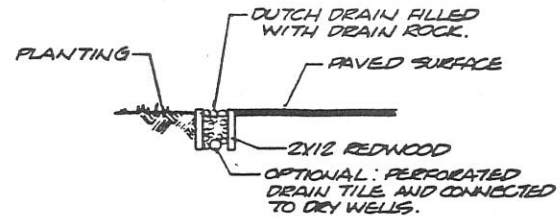
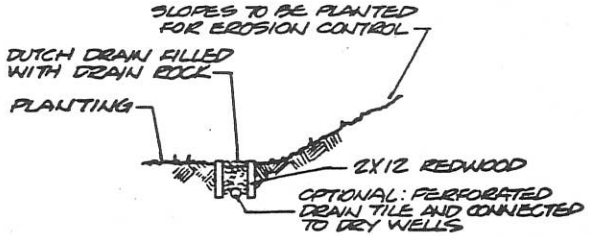
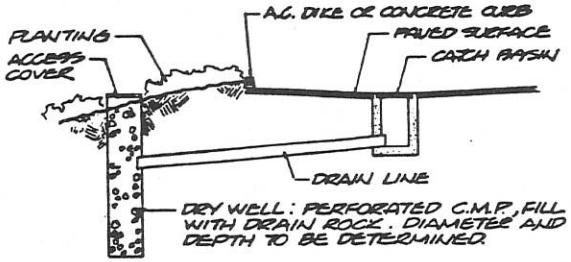


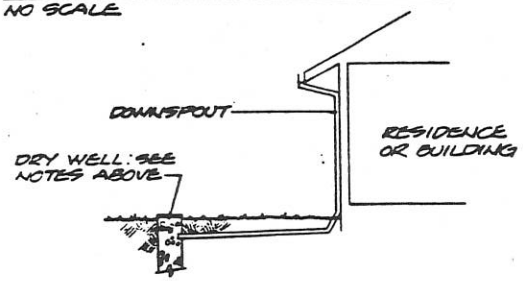
DUTCH DRAIN AT PAVED AREAS
NO SCALE



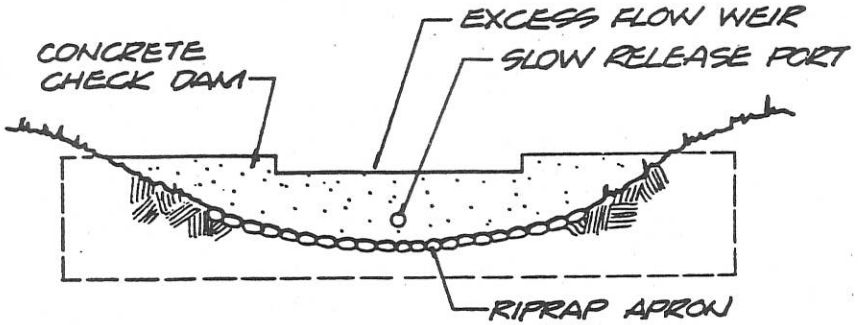
DUTCH DRAIN AT TOE OF SLOPES
NO SCALE



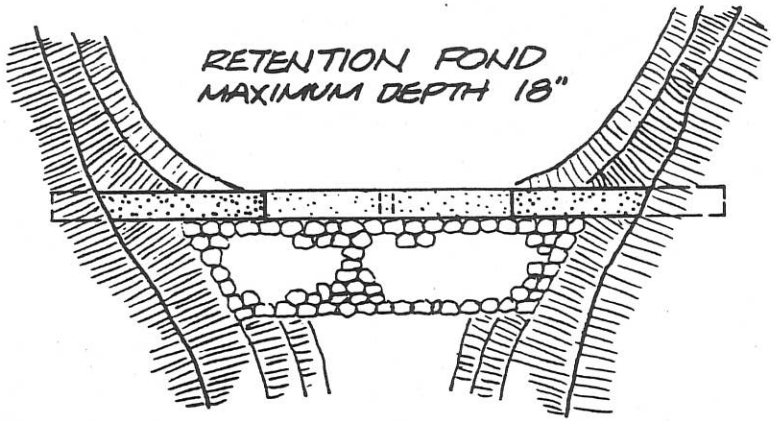
DRY WELLS AT PAVED AREAS
NO SCALE



DRY WELLS AT DOWNSPOUTS
NO SCALE



ELEVATION



PLAN

CHECK DAM AT RETENTION PONDS
NO SCALE

Las Palmas Ranch

FIGURE J
EROSION AND DRAINAGE CONTROL CONCEPTS

Monterey County Planning Department

OBJECTIVES

1. To protect on and off site areas from adverse effects of erosion, siltation and sedimentation.

2. To retain or percolate surface water on site to the maximum extent feasible.

3. To protect development from any adverse impacts from potential flooding of the Salinas River.

POLICIES

1. A comprehensive drainage plan for the entire project shall be prepared by the developer, and submitted to and approved by the County prior to final discretionary approval is given by the County for any portion of the development authorized by this specific plan.

2. Minimize alteration of natural drainage systems described in the Cooper and Clark report.

3. provide drainage reports for each phase of development showing all tributary areas and information pertinent to the capability of storm water detention and silt control facilities and mitigations for such identified impacts will be implemented.

4. Provide storm water detention/siltation ponds so that the flow rate from development will not exceed that from the tributary areas in its natural state during a ten year design storm.

5. Maintain and protect all natural streams or drainage corridors from development encroachment and where necessary make improvements to flowline gradients and to unstable side slopes.

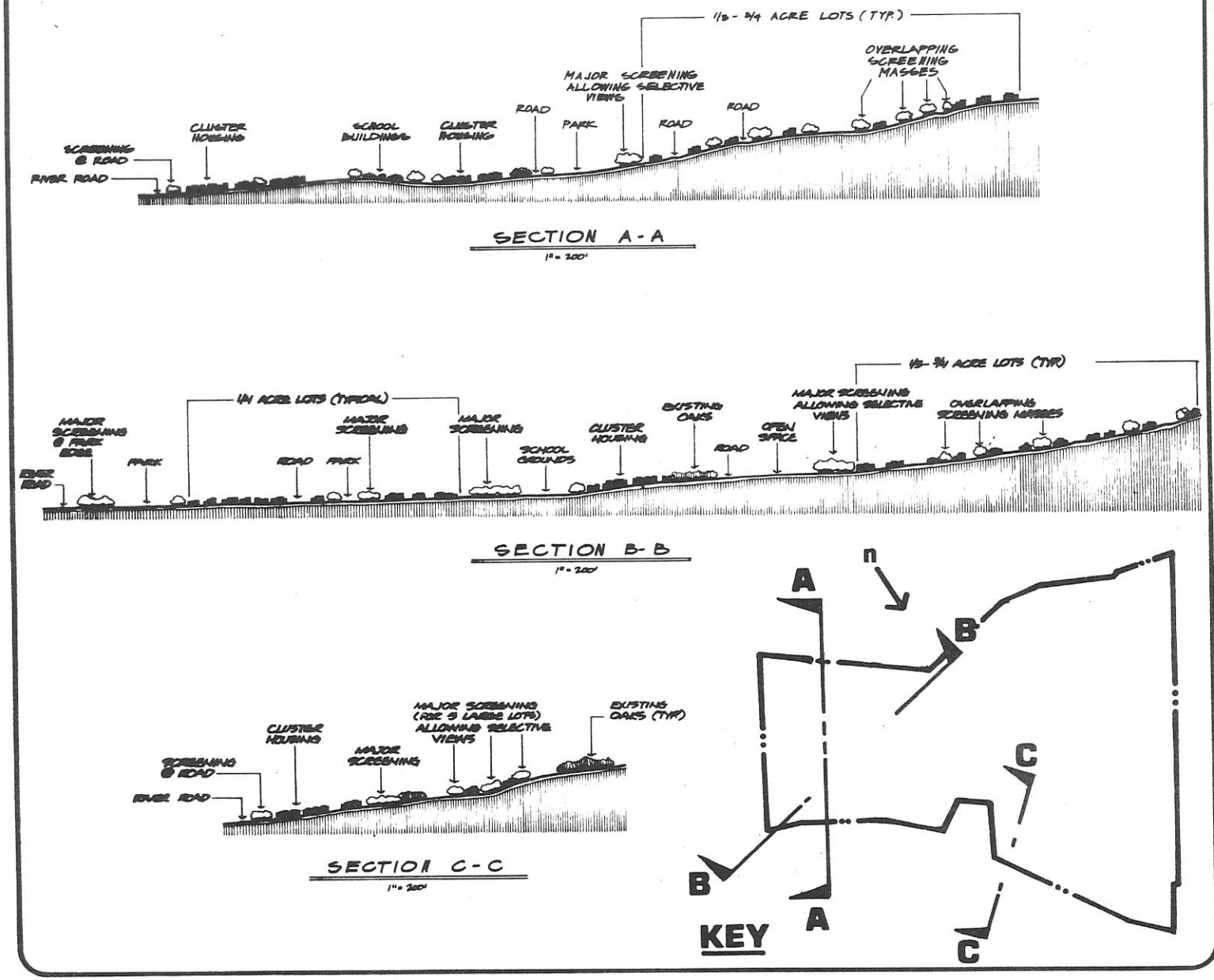
6. Plant all drainage ways with riparian vegetation to control downstream concentration of runoff, to promote upstream retention and to sustain streamflow over a longer period of time.

7. Minimize disturbance or removal of existing vegetation, including trees, shrubs and grasses or other ground covers.

8. Provide engineering plans with each phase of development demonstrating that cut and fill slopes can be stabilized; the specific method of treatment and type of planting by area for each soil type and slope required to stabilize cut and fill slopes; and the time and amount of maintenance required to stabilize cut and fill slopes.

Las Palmas Ranch

FIGURE K
CONCEPTUAL CROSS SECTIONS, NEIGHBORHOOD OPEN SPACES



Monterey County Planning Department

9. All graded areas of street rights-of-way shall be planted and maintained to control erosion. The area planted shall include all shoulder areas and all cut and fill slopes.

10. Require careful stockpiling of top soil to provide an adequate supply for placement on all graded or distrubed areas to ensure good plant growth for erosion control.

11. Maintain temporary erosion controls during construction. Improvement plans shall include a plan and implementation schedule of measures for the prevention and control of erosion, siltation and dust until erosion control plantings become established.

12. An owners management association or other appropriate entity shall be formed which is legally empowered and obligated to manage and maintain drainage and erosion control areas and facilities not owned or maintained by public agencies, and to collect fees or assessments therefor.

13. Provide drainage devices where controlled storm drainage is necessary.

14. Provide storm drainage retention devices and enlarge dissipaters to reduce runoff in development areas so that the flow rate from development will not exceed that from the tributary area in its natural state during a ten-year storm.

15. Protect areas of potential aquifer recharge through the proper utilization of drainage facilities, open space and permeable materials.

16. Conform to State and County health standards for utilization and distribution of waters.

17. All storm water drainage facilities shall be constructed so as to outlet directly into the Salinas River under full flood conditions.

18. The developer shall:

A. Improve downstream drainage structures sufficiently to pass existing 10 year frequence flows through to the Salinas River.

B. Delineate the 100 year floodway and floodway fringe on the subdivision map based on the 1980 FEMA Flood Insurance Study or such maps as may update existing flood hazard area studies.

19. No development shall occur in the floodway and structures built in the floodway fringe shall be flood- proofed.

K. PUBLIC FACILITIES AND SERVICES

GOAL: To provide appropriate levels of public facilities and services to serve the higher intensity land uses proposed for the Las Palmas Ranch.

BACKGROUND

The Monterey County Growth Management Policy states that areas of higher density development must provide appropriate levels of public services, such as water, sewage disposal, roads, schools and fire protection.

Public service concerns associated with the Las Palmas Ranch project include both capital improvement, or one-time infrastructure needs; and on-going operating needs.

Since the passage of Proposition 13 there have been great changes in the manner in which public services are provided. While property taxes and general fund monies were the principal source of funding in the past, direct developer installation of on-site infrastructure in conjunction with development fees and assessments is now the norm.

The county will look to the developer of Las Palmas Ranch to be the prime mover in making the necessary public services and facilities available. In some cases, such as the waste water treatment system, this will require creating a system where none now exists. In other cases, such as the water system, schools and fire protection, it may mean meeting demands for increased capability of existing delivery systems.

The purpose of this section of the plan is to establish what public facilities may be needed to accommodate the development of Las Palmas Ranch, and when and in what form they should be provided. Various means of financing initial construction and on-going operation are discussed in Chapter IV.

1. WATER

Fortunately the River Road area is blessed with an abundance of good quality water.

Las Palmas Ranch is located entirely within Monterey County Flood Control and Water Conservation District Zones 2 and 2A. In a report to the Board of Supervisors on June 23, 1981, Robert Smith, District Engineer for that district, confirmed that water adequate for all proposed development in the River Road ADC area is readily available. Smith stated further that the proposed levels of development in the River Road ADC area do not pose any threat of degradation to the groundwater of the area. Consequently, this section of the specific plan will discuss only the proposed water delivery system.

Some smaller water systems in parts of the Toro Area have suffered from under-capitalization and piecemeal expansion. In contrast, one of northern California's largest and most reliable water utility companies, California Water Service Company, presently serves the River Road area and is ready and able to extend service to Las Palmas Ranch. Their system will provide both domestic and fire flow services to this project in accordance with the requirements of county and state regulatory agencies. If for some unforeseen reason California Water Service Company would not extend service to Las Palmas Ranch, adequate water can be developed easily from on-site wells to meet all state and county requirements through an incorporated mutual water company.

POLICIES

1. As the first priority the entire development must be served by a public utility water company providing domestic and fire flow in accordance with the requirements of State and County health and fire agencies. If a public utility water company satisfactory to the County is not feasible, then an incorporated mutual water company may perform this function.

2. Availability of water meeting the requirements of Policy No. 1 shall be demonstrated as to each increment of development prior to filing of a final subdivision map or issuance of any building permit for that increment of development.

3. Plans and specifications for domestic and fire flow water supply shall be submitted to local and state environmental health agencies for approval.

2 WASTEWATER

The concentrated development proposed for some areas of Las Palmas Ranch requires that a wastewater system be provided rather than utilizing individual septic tank systems.

The River Road ADC is within the area proposed for eventual service by the regional sewage system planned by the Monterey Regional Water Pollution Control Agency (MR WPCA).

However, the regional system, if constructed, would not be available until midway through the Las Palmas Ranch development. It appears that Las Palmas Ranch would be served best by a wastewater system that is capable of providing long-range service to the project, if necessary, but is also compatible with the regional system, if and when it becomes available.

A County Sanitation District or Community Service District is proposed to own and operate the collection, transmission, treatment and disposal facilities not owned or operated by MRWPCA.

POLICIES

1. Concentrated development within the project (i.e. development at greater than one unit per acre) shall be served by a wastewater treatment facility approved by local and state health agencies. Areas with lots larger than one acre in size may utilize septic tanks provided that appropriate soils tests and nitrate loading studies are submitted to and approved by the Health Department prior to approval of any tentative subdivision map and required permits are obtained from the Health Department.

2. The wastewater treatment facilities for Las Palmas Ranch shall be either an on-site facility approved by appropriate local and state health agencies, a consolidated facility with Spreckels, or connection with Monterey Regional Water Pollution Control Agency. If such facilities are owned or operated by a governmental entity not subject to control by the Monterey County Board of Supervisors, said entity's approval of all plans for such facilities shall be subject to the satisfaction of the Health Department. Location of any on-site facilities shall be subject to land use controls, and shall not conflict with any agricultural uses. Treatment facilities shall not be located north of River Road nor shall this area be used for effluent storage or disposal.

3. The Las Palmas Ranch wastewater treatment and disposal facilities should be designed to be compatible to be connected to the regional system proposed by Monterey Regional Water Pollution Control Agency.

4. A County Sanitation District, Community Services District, or other appropriate public entity meeting the requirements of the Public Works Department shall be formed prior to filing any final subdivision map to own and operate the collection, transmission, treatment and disposal facilities not owned or operated by MRWPCA.

5. A third party engineering consulting firm acceptable to both the developer and the County shall be employed by the County and paid for by the developer to review and approve the developer's plans for the wastewater treatment facilities.

6. A detailed wastewater management study for the entire project must be submitted to local and state health agencies for approval prior to final approval of the tentative map for the first increment of residential development. The study shall designate the type of public entity (county sanitation district, community services district or other entity) to be formed to own and operate the wastewater facilities, and whether such agency will be a county-operated agency or a non-county-operated agency.

7. Should an on-site wastewater treatment and disposal facility be abandoned in the future, the facility should be demolished and the land converted to agricultural or open space uses.

8. Availability to wastewater treatment and disposal facilities meeting the requirements of the foregoing policies shall be demonstrated as to each increment of development prior to filing of a final subdivision map or issuance of

any building permit for that increment of development. The developer must demonstrate that the wastewater facilities for initial increments of the project are capable of expansion to serve the entire project.

9. A discharge permit from the California Regional Water Quality Control Board, if required; any annexation agreements with Monterey Regional Water Pollution Control Agency, if appropriate; and all other permits (other than building permits and grading permits) necessary to construct and operate the wastewater facilities shall be obtained prior to acceptance of improvement plans, subdivision agreement or final subdivision map for the first increment of development in the project.

10. Wastewater shall not be permitted to flow, seep or drain into the Salinas River.

3. SCHOOLS

At buildout, Las Pal mas Ranch will generate approximately 400 K-8 and 200 9-12 grade students, at least in initial occupancy years. A review of this educational picture with the Spreckels Elementary School Board has been undertaken and the board has seen a ten acre parcel on the Las Palmas Ranch designated in this Specific Plan as an elementary school site, should the district need another school (see Figure D). The superintendent of the Salinas Union High School District wrote on May 27, 1981, that the high school has experienced about a 10% decline in enrollment from the Toro Area over the last five years and that the decline is expected to continue if not accelerate. Salinas High School has indicated ability to accommodate its share of student population from Las Palmas Ranch at existing facilities in Salinas.

Monterey County has enacted a school facilities fee/dedication ordinance for the purpose of providing a method of financing school facilities necessitated by new residential developments.

POLICIES

1. Dedicate an elementary school site, at least ten acres in size, as shown in Figure D.

2. Comply with the Monterey County school facilities fee/dedication ordinance.

4. FIRE PROTECTION

Fire protection to the River Road ADC is presently provided by the Salinas Rural Fire District from a station on Portola Drive just west of the interchange of River Road and Highway 68. This station houses a three-man engine company. Besides the pumper truck, two other pieces of equipment are kept at this station, a grass and brush truck and a tanker, the latter required for fires in areas with inadequate water systems. The station also has a paramedic emergency service unit.

According to the fire district, significant development in the River Road ADC may, at a future point, require the development and manning of a new station in the River Road area. The timing of such investment by the district and the staffing arrangement are dependent upon the pace and scale of overall development (at Las Palmas, Toro Vista, Vista Del Rio, and Indian Springs), and the outlook for volunteer manning of certain facilities.

POLICIES

1. Provision shall be made for necessary fire protection facilities.

5. POLICE PROTECTION

Police protection is provided to the area by the Monterey County Sheriff's Department operating from the headquarters facility in the county civic center in Salinas, approximately four to five miles from the site. The River Road area currently requires minimum usage of police services. According to the head of the patrol division, service needs are determined by the incidents of crime in an area rather than by the population. The River Road area is considered a low crime area and would be expected to remain so even with the development of Las Palmas Ranch. According to department sources, the addition of 2,770 people in the area would not require the initiation of a new beat and thus there would be no substantial increase in sheriff department costs as a result of the proposed project.

Policy.

1. Provision shall be made for necessary police protection.

CHAPTER III

THE REGULATORY FUNCTION

Government Code, Section 65451 requires that a specific plan shall include all regulations which shall be necessary or convenient for the systematic implementation of the plan. This Chapter III is intended to satisfy the requirements of section 65451 by discussing those existing and proposed regulatory functions which will be required of Monterey County in order to make the goals, objectives and policies of this specific plan a reality.

A. CEQA COMPLIANCE

The adoption of this specific plan is in itself a "project" which requires environmental assessment pursuant to the California Environmental Quality Act, Public Resources Code Section 21000 et seq ("CEQA"). With that in mind, the Board of Supervisors directed that an environmental impact report ("EIR") be prepared for this plan. The EIR addresses not only the proposed development of Las Palmas Ranch, but also the general plan amendment by which the River Road ADC was established.

Government Code, Section 65453(b), a portion of the specific plan law, provides that notwithstanding any other provision of law, no EIR or negative declaration need be filed for any residential project, including any subdivision or zoning change, which is undertaken pursuant to and in conformity with a specific plan for which an EIR has been certified. Thus, in the absence of substantial change (see Public Resources Code, Section 21166, and County Guidelines, Section 607) the EIR certified in connection with this Specific Plan serves as a "master" EIR for all of the residential development at Las Palmas Ranch.

Subsequent focused EIR's may be required for nonresidential aspects of the project to explore mitigation alternatives in detail. Supplemental EIRs will not be prepared for the residential development unless required by Government Code Section 65453 (b) and Public Resources Code Section 21166.

B. ZONING

The Las Palmas Ranch is presently in three zoning classifications: F-V-B-5; K-V-E-B-4; and SC/1-E-V. None of these classifications as presently applied is appropriate for the interim or ultimate land use regulation of the property.

1. Interim Zoning

Following approval of the specific plan, but prior to the filing of any subdivision map for the first increment of development, it would be appropriate to place the entire ranch into an interim or holding classification or classifications that would recognize its future use pursuant to the specific plan, but prevent the development of inconsistent uses prior to first increment subdivision. The agricultural land north of River Road should be retained in the F-V-B-5 (exclusive agriculture) classification. The balance

of the ranch should be classified "T" (transitional) or other appropriate holding classification which limits inconsistent interim uses but anticipates further rezoning.

2. Ultimate Zoning

The tentative subdivision map for each increment of development should be conditioned to require "follow-up" rezoning to a classification corresponding to the character and density of use specified for each of the lots or parcels included in that subdivision map. Single family lots larger than one acre ordinarily should be placed in "RR" (rural residential) classification. Lots of one acre or less proposed for the detached single family residential development ordinarily should be zoned "R-l-B-6".

Parcels proposed for condominium, townhouse ("PUD"), zero lot line, or other multifamily development, ordinarily should be placed in "ST" (special treatment), "R-1-S" (integrated single family), "R-2" (duplex), or "R- 4" (multifamily) classification, depending upon the nature and circumstances of each individual application. All commercial areas should be placed in "PC" (planned commercial) zoning. In the case of the Corey House, the "PC" zoning should be combined with the "HR" (historic resources) district to assure the protection, enhancement and perpetuation of the historic character of the structure. The "D" (design control) combining district should be applied to all areas proposed for structural improvement. Major open space areas should be placed in "O" (open space) zoning.

C. USE PERITS

All of the residential development proposed within areas zoned "ST" will require issuance of a conditional use permit. Residential development within the other zoning classifications may require a conditional use permit depending upon the character or density of the proposed development.

Commercial development under the "PC" zone will require both a general development plan covering the entire commercial complex; and one or more zoning permits for individual buildings or uses covered by the general development plan.

Whenever possible, use permit applications should be processed concurrently with subdivision or other corresponding procedures in order to reduce expense and delay both to the staff and to the developer.

D. SUBDIVISION

The Subdivision Map Act and the Monterey County Subdivision Ordinance define any division of land for purposes of sale, lease or financing as a subdivision requiring some form of local regulatory approval.

The process of actually subdividing the Las Palmas Ranch in accordance with this Specific Plan could follow a number of different routes depending upon marketing and economic conditions, the type and availability of development and

purchaser financing, and housing trends for both inclusionary and market rate housing. Both standard subdivisions and minor subdivisions may be utilized to implement this plan; and subdivisions for the purpose of both sale and financing may be required. In any event, it is apparent that the entire project will not be developed under a single tentative subdivision map.

The most foreseeable scenario is the submittal of a tentative subdivision map for a particular phase of the project. That tentative map may reflect the development of that phase in two or more increments of as few as twenty residential units.

ln the case of a "first generation" subdivision, the tentative subdivision application will be accompanied by a rezoning application, and if required by the new zoning, a use permit application.

In order to implement the goals and objectives of this plan to provide a broad mix of housing types and prices, two or more "generations" of subdivision may be required. The "first generation" subdivision, for example, may create a group of larger parcels with an assigned density in accordance with this Specific Plan, to be followed by "second generation" subdivisions of each "first generation" parcel to create the specific planned development (whether standard subdivision, multifamily, condominium, townhouse or other) thereon. Appropriate conditions should be applied at each stage of the subdivision process to assure that the objectives of this Specific Plan are carried out. Some "first generation" subdivisions may be conditioned to preclude any actual development until a "second generation" subdivision is approved in which case no exactions should be imposed upon the "first generation" subdivision.

Following approval of a tentative subdivision map, one or more minor subdivisions may be required, for example to allow the separate financing of one or more of the increments within the approved tentative maps, or to permit the sale of an increment to a joint venture developer or to a non-profit entity for the development of low or moderate income units. So long as the goals, objectives and policies of this plan are not subverted by the procedure the County should cooperate and assist in the phased and incremental subdivision of the project.

A number of means are available and should be used in connection with the subdivision process to reduce the ultimate cost of the housing units in Las Palmas Ranch.

1. Whenever possible, the subdivision approval process should be consolidated with corresponding zoning, use permit and similar procedures. In this way, staff, developer and public time and expense can be saved, and unnecessary delay avoided.

2. Optional or modified design and improvement standards should be permitted and encouraged where the liveability, convenience, or appearance of the project would be enhanced or where such design or standards would better achieve

the objectives of this Specific Plan and of the Monterey County Housing Plan to encourage the development of low or moderate income housing.

E. CONDITIONS OF APPROVAL

The Board of Supervisors at the time it approves this specific plan will adopt conditions of approval which will serve to supplement or amplify the goals, objectives and policies of this specific plan. If such conditions are imposed, they shall be deemed incorporated into and a part of this plan.

Conditions should also be imposed on tentative maps, use permits and zoning permits as required to implement the policies contained in this plan and to assure compliance with the terms of any development agreed utilized in connection with this Specific Plan.

F. MODIFICATIONS TO PLAN

Changes or modifications to this plan which do not substantially alter the nature of the uses, the population density or building intensity, or any of the goals, objectives or policies of this specific plan, shall be deemed ministerial and may be approved administratively. Any change or modification to this Plan which is not ministerial shall require approval by the Board of Supervisors of a specific plan amendment.

CHAPTER IV

NONREGULATORYIMPLEMENTATION

GOAL: To provide an innovative framework for private and public implementation of the facilities and services element of the Las Palmas Specific Plan.

DISCUSSION:

Full development of Las Palmas Ranch involves the construction, operation and maintenance of community facilities. These facilities include those serving community education, recreation, health and public safety functions. Limitations to the ability of existing public agencies to fund new public investment make it desirable to propose these developer-sponsored, nonregulatory implementation objectives and policies.

Development of Las Palmas Ranch may justify the use of assessment and service district financing in conformity with criterium 7 of Board resolution 83-121. Under California statutes, assessment districts (typically formed under the Acts of 1903, 1911, 1913 and 1915) have been employed to support initial financing of capital improvements, such as streets and flood control facilities. Service Districts (such as County Services Areas (-"CSA"); and Community Service Districts ("CSD") are commonly employed to provide a funding source for continuing programs, of operation and maintenance, such as parks and recreation programs, and police protection. Other special districts may be used to operate and maintain sanitation, water, lighting and like facilities.

The necessity to utilize any combination of the above districts will be governed by the timing and phasing of Las Palmas Ranch development, service levels to be established, the costs of constructing, operating and maintaining public facilities, and developer financing applied to these requirements. Rights and responsibilities of all involved witnesses will be established as the specific plan is approved and the Las Palmas Development Agreement is executed. Transfer of various properties or facilities from developer to homeowners' associations or public bodies also affects the extent to which private and public funds are required and employed.

The provision of public utility services to Las Palmas Ranch will be arranged via agreements between the developer and the serving utilities.

Elementary and high school education needs will be examined by the serving school districts (Spreckels Elementary and Salinas High School District) and met in accordance with district policies. New classroom construction at Las Palmas Ranch is at the discretion of Spreckels Elementary District.

The Las Palmas Ranch Specific Plan provides for nine hundred acres of land devoted to open space and natural recreation area, and twelve acres devoted to

mixed commercial/recreation/community uses. Ownership and maintenance of these facilities requires a special implementation approach.

The Las Palmas Ranch Specific Plan calls for restoration and maintenance of the Corey House and adjacent site area as a link with the property's heritage. Multipurpose use of the property is planned under developer ownership and control.

In summary, the policies following are designed to facilitate the timely identification of Las Palmas Ranch service and facilities needs, and the funding and provision of these required services and facilities within the overall phased development program. Applicable general objectives and specific policy statements follow:

GENERAL OBJECTIVES:

1. Arrange for the provision of adequate community services within approved areas of development concentration.

2. Provide for the development of adequate public facilities serving these areas of development concentration.

Minimize Monterey County operating and financing problems associated with provisions of these services and facilities.

A. ASSESSMENT AND SERVICE DISTRICT POLICIES

1. Appropriate assessment districts should be structured to supplement developer contributions and fully capitalize Las Palmas Ranch infrastructure and facilities requirements.

2. The impact of early project public improvement costs on housing costs should be reduced via the use of long-term assessment district bond financing.

3. A Las Palmas Ranch service district framework should be designed to adequately cover anticipated operating and maintenance costs for street lighting, street and flood control maintenance, parks, recreation facilities and the like.

4. A service district and assessment/bonding framework should be established to support Las Palmas Ranch capability to pay a necessary share of any future River Road ADC capital fund requirements for public protection (County Sheriff and Salinas Rural Fire Protection District) not yet determined.

5. Within the special district concept, a County sanitation district should be formed to own, operate and maintain the Las Palmas wastewater facilities, eliminating any disproportionate financial burden on regional wastewater systems and the County of Monterey.

6. Continuous monitoring and review of police protection needs at Las Palmas should be coordinated with the Monterey County Sheriff's Department.

7. The provision of any new operating funds or facilities for fire protection by the Salinas Rural Fire District should be implemented through the service district concept.

B. HOMEOWNER'S ASSOCIATION POLICIES

1. All areas and facilities to be owned in common should be transferred at appropriate intervals from developer to designated homeowners' associations or special districts.

2. The formation and operation of neighborhood, village (or similar) and master homeowners' associations should be implemented to receive, operate and finance properties to be held in common ownership.

3. Ownership and operation of public facilities should be accommodated within the facilities special service district (CSA, CSD, sanitation district, etc.).

4. An adequate legal and operating framework for resident homeowner associations and for ownerships of properties by service districts shall be developed.

APPENDIX

River Road Area of Development Concentration

General Plan Amendment

On March 22, 1983, the Board of Supervisors adopted an amendment to the Monterey County General Plan establishing the River Road Area of Development Concentration. This action and criteria becomes the basis for the formation of specific plans requiring any such plans in this area to be consistent with this action and meet the minimum requirements set forth in Board Resolution No. 83-121. The General Plan amendment is as follows:

BE IT FUR THER RESOLVED that the Board of Supervisors approves the following General Plan amendment:

A. Designates the River Road area as an Area of Development concentration;

B. The boundaries shall be those referred to the Planning Commission, as amended and as shown on the attached map, "River Road Area of Development Concentration dated March 22, 1983." The uses shall be those designated by and consistent with the General Plan for the area covered.

C. The development criteria for the Area of Development Concentration shall be as follows:

1. Existing or approved development within the River Road ADC shall be maintained or developed in accordance with existing or approved tentative or final subdivision maps, use permits or specific plans.

2. The basic residential density for the new major subdivision development within the River Road ADC shall be a maximum of one unit per gross developable acre except where topography, physical constraints or other factors would preclude this density. Development including septic systems shall not be allowed on slopes over 30%. Condominiums, town houses, zero lot line houses,

and other forms of clustered or multifamily housing, shall be considered within this basic density where adequate utilities are available; and shall be encouraged where such development will help to protect public viewsheds, natural resources or prime agricultural lands, or will facilitate providing housing for families of low or moderate income.

3. Developable acres within the ADC shall be determined by establishing the overall gross area and subtracting areas of cross-slope in excess of 30%; prime agricultural land, and any other areas constrained by physical or environmental reasons.

4. New residential subdivisions within the River Road ADC shall provide at least 15% of their units for families of low or moderate income.

5. The ADC shall contain a Development Incentive Zone (DIZ) of 10 acres and is to be developed at a maximum residential density of 10 units per acre.

6. Necessary public services and facilities in an ADC shall include, but not be limited to, police and fire protection, sewers, roads, road maintenance, erosion, flood control, drainage, recreation, emergency escape routes and elementary schools. Also, service and facility requirements for the ADC should be scaled to the nature and scope of the ADC.

7. New development within the River Road ADC shall be served by a public utility water system or an incorporated mutual water company providing domestic and fire flows in accordance with all requirements of state and county environmental health agencies. Provision of necessary public services may be addressed and provided for on an ADC-wide basis, based upon the County's determination including the need for service areas and assessment districts. The County may assist in these endeavors.

8. New residential subdivisions within the River Road ADC on lots of less than one acre shall be served by a community sewage treatment facility meeting all requirements of state and county environmental health agencies.

9. Adequate police and fire protection shall be available at the time of development.

10. Appropriate elementary school sites shall be dedicated.

11. In order to mitigate adverse impacts on significant view shed areas, the following standards shall be applied to new development within the River Road ADC:

a. Ridge top development shall be prohibited.

b. Low level exterior lighting, including streetlights, shall be utilized consistent with maintenance and public safety requirements.

c. Roads which are perpendicular to viewing areas or which involve excessive cut or fill shall be discouraged.

d. Visually obtrusive building materials and finishes shall be avoided.

e. Higher density housing units shall be clustered behind natural land forms or be visually compatible and unobtrusive.

f. Utilize mounding, informal massing or irregularly spaced trees, planting, and other overall landscaping treatment to screen development.

g. Preserve vegetation significant to maintain visual quality and to provide erosion control on sensitive slopes.

12. Erosion, siltation and drainage controls shall be implemented in order to enhance watershed management, to protect on site and riparian vegetation, to protect prime and productive agricultural land, to maximize retention and percolation of surface water on site and minimize hazards to development.

13. An irregular or meandering landscaped setback, with a minimum depth of 50', shall be established along the frontage of River Road.

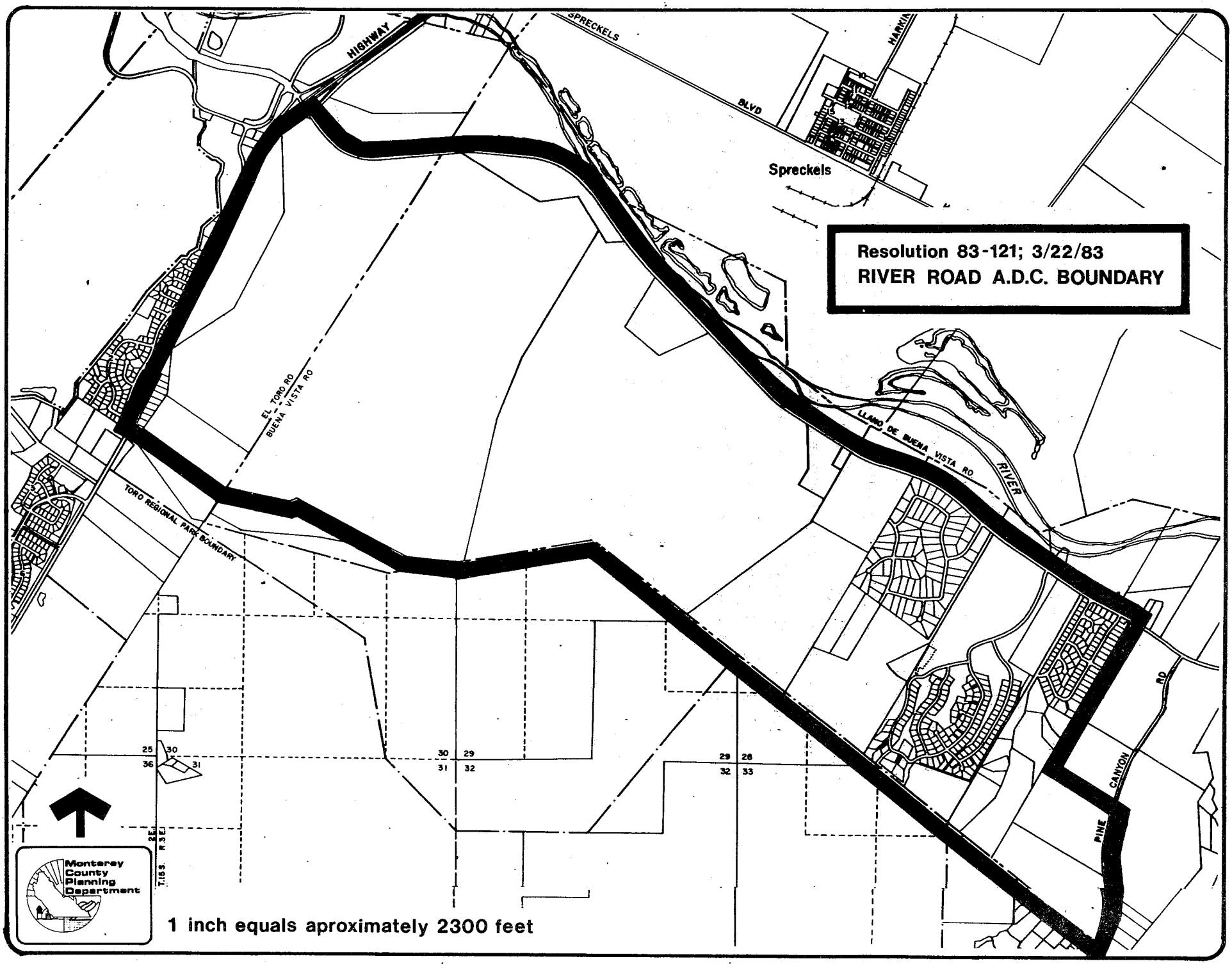
14. Provide centrally located commercial facilities appropriate to meet the convenience needs of residents of the River Road ADC. Such facilities shall be developed under general "Planned Commercial" or similar zoning which regulates uses, design and signing.

15. New residential subdivision within the River Road ADC shall provide usable open space and recreational facilities for the residents of the subdivision.

16. Significant archaeological and historical sites shall be preserved and protected as cultural resources. The Corey House should be restored and used for social, recreational and commercial purposes of a localized nature.

17. All new development within the River Road ADC shall provide detailed soils reports identifying sensitive and/or erodable soils. Such information shall be used to mitigate impacts and to insure the prevention of degradation and erosion of such sensitive soils and the degradation of agricultural lands adjacent to the ADC.

18. All run-off from such developments in the ADC shall be retained or directed so as to not adversely affect agricultural lands and farming operations north of River Road. This policy as well as the other policies herein shall insure the permanent preservation of agricultural lands adjacent to the ADC.


Resolution 83-121; 3/22/83
RIVER ROAD A.D.C. BOUNDARY
HIGHWAY
SPRECKELS
BLVD
HARKINS
Spreckels
EL TORO RD
BUENA VISTA RD
TORO REGIONAL PARK BOUNDARY
LLANO DE BUENA VISTA RD
RIVER
PINE CANYON RD
25
30
36
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33
T.16 S.
R.2 E.
R.3 E.
Monterey County Planning Department
1 inch equals aproximately 2300 feet

Exhibit D

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MINUTES
Toro Land Use Advisory Committee
Monday, October 23, 2023

1. Meeting called to order by: Weaver **at** 4 pm

2. Roll Call

Members Present: McMurtrie, Mueller, Gobets, Weaver, Bean and new member Tamara Schwartz

Members Absent: Keenan, Pyburn

3. Approval of Minutes: Postponed to end of meeting agenda

A. **July 24, 2023** minutes

Motion: by Bean: To approve the Original Minutes prepared by Bean (LUAC Member's Name)
Second: Weaver (LUAC Member's Name)

Ayes: 6 Mueller, McMurtrie, Gobets, Weaver, Schwartz and Bean

Noes: 0

Absent: 2 Keenan and Pyburn

Abstain:

4. Public Comments: The Committee will receive public comment on non-agenda items that are within the purview of the Committee at this time. The length of individual presentations may be limited by the Chair.

Shannon Lamberth asks "how is the LUAC formed and how does one apply? Anna Quenga, Planner, answered her questions and referred her to the County website.

5. Scheduled Item(s)

6. Other Items:

A) Preliminary Courtesy Presentations by Applicants Regarding Potential Projects (Refer to pages below)
B) Announcements

Meeting Adjourned: 5:45 pm

Minutes taken by: Bean

Action by Land Use Advisory Committee
Project Referral Sheet

Monterey County Housing & Community Development
1441 Schilling Place 2nd Floor
Salinas CA 93901
(831) 755-5025

Advisory Committee: Toro

1. **Project Name:** RIVER VIEW AT LAS PALMAS LLC
File Number: PLN150372
Project Location: AT THE END OF WOODRIDGE COURT, SALINAS
Project Planner: Zoe Zepp
Area Plan: Toro Area Plan
Project Description: An application for a Vesting Tentative Map and Use permit to allow an up-to 30 lot subdivision and a Use Permit to allow development on slopes exceeding 25 percent.

Was the Owner/Applicant/Representative present at meeting? Yes X No _____

(Please include the names of the those present)

Tony Lombardo, attorney representing applicant; Steve Jackson; Jerry Crawford; Andrea Zulberti; Nancy Montana; Dave Tucker; Otavio Bernardo; Stephen Hurst; Steve Vasquez; Christian Dreyer; Shannon Lamberth; Joel Panzer; Zermin Vasquez; Rosa Izquierdo; Philip Pearman; Brittany Schloss, Permit facilitator for Abalone Creek Ranch.

Was a County Staff/Representative present at meeting? Zoe Zepp (Name)

PUBLIC COMMENT:

Name	Site Neighbor?		Issues / Concerns (suggested changes)
	YES	NO	
Shannon Lamberth	X		The Master Plan (at the time of her home purchase) called for 5 homes maximum on this property. Open spaces will be drastically impacted by this density. No additional egress will be provided.
Belinda Tolubin			She wants the plans to be displayed (as on an overhead projector) for all to see. Plans previously provided at meetings are now only on line.
Jerry Crawford	X		Objects to disturbing virgin land to build this. It liberates Valley Fever virus in the soil and it spreads in the dust. He thinks this is quite a stretch from the 5 homes in the Master Plan. Two vehicles per home adds over 50 cars while the road and gates are unimproved. This provides profits for developer at the expense of residents' health and safety.

Steve Hirsch, HOA V.P.	X		Strongly in favor of this plan. It is a great improvement over the previous plan for an assisted living facility. He believes the County will hold the developer accountable.
Steve Jackson	X		Asks if there will be a second road added for egress?
Otavio Bernardo	X		Was opposed previously but now is OK with the project and says part of it will be affordable housing. He feels it provides needed housing and the owner has the right to build. At the timer of the River fire, the evacuation of all residents was not a problem.
Christian Dreyer	X		Does this project allow rentals? Will the value of these homes be comparable to existing homes?
Shannon Lamberth	X		Wants to know if project will allow variation from requirements on existing homes?
Mark Vucina, local custom builder			Answering last few questions says that the new houses will increase existing home values. They will be semi-custom and cost at least $200-500 per sq. ft.
Linda Ipong	X		Will the homes be two story or one story?
Steve Jackson	X		Will the CCRs of the HOA apply to these new homes?
Tony Lombard, project attorney			In response to questions, he explained that the project is for 26 lots and will contribute around one million dollars to the county in lieu of building affordable units on site. This number of lots is preferred by neighbors and building affordable housing on this site is problematic- it would not be affordable in the current market. The money will go to CHISPA which builds affordable housing in the Salinas Valley. If the HOA votes in the new properties, they will be subject to the CCRs and the fees.
Andrea Zulberti (project owner)			Says they thought that the in lieu option is a better option for everyone
Zoe Zepp, project planner			The fire department approved this project. She has no information on Valley fever and the traffic report said there would be no significant impacts. This project includes an amendment to the Master Plan increasing the number of lots.

LUAC AREAS OF CONCERN

Concerns / Issues	Policy/Ordinance Reference	Suggested Changes -

(e.g. site layout, neighborhood compatibility; visual impact, etc)	(If Known)	to address concerns (e.g. relocate; reduce height; move road access, etc)
Bean concerned that so many projects want permits to build on slopes exceeding 25%, even though it is prohibited by the 2010 General Plan. Everyone says there is no other option and the prohibition becomes worthless.	Use Permit allowing development on slopes exceeding 25%	Lombardo says only the roadway is over 25% and only in a certain area. The building envelopes on the proposed lots will not be over 25%
Gobets says he worked for years against the previous plan for an assisted living facility and feels that this project is a great improvement which he can support		
+		

ADDITIONAL LUAC COMMENTS

Weaver states his concerns and wants to see a height limit of 20 feet and one gallon oak replacement trees in the ratio of 3:1. A dedicated scenic easement on all remaining land. The County to review and obey the Specific Plan for Las Palmas regarding erosion, slope stability, on site parking, noise control during building and a traffic plan. A B-6 overlay and implementation of the conditions in the letter from Christine Kemp of April 27, 2022 (attached)

RECOMMENDATION:

Motion by: Weaver (LUAC Member's Name)

Second by: Mueller (LUAC Member's Name)

X Support Project as proposed with the 6 conditions listed by Weaver (above)

_____ Support Project with changes

_____ Continue the Item

Reason for Continuance: _____

_____

Continued to what date: _____

AYES: 6 Mueller, McMurtrie, Gobets, Weaver, Schwartz and Bean

NOES: 0

ABSENT: 2 Keenan and Pyburn

ABSTAIN: _____

Action by Land Use Advisory Committee
Project Referral Sheet

Monterey County Housing & Community Development
1441 Schilling Place 2nd Floor
Salinas CA 93901
(831) 755-5025

Advisory Committee: Toro

2. **Project Name:** PEDRAZZI JAMES N TR ET AL AND PEDRAZZI PETER N TR ET AL
File Number: PLN210158
Project Location: 800 & 808 RIVER RD, SALINAS, CA 93908
Project Planner: Kayla Nelson
Area Plan: Toro Area Plan
Project Description: An application for a Standard Subdivision Tentative Map to allow division of a 380.95 acre parcel, 38.54 acre parcel and 5.78 acre parcel under Williamson Act Contract into six (6) parcels ranging in size from Parcel A of 11.08 acres, Parcel B of 42.52 acres, Parcel C of 69.30 acres, Parcel D of 88.27 acres, Parcel E of 40.04 acres and Remainder Parcel F of 174.49 acres, respectively.

Was the Owner/Applicant/Representative present at meeting? Yes X No _____

(Please include the names of the those present)

See previous project for names of those present; Joel Panzer, Planning consultant representing the applicant

Was a County Staff/Representative present at meeting? Anna Quenga (for Nelson)
(Name)

PUBLIC COMMENT: NONE

Name	Site Neighbor?		Issues / Concerns (suggested changes)
	YES	NO	

LUAC AREAS OF CONCERN: NONE

Concerns / Issues (e.g. site layout, neighborhood compatibility; visual impact, etc)	Policy/Ordinance Reference (If Known)	Suggested Changes - to address concerns (e.g. relocate; reduce height; move road access, etc)

ADDITIONAL LUAC COMMENTS

RECOMMENDATION:

Motion by: Weaver (LUAC Member's Name)

Second by: McMurtrie (LUAC Member's Name)

X Support Project as proposed

_____ Support Project with changes

_____ Continue the Item

Reason for Continuance: _____

Continued to what date: _____

AYES: 6 McMurtrie, Mueller, Schwartz, Gobets, Weaver and Bean

NOES: 0

ABSENT: 2 Keenan and Pyburn

ABSTAIN: _____

Action by Land Use Advisory Committee
Project Referral Sheet

Monterey County Housing & Community Development
1441 Schilling Place 2nd Floor
Salinas CA 93901
(831) 755-5025

Advisory Committee: Toro

3.

Project Name: CV VISTA FARMS LLC AND DARRIGO BROS CO
File Number: PLN220367
Project Location: 20100 HARRIS CT, SALINAS, CA 93908
Project Planner: Kayla Nelson
Area Plan: Toro Area Plan & Greater Salinas Area Plan

Project Description: A Lot Line Adjustment between two (2) legal lots of record: Parcel 1 (288.65 acres; under Williamson Act Contract) and Parcel 2 (12.13 acres), resulting in two (2) lots containing 278.87 acres (Parcel A) and 21.91 acres (Parcel B), with at least 90 percent of land under the former Contract remaining under the amended Williamson Act Contract.

Was the Owner/Applicant/Representative present at meeting? Yes X No _____

(Please include the names of the those present) Jasmine Vasquez, daughter of owner; Philip Herman, surveyor who prepared the map

Was a County Staff/Representative present at meeting? Anna Quenga (for Nelson)_____ (Name)

PUBLIC COMMENT: None

Name	Site Neighbor?		Issues / Concerns (suggested changes)
	YES	NO	

LUAC AREAS OF CONCERN: None

Concerns / Issues (e.g. site layout, neighborhood compatibility; visual impact, etc)	Policy/Ordinance Reference (If Known)	Suggested Changes - to address concerns (e.g. relocate; reduce height; move road access, etc)

ADDITIONAL LUAC COMMENTS

_____

_____

_____

_____

RECOMMENDATION:

Motion by: Mueller (LUAC Member's Name)

Second by: Weaver (LUAC Member's Name)

X Support Project as proposed

_____ Support Project with changes

_____ Continue the Item

Reason for Continuance: _____

_____

Continued to what date: _____

AYES: 6 McMurtrie, Mueller, Schwartz, Gobets, Weaver and Bean

NOES: 0

ABSENT: 2 Keenan and Pyburn

ABSTAIN: _____

Exhibit E

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MONTEREY COUNTY
RESOURCE MANAGEMENT AGENCY
Carl P. Holm, AICP, Director

LAND USE & COMMUNITY DEVELOPMENT | PUBLIC WORKS & FACILITIES | PARKS
1441 Schilling Place, 2nd Floor (831)755-5025
Salinas, California 93901 www.co.monterey.ca.us/rma

FILED
STEPHEN L.
MONTEREY CO
CLERK
DEPUTY

NOTICE OF AVAILABILITY

DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT (DRAFT SEIR)

PROJECT TITLE: **RIVER VIEW AT LAS PALMAS ASSISTED LIVING SENIOR FACILITY (PLN150372; SCH # 2017031025)**

Notice is hereby given that the County of Monterey is seeking written comment on the Draft Subsequent Environmental Impact Report (Draft SEIR) on the River View at Las Palmas Assisted Living Senior Facility project (RMA-Planning File No. PLN150372; SCH # 2017031025) in accordance with the California Environmental Quality Act. The public review period will begin on March 12th and end on April 25th, 2018. This review period is established for the purpose of receiving written comments on the accuracy and adequacy of the Draft SEIR together with other information relative to the environmental effect of the project.

PROJECT LOCATION: **THE PROPERTY IS LOCATED AT THE END OF WOODRIDGE COURT, LAS PALMAS RANCH SUBDIVISION (ASSESSOR'S PARCEL NUMBER 139-211-035-000), SALINAS, TORO AREA PLAN.**

PROJECT DESCRIPTION:
The proposed project includes a Specific Plan Amendment, Use Permit, and Design Approval for the construction and operation of a senior assisted living facility and associated site improvements on an approximately 15.74-acre site at the location referenced above. The facility would consist of the following components:

- 13 "casitas" providing 26 units and up to 42 beds. The proposed structures are single-story and range in size from approximately 1,500 to 3,800 square feet. These units are intended to serve seniors who may require a moderate level of daily services, such as meals, maintenance and cleaning, and shuttle service. While services and assistance are available to occupants of these units, occupants may maintain a moderate degree of independence, such as preparing their own meals and operating their own vehicles.

- An approximately 43,400 square-foot, two-story assisted living facility consisting of 40 units and up to 52 beds. The assisted living facility would provide a wide range of assistance for seniors, including meals, medical assistance and transportation.

- An approximately 38,800 square-foot, three-level memory care facility serving seniors who require a full range of services and assistance. The memory care facility would include 39 units and up to 48 beds.

It is anticipated that the facility will have 92 employees when operating at maximum capacity, with shifts varying between 12 and 21 employees at any one time.

LEAD AGENCY: **COUNTY OF MONTEREY RESOURCE MANAGEMENT AGENCY - PLANNING**

ADDRESSES WHERE A COPY OF THE DRAFT SEIR IS AVAILABLE FOR REVIEW:

County of Monterey
RMA-Planning
1441 Schilling Place,
2nd Floor
Salinas, CA 93901
(831) 755-5025

Documents referenced in the Draft SEIR are available at Monterey County RMA-Planning at the address listed above.

PUBLIC REVIEW PERIOD: **MARCH 12 THROUGH APRIL 25, 2018**

POTENTIAL SIGNIFICANT ENVIRONMENTAL EFFECTS:
The DEIR identifies impacts in the following resource areas that are either less than significant or are significant but can be mitigated to a less than significant level: Aesthetics, Agricultural & Forest Resources, Air Quality, Biological Resources, Cultural Resources, Geology & Soils, Greenhouse Gas Emissions, Hazardous Materials, Surface Hydrology, Mineral Resources, Noise, Public Services, Recreation, Solid Waste, Wastewater, and Water Supply.

The DEIR identifies impacts in the following resource areas that are significant and cannot be mitigated to a less than significant level: Transportation

Public hearings will be held, subsequent to the public review period, at a time and place to be specified by legal advertisement in a local newspaper of general circulation. If you would like to be notified of the hearings or would like additional information please contact:

Joseph (Joe) Sidor, Associate Planner
Monterey County
Resource Management Agency – Planning
1441 Schilling Place, 2nd Floor
Salinas, CA 93901
Phone: (831) 755-5025
E-mail: sidorj@co.monterey.ca.us

We welcome your comments during the public review period. You may submit your comments in hard copy to the name and address above. The Agency also accepts comments via e-mail or facsimile but requests that you follow these instructions to ensure that the Agency has received your comments. To submit your comments by e-mail, please send a complete document including all attachments to: ceqacomments@co.monterey.ca.us

An e-mailed document should contain the name of the person or entity submitting the comments and contact information such as phone number, mailing address and/or e-mail address, and include any and all attachments referenced in the e-mail. To ensure a complete and accurate record, we request that you also provide a follow-up hard copy to the name and address listed above. If you do not wish to send a follow-up hard copy, then please send a second e-mail

requesting confirmation of receipt of comments with enough information to confirm that the entire document was received. If you do not receive e-mail confirmation of receipt of comments, then please submit a hard copy of your comments to ensure inclusion in the environmental record or contact the Agency to ensure the Agency has received your comments.

Facsimile (fax) copies will be accepted with a cover page describing the extent (e.g., number of pages) being transmitted. A faxed document must contain a signature and all attachments referenced therein. Faxed documents should be sent to the contact noted above at **(831) 757-9516**. To ensure a complete and accurate record, we request that you also provide a follow-up hard copy to the name and address listed above. If you do not wish to send a follow-up hard copy, then please contact the Agency to confirm that the entire document was received.

The Draft EIR is available on CD for purchase from Monterey County RMA-Planning at the above address. The documents are also available on the County website at: http://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency/planning

Planning for Success.

DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

RIVER VIEW AT LAS PALMAS ASSISTED LIVING SENIOR FACILITY

STATE CLEARINGHOUSE # 2017031025

PREPARED FOR

River View at Las Palmas LLC

January 29, 2018

EMC PLANNING GROUP INC.
A LAND USE PLANNING & DESIGN FIRM
301 Lighthouse Avenue Suite C Monterey California 93940 Tel 831-649-1799 Fax 831-649-8399
www.emcplanning.com

TABLE OF CONTENTS

1.0 INTRODUCTION 1-1

1.1 Purpose for Preparing the EIR 1-1

1.2 Methodology 1-1

1.3 EIR Process 1-3

1.4 Terminology 1-6

2.0 SUMMARY 2-1

2.1 Proposed Project Summary 2-1

2.2 Summary of Significant Impacts and Mitigation Measures 2-2

2.3 Areas of Known Controversy 2-2

2.4 Summary of Alternatives 2-5

2.5 Comparison of Alternatives 2-7

3.0 ENVIRONMENTAL SETTING 3-1

3.1 Project Site and Vicinity Setting 3-1

3.2 Baseline Conditions 3-2

3.3 Regional Setting 3-2

3.4 Consistency with Applicable Plans 3-12

4.0 PROJECT DESCRIPTION 4-1

4.1 Project Objectives 4-1

4.2 Project Characteristics 4-1

4.3 Intended Uses of the EIR 4-20

5.0 AESTHETICS 5-1

5.1 Environmental Setting 5-1

5.2 Regulatory Setting 5-2

5.3 Thresholds or Standards of Significance 5-23

5.4 Environmental Impact Analysis 5-23
5.5 Impact Summary and Mitigation Measures 5-30

6.0 AIR QUALITY 6-1
6.1 Environmental Setting 6-1
6.2 Regulatory Setting 6-9
6.3 Thresholds or Standards of Significance 6-15
6.4 Environmental Impact Analysis 6-16
6.5 Impact Summary and Mitigation Measures 6-20

7.0 BIOLOGICAL RESOURCES 7-1
7.1 Environmental Setting 7-1
7.2 Regulatory Setting 7-17
7.3 Thresholds or Standards of Significance 7-21
7.4 Environmental Impact Analysis 7-22
7.5 Impact Summary and Mitigation Measures 7-22

8.0 GREENHOUSE GAS EMISSIONS 8-1
8.1 Environmental Setting 8-1
8.2 Regulatory Setting 8-8
8.3 Thresholds or Standards of Significance 8-16
8.4 Environmental Impact Analysis 8-20
8.5 Impact Summary and Mitigation Measures 8-22

9.0 TRANSPORTATION & TRAFFIC 9-1
9.1 Environmental Setting 9-1
9.2 Regulatory Setting 9-4
9.3 Thresholds or Standards of Significance 9-9
9.4 Environmental Impact Analysis 9-11
9.5 Impact Summary and Mitigation Measures 9-23

10.0 WATER SUPPLY 10-1
10.1 Environmental Setting 10-1
10.2 Regulatory Setting 10-7
10.3 Thresholds or Standards of Significance 10-10
10.4 Environmental Impact Analysis 10-11
10.5 Impact Summary and Mitigation Measures 10-13

11.0 EFFECTS NOT FOUND TO BE SIGNIFICANT 11-1
11.1 CEQA Requirements 11-1
11.2 Agricultural/Forest Resources 11-1
11.3 Cultural Resources 11-1
11.4 Geology & Soils 11-2
11.5 Hazardous Materials 11-2
11.6 Surface Hydrology 11-5
11.7 Mineral Resources 11-7
11.8 Noise 11-7
11.9 Public Services 11-8
11.10 Recreation 11-9
11.11 Solid Waste 11-9
11.12 Wastewater 11-10

12.0 ENERGY 12-1
12.1 CEQA Requirements 12-1
12.2 Methodology 12-1
12.3 Energy Setting 12-1
12.4 Energy Regulatory Setting 12-2
12.5 Projected Energy Consumption 12-6
12.6 Guidance for Energy Efficiency/Conservation 12-7
12.7 Conclusion 12-8

13.0 CUMULATIVE IMPACTS 13-1
13.1 CEQA Requirements 13-1
13.2 Cumulative Development Scenario 13-2
13.3 Cumulative Impacts and the Proposed Project's Contribution 13-3

14.0 GROWTH INDUCING 14-1
14.1 CEQA Requirements 14-1
14.2 Economic Growth Inducement 14-1
14.3 Removing Impediments to Growth 14-2
14.4 Population Growth Inducement 14-2

15.0 SIGNIFICANT UNAVOIDABLE IMPACTS 15-1
15.1 Summary of Significant Unavoidable Impacts 15-1

16.0 IRREVERSIBLE IMPACTS 16-1
16.1 CEQA Requirements 16-1
16.2 Proposed Project Effects 16-1

17.0 ALTERNATIVES 17-1
17.1 CEQA Requirements 17-1
17.2 Alternatives Considered 17-1
17.3 Alternatives Considered But Rejected 17-9
17.4 Comparison of Alternatives 17-9

18.0 DOCUMENT AND WEB SOURCES 18-1

19.0 REPORT PREPARERS 19-1

Appendices

Appendix A Las Palmas Ranch Specific Plan and Final EIR

Appendix B Notice of Preparation and NOP Comment Letters

Appendix C California Emissions Estimator Model Results

Appendix D Higgins Traffic Report

Appendix E Cal Water Can and Will Serve Letter

Appendix F Landset Geotechnical Report

Appendix G CalAm Can and Will Serve Letter

Figures

Figure 3-1 Project Location 3-3

Figure 3-2 Aerial Photograph 3-5

Figure 3-3 Surrounding Uses 3-7

Figure 3-4 Project Site Photos 3-9

Figure 4-1 Site Plan 4-3

Figure 4-2 A Unit Casitas 4-7

Figure 4-3 B Unit Casitas 4-9

Figure 4-4 C Unit Casitas 4-11

Figure 4-5 Assisted Care Facility 4-13

Figure 4-6 Memory Care Facility 4-15

Figure 5-1 Viewpoints of Site 5-3

Figure 5-2 Public Viewpoint 1 5-5

Figure 5-3 Public Viewpoint 2 5-7

Figure 5-4 Public Viewpoint 3 5-9

Figure 5-5 Public Viewpoint 4 5-11

Figure 5-6 Public Viewpoint 5 5-13

Figure 5-7 Public Viewpoint 6 5-15

Figure 5-8 Public Viewpoint 7 5-17

Figure 5-9 Visual Simulation from State Route 68 5-25

Figure 5-10 Visual Simulation from Reservation Road 5-27

Figure 7-1 Habitat Map 7-3

Figure 9-1 Project Trip Distribution 9-13

Figure 9-2 Project Trip Generation....9-15
Figure 9-3 AM & PM Peak Hour Volumes and Project Trip Assignment....9-17
Figure 9-4 Intersection Levels of Service....9-19
Figure 11-1 Project Site Slopes....11-3

Tables

Table 2-1 Significant Impacts and Mitigation Measure Summary....2-3
Table 3-1 Policy Consistency Review (Las Palmas Ranch Specific Plan, Monterey County 2010 General Plan, Toro Area Plan)....3-13
Table 6-1 Common Air Pollutants....6-3
Table 6-2 Typical Non-road Engine Emissions Standards (g/bhp-hr)....6-6
Table 6-3 North Central Coast Air Basin Attainment Status Designations....6-8
Table 6-4 Summary of Ambient Air Quality Data (2013-2015)....6-8
Table 6-5 Federal and State Ambient Air Quality Standards....6-10
Table 6-6 CalEEMod Operational Modeling Results, Winter and Summer Emissions (Pounds per Day)....6-19
Table 7-1 Special-Status Plant Species with Potential to Occur in Vicinity....7-6
Table 7-2 Special-Status Wildlife Species with Potential to Occur in Vicinity....7-11
Table 8-1 GHG Types and Their Contribution to Global Warming....8-5
Table 8-2 GHG Global Warming Potentials....8-6
Table 8-3 1990 California Greenhouse Gas Inventory for Residential Land Use Related Emissions Sectors....8-18
Table 8-4 Unmitigated 2020 Operational Phase GHG Emissions (MT/year)....8-21
Table 9-1 Existing and Existing Plus Project Traffic Volumes....9-22
Table 10-1 River View at Las Palmas Potable Water Demand Estimate1, 2....10-11
Table 10-2 Projected, Existing, and Proposed Las Palmas Ranch Water Use....10-12
Table 17-1 Project Alternatives Summary....17-9

TABLE OF CONTENTS

1.0 INTRODUCTION.....1-1

1.1 Purpose for Preparing the EIR..... 1-1

1.2 Methodology..... 1-1

1.3 EIR Process..... 1-3

1.4 Terminology..... 1-6

1.0 Introduction

1.1 Purpose for Preparing the EIR

Monterey County, acting as the lead agency, has determined that the River View at Las Palmas Assisted Living Senior Facility (hereinafter "proposed project") could possibly result in significant adverse environmental impacts. After discussions with the County, the Project Applicants voluntarily offered to prepare an environmental impact report (EIR) to evaluate these possible significant adverse environmental impacts and to identify appropriate mitigations.

An Administrative Draft (ADEIR) was prepared by EMC Planning Group (EMC) and submitted to the County of Monterey, using available information from private and public sources noted herein, as well as information generated by EMC through field investigation.

Upon submittal of the ADEIR from EMC, Monterey County assumed control of the processing and content of the EIR and the subsequent EIR represents the independent judgment of Monterey County. This EIR has been prepared in compliance with the California Environmental Quality Act (CEQA) of 1970, as amended, to inform public decision makers and their constituents of the environmental impacts of the proposed project. In accordance with CEQA guidelines, this report describes both beneficial and adverse impacts generated by the proposed project and suggests measures for mitigating significant adverse environmental impacts resulting from the proposed project.

1.2 Methodology

General

This EIR has been prepared by Monterey County in accordance with CEQA and its implementing guidelines, using an interdisciplinary approach. The county has the discretionary authority to review and approve the proposed project. This EIR is an informational document that is intended to inform the decision makers and their constituents, as well as responsible and trustee agencies of the environmental impacts of the proposed project and to identify feasible mitigation measures that would avoid or reduce the severity of the impacts. The lead agency is required to consider the information contained in this EIR prior to taking any discretionary action to approve the proposed project.

This EIR has been prepared using available information from private and public sources noted herein, as well as information generated through field investigation by EMC Planning Group and other technical experts.

The purpose of an EIR is to identify a project's significant environmental effects, to indicate the manner in which those significant effects can be mitigated or avoided, and to identify alternatives to the proposed project.

An EIR is an objective public disclosure document that takes no position on the merits of the proposed project. Therefore, the findings of this EIR do not advocate a position "for" or "against" the proposed project. Instead, the EIR provides information on which decisions about the proposed project can be based. This EIR has been prepared according to professional standards and in conformance with legal requirements.

Subsequent EIR

In accordance with the Las Palmas Ranch Specific Plan (Chapter III, The Regulation Function, A. CEQA Compliance), this EIR is a subsequent EIR that is required for the project to explore mitigation alternatives in detail. The original Las Palmas Ranch Specific Plan and Final EIR are hereby incorporated by reference and are included in Appendix A of this EIR.

Emphasis

This draft EIR focuses on the significant effects on the environment in accordance with CEQA Guidelines section 15143. The significant effects are discussed with emphasis in proportion to their severity and probability of occurrence.

Forecasting

In accordance with CEQA Guidelines section 15144, preparing this draft EIR necessarily involved some degree of forecasting. While foreseeing the unforeseeable is not possible, the report preparers and technical experts used best available efforts to find out and disclose all information that reasonably and foreseeably can be disclosed.

Speculation

If, after thorough investigation, the report preparers in consultation with the lead agency determined that a particular impact is too speculative for evaluation, the conclusion is noted, and the rationale for how the conclusion was reached, and the issue is not discussed further (CEQA Guidelines section 15145).

Degree of Specificity

In accordance with CEQA Guidelines section 15146, the degree of specificity in this draft EIR corresponds to the degree of specificity involved in the proposed project. An EIR on a construction project will necessarily be more detailed in the specific effects of the project than

will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy. The proposed project is a construction project and therefore, the analysis in this draft EIR provides a high degree of specificity.

Technical Detail

The information contained in this draft EIR includes summarized technical data, maps, plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public, pursuant to CEQA Guidelines section 15147. Placement of highly technical and specialized analysis and data is included as appendices to the main body of the draft EIR. Appendices to this draft EIR are included on a CD on the inside, back cover.

Citation

In accordance with CEQA Guidelines section 15148, preparation of this draft EIR was dependent upon information from many sources, including engineering reports and scientific documents relating to environmental features. If the document was prepared specifically for the proposed project, the document is included in the technical appendices discussed above. Documents that were not prepared specifically for the proposed project, but contain information relevant to the environmental analysis of the proposed project, are cited but not included in this draft EIR. This draft EIR cites all documents used in its preparation including, where appropriate, the page and section number of any technical reports that were used as the basis for any statements in the draft EIR.

1.3 EIR PROCESS

There are several steps required in an EIR process. The major steps are briefly discussed below.

Notice of Preparation

CEQA Guidelines section 15082 describes the purpose, content and process for preparing, circulating and facilitating early public and public agency input on the scope of an EIR. CEQA Guidelines section 15375 defines a notice of preparation as:

> …a brief notice sent by the Lead Agency to notify the Responsible Agencies, Trustee Agencies, the Office of Planning and Research, and involved federal agencies that the Lead Agency plans to prepare an EIR for the project. The purpose of the notice is to solicit guidance from those agencies as to the scope and content of the environmental information to be included in the EIR.

A notice of preparation was prepared for the proposed project and circulated for 30 days March 7, 2017 to April 7, 2017, as required by CEQA. The notice of preparation, as well as comments received from agencies, organizations, and private individuals, are included in Appendix B.

Draft EIR

Contents

This EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency is required to consider the information in the EIR along with other information which may be presented to the agency. CEQA Guidelines Article 9 requires a draft EIR contain the following information:

- Table of Contents;
- Summary;
- Project Description;
- Environmental Setting;
- Consideration and Discussion of Environmental Impacts;
- Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects;
- Consideration and Discussion of Alternatives to the Proposed Project;
- Effects not found to be Significant;
- Organization and Persons Consulted; and
- Discussion of Cumulative Impacts.

The detailed contents of this draft EIR are outlined in the table of contents.

Public Review

This draft EIR will be circulated for a 45-day public review period. All comments addressing environmental issues received on the draft EIR will be addressed in the final EIR. CEQA Guidelines section 15024(a) states that in reviewing a draft EIR, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the

adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.

CEQA Guidelines section 15024(d) states that reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to section 15064, an effect shall not be considered significant in the absence of substantial evidence.

Final EIR

Contents

In accordance with CEQA Guidelines section 15132, the final EIR will provide the following:

- List of persons, organizations, and public agencies commenting on the draft EIR;
- Comments received on the draft EIR;
- Responses to significant environmental points raised in comments; and
- Revisions that may be necessary to the draft EIR based upon the comments and responses.

According to CEQA Guidelines section 15024(a), when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR. The final EIR and the draft EIR will constitute the entire EIR.

Certification

CEQA Guidelines section 15088 requires the lead agency to provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an EIR.

CEQA Guidelines section 15090 requires lead agencies to certify the final EIR prior to approving a project. The lead agency shall certify that the final EIR has been completed in compliance with CEQA, the final EIR was presented to the decision-making body of the lead agency and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project, and that the final EIR reflects the lead agency's independent judgment and analysis.

1.4 TERMINOLOGY

Characterization of Impacts

This EIR uses the following terminology to denote the significance of environmental impacts.

No Impact

"No impact" means that no change from existing conditions is expected to occur.

Adverse Impact

A "less-than-significant impact" is an adverse impact, but would not cause a substantial adverse change in the physical environment, and no mitigation is required.

A "significant impact" or "potentially significant impact" would, or would potentially, cause a substantial adverse change in the physical environment, and mitigation is required.

A "less-than-significant impact with implementation of mitigation measures" means that the impact would cause no substantial adverse change in the physical environment if identified mitigation measures are implemented.

A "significant and unavoidable impact" would cause a substantial change in the physical environment and cannot be avoided if the project is implemented; mitigation may be recommended, but will not reduce the impact to less-than-significant levels.

Beneficial Impact

A "beneficial impact" is an impact that would result in a decrease in existing adverse conditions in the physical environment if the project is implemented.

Abbreviations and Acronyms

Numerous acronyms are used in this EIR. The following list is provided as a quick reference to assist readers.

AB	Assembly Bill
ADA	Americans with Disabilities Act
AF	Acre-feet
AFY	Acre-feet per year
AMBAG	Association of Monterey Bay Area Governments
BMPs	Best Management Practices
CalEEMod	California Emissions Estimator Model

CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRHR	California Register of Historic Places
CRLF	California Red-legged Frog
CTS	California Tiger Salamander
CUPA	Certified Unified Program Agencies
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EMFAC	Emission Factors Modeling Program
EMS	Emergency Medical Services
EPA	United States Environmental Protection Agency
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FIRMS	Flood Insurance Rate Map
GCC	Global Climate Change
GHG	Greenhouse Gas Emissions
HazMat	Hazardous Materials
LAFCO	Local Agency Formation Commission
LOS	Level of Service
MBTA	Migratory Bird Treaty Act

MGD	Million Gallons per Day
MMT	Million Metric Tons
MT	Metric Tons
MWh	Megawatt Hours
NPDES	National Pollutant Discharge Elimination System
NWP	Nationwide Permit
OCEN	Ohlone/Costanoan-Esselen Nation
PCBMPs	Post-Construction Best Management Practices
PG&E	Pacific Gas and Electric Company
RoadMod	Road Construction Emissions Model
RPS	California Renewable Portfolio Standard Program
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SGMA	Sustainable Groundwater Management Act
SR	California State Route
SVGB	Salinas Valley Groundwater Basin
SWDS	Storm Water Design Standards
SWMP	Storm Water Management Plan
SWPPP	Storm Water Pollution Prevention Program
SWRCB	State Water Resources Control Board
TAMC	Transportation Agency for Monterey County
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey

TABLE OF CONTENTS

2.0 SUMMARY 2-1

2.1 Proposed Project Summary 2-1

2.2 Summary of Significant Impacts and Mitigation Measures 2-2

2.3 Areas of Known Controversy 2-2

2.4 Summary of Alternatives 2-5

2.5 Comparison of Alternatives 2-6

Tables

Table 2-1 Significant Impacts and Mitigation Measure Summary 2-3

2.0 Summary

CEQA Guidelines section 15123 requires an EIR to contain a brief summary of the proposed project and its consequences. The summary identifies each significant effect and the proposed mitigation measures and alternatives to reduce or avoid that effect; areas of controversy known to the lead agency; and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

2.1 PROPOSED PROJECT SUMMARY

Location and Setting

The project site is an undeveloped 15.64-acre parcel located within the Toro Area Plan and the Las Palmas Ranch Specific Plan, approximately 0.5 miles southeast of the intersection of River Road and State Route 68. Surrounding land uses include residential development to the east and southeast, undeveloped residentially-designated property to the west, resource conservation (open space) that was established as part of the development of Las Palmas Ranch to the south, and cultivated farmland across River Road to the north. .

General Plan and Zoning

The 2010 Monterey County General Plan and 2010 Toro Area Plan (the Toro Area Plan is included in the General Plan) land use designation for the site is Medium Density Residential, 2.61 units/acre. The zoning, consistent with the 2010 Monterey County General Plan and 2010 Toro Area Plan for the site is Medium Density Residential, 2.61 units per acre, with a Design Control Overlay (MDR/2.61D).

The current zoning and land use pattern was established in the Las Palmas Ranch Specific Plan and incorporated into the 1986 Toro Area Plan, and subsequently into the 2010 Monterey Country General Plan and 2010 Toro Area Plan.

Project Description

The proposed project includes a Specific Plan amendment, use permit, and design approval for the construction and operation of an approximately 120,000 square-foot (including non-living space, such as garages, in the "casitas" units) senior assisted living facility consisting of multiple structures and associated site improvements on an approximately 15.64-acre site. The facility would provide assisted living facilities for seniors requiring varying levels of assistance.

2.2 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

This draft EIR identifies significant or potentially significant environmental impacts in several areas as identified below. The impacts are presented in a summarized format in Table S-1, with the full text of the mitigation measure. The full text of the environmental setting, project analysis, and impacts and the mitigation measures can be found with Sections 5.0 through 16.0.

Significant Project Impacts

Project-level significant impacts are anticipated in the following areas:

- Aesthetics (impact to scenic vistas; introduction of light and glare);
- Air Quality (air pollutant emissions);
- Biological Resources (impacts to special-status animal species; impacts to nesting birds);
- Transportation & Traffic (impact to intersections); and
- Transportation & Traffic (impact to SR 68).

Significant Cumulative Effects

Significant cumulative impacts are anticipated in the following areas:

- Transportation & Traffic (impact to intersections); and
- Transportation & Traffic (impact to SR 68).

Significant Unavoidable Impacts

Significant unavoidable impacts are anticipated in the following areas:

- Transportation & Traffic (project level impact to SR 68); and
- Transportation & Traffic (cumulative level impact to SR 68).

Growth Inducting Effects

The subject parcel is the last remaining undeveloped property in the Las Palmas Specific Plan with a residential land use designation. Since the remainder of the Las Palmas Specific Plan has been built-out since the 1990s, the proposed project would not be population-inducing and would be consistent with General Plan and zoning designations for the site. Therefore, the project would not have growth inducing effects.

2.3 AREAS OF KNOWN CONTROVERSY

CEQA Guidelines section 15123(b)(2) requires an EIR summary to identify areas of controversy known to the lead agency including issues raised by agencies and the public. The lead agency is aware of potential controversy regarding an increase in traffic on the local

Table 2-1 Significant Impacts and Mitigation Measure Summary

Area of Concern	Significant Impact	Mitigation #	Mitigation Measure Summary	Residual Impact
Aesthetics	Altering existing scenic vistas and visual character of project site.	AES-1	The applicant shall prepare and submit a landscape plan to enhance screening from State Route 68, River Road, Reservation Road, and the adjacent neighborhood and trail.	Less than Significant
Aesthetics	Altering existing scenic vistas and visual character of project site.	AES-2	The applicant shall submit a final plan for colors and materials used for the buildings, which shall be earth toned to blend with the existing vicinity landscape.	Less than Significant
Aesthetics	Altering existing scenic vistas and visual character of project site.	AES-3	The applicant's final improvement plans shall include construction of all new utility and distribution lines on the project site underground.	Less than Significant
Aesthetics	Introduce new sources of light and glare.	AES-4	The applicant shall prepare and submit a lighting plan for the project site.	Less than Significant
Air Quality	Generate construction emissions.	AQ-1	The applicant shall prepare a grading plan with dust control measures for the project site.	Less than Significant
Air Quality	Generate construction emissions.	AQ-2	A construction foreman shall be designated to ensure dust control measures are implemented.	Less than Significant
Air Quality	Expose sensitive receptors to construction dust and diesel exhaust emissions.	AQ-3	All off-road construction vehicles and all construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications	Less than Significant
Air Quality	Expose sensitive receptors to new sources of toxic air contaminants.	AQ-3	"	
Biological Resources	Potential loss or disturbance of American badger.	BIO-1	Conduct pre-construction surveys.	Less than Significant
Biological Resources	Potential loss or disturbance of burrowing owl.	BIO-2	Conduct pre-construction surveys.	Less than Significant
Biological Resources	Potential loss or disturbance of Monterey dusky-footed woodrat.	BIO-3	Conduct pre-construction surveys.	Less than Significant

Summary Table page 2

Area of Concern	Significant Impact	Mitigation #	Mitigation Measure Summary	Residual Impact
Biological Resources	Potential loss or disturbance of western red bat.	BIO-4	Conduct pre-construction surveys.	Less than Significant
Biological Resources	Potential loss or disturbances of nesting birds.	BIO-5	Conduct pre-construction surveys.	Less than Significant
Transportation & Traffic	Add vehicle trips to SR 68.	TRA-1	Schedule shift changes outside morning and evening peak hours.	Significant
		TRA-2	Development shuttle service program.	Significant
Transportation & Traffic (Cumulative)	Add cumulative vehicle trips to vicinity intersections.	CTRA-1	Pay TAMC and Monterey County traffic impact fees.	Less than Significant
Transportation & Traffic (Cumulative)	Add cumulative vehicle trips to SR 68.	TRA-1, TRA-2, CTRA-1	"	Significant
Energy	Increased energy consumption.	ENG-1	Demonstrate how the project is consistent with the energy conservation policies of the Las Palmas Ranch Specific Plan.	Less than Significant

roadway system. Other potential issues were raised by two members of the public (adjoining residents) during the project's NOP process. No issues were raised by other local, state or federal agencies. The only comment letter received from a state agency was from the California Department of Transportation (Caltrans). Letters are included in Appendix A, Notice of Preparation and Responses.

2.4 SUMMARY OF ALTERNATIVES

Project alternatives are presented, discussed, analyzed, and compared in Section 17.0, Alternatives.

The following project alternatives were analyzed:

1. Alternative 1: No project/no development;
2. Alternative 2: No project/minimum use;
3. Alternative 3: No project/existing zoning; and
4. Alternative 4: Reduced project.

Alternative 1: No Project/No Development

The "no project/no development" alternative assumes no development would occur on the project site. The project site would continue to be vacant land, partially used for grazing.

Alternative 2: No Project/Minimum Use

The "no project/minimum use" alternative assumes the proposed project would not be constructed or operated on the project site. Instead, this alternative considers the construction of the minimum allowable use on the subject property, which would be one single family dwelling and any accessory structures considered incidental to residential use, such as barns and storage buildings.

Alternative 3: No Project/Existing Zoning

The "no project/existing zoning" alternative assumes the proposed project would not be constructed or operated on the project site. However, considering that the project site is designated for medium density residential development at up to 2.61 units/acre, it is feasible that up to 40 dwelling units could be approved and constructed on the project site. It is also worth noting that types of uses could be considered for this alternative. Based on existing zoning for the project site, the following uses could be established on the project site through the approval of the appropriate permits:

- Public and quasi-public uses including churches, cemeteries, parks, playgrounds, schools, public safety facility, public utility facilities;
- Mobile home park;
- Agricultural employee housing;
- Christmas tree cutting and removal and other uses of similar agricultural nature;

- Other uses of a similar nature, density and intensity;
- Transitional Housing; or
- Supportive Housing.

Alternative 4: Reduced Project

The "reduced project" alternative includes a reduced development footprint. For conceptual purposes, Alternative 4 eliminates the casitas from the proposed project. This would result in the loss of 26 living units with 42 beds, representing 30 percent of the total beds of the proposed project, and would result in a proportionate reduction in environmental impacts. Therefore, under this reduced project scenario, development on the project site would include the assisted living facility and memory care living facility, and other associated site improvements.

2.5 COMPARISON OF ALTERNATIVES

The no project/no development alternative would result in no potential adverse environmental impacts, but would not meet any of the proposed project objectives. The no project/minimum development alternative would result in less environmental impacts than the proposed project, but would not meet any of the proposed project's objectives. The no project/existing zoning alternative would result in a similar level of impacts as the proposed project; however, and would not meet the objectives of the proposed project. The reduced project would have an overall reduction in intensity of potential impacts based on the overall reduction in development on the project site, but the reduced project alternative would only partially meet the objectives of the proposed project and may prove to be economically infeasible. Therefore, the environmentally superior alternative that would partially meet the objectives of the proposed project would be the reduced project alternative.

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TABLE OF CONTENTS

3.0 ENVIRONMENTAL SETTING 3-1

3.1 Project Site and Vicinity Setting 3-1

3.2 Baseline Conditions 3-2

3.3 Regional Setting 3-2

3.4 consistency with Applicable Plans 3-12

Figures

Figure 3-1 Project Location 3-3

Figure 3-2 Aerial Photograph 3-5

Figure 3-3 Surrounding Uses 3-7

Figure 3-4 Project Site Photos 3-9

Tables

Table 3-1 Policy Consistency Review (Las Palmas Ranch Specific Plan, Monterey County 2010 General Plan, Toro Area Plan) 3-13

3.0
Environmental Setting

3.1 Project Site and Vicinity Setting

Project Location

The project site is located along River Road between the cities of Monterey and Salinas, within the unincorporated area of Monterey County. The location of the project site is illustrated in Figure 3-1, Project Location. Surrounding land uses include row crop production to the north across River Road, areas of the Ferrini Ranch development that will be maintained in open space, limited residential uses, and a future winery to the south and west, and areas of the Las Palmas Ranch #1 subdivision of single family dwellings to the east.

Project Site Setting

The project site is a 15.64-acre lot created as part of the Las Palmas Subdivision #1. The site is located within the boundary of the Las Palmas Ranch Specific Plan. The Las Palmas Ranch Specific Plan designated the property Medium Density Residential in 1983. That designation continues through the Monterey County 2010 General Plan and 2010 Toro Area Plan. The property is currently zoned "MDR/2.61-D" (Medium Density Residential, 2.61 units per acre; Design Control).

The project site is a knoll rising above River Road and the existing Las Palmas Subdivision #1 neighborhood to a largely flat plateau that would be the primary development area. Existing site improvements consist of an existing graded dirt driveway off of Woodridge Court at the southeasterly corner of the site, storm drain inlet pipe and electrical vaults at the southeasterly property corner, two cribwall-type retaining walls near the westerly end of the access drive, and a reclaimed water irrigation distribution system. The site is characterized by non-native grasses and numerous mature non-native eucalyptus trees. There is no current active use of the project site, although a small portion of the southwest corner is occasionally grazed. Site elevations range from approximately 70 feet above sea level in the northeastern area of the project site to 210 feet above sea level in the southwestern area of the project site. Slopes on the project site are 0-30% and 30-50% slope. Figure 3-2, Aerial Photograph, presents the project site characteristics. Figure 3-3, Surrounding Uses, presents the project site's surrounding uses. Figure 3-4, Project Site Photos, presents photographs of the existing setting at the project site.

3.2 BASELINE CONDITIONS

The project site is undeveloped and there is no current use of the site aside from a portion used for occasional grazing. This is the baseline condition of the project site as considered by this EIR. However, the Las Palmas Ranch Specific Plan designated the property for medium density residential. That designation continues through the Monterey County 2010 General Plan and 2010 Toro Area Plan. The Las Palmas Ranch Specific Plan EIR previously evaluated potential impacts of development of the Specific Plan area, including the project site. While not the CEQA baseline to determine the potential environmental impacts of this project, individual and cumulative impacts should also be viewed in the context of the level of development and associated impacts of the specific plan.

3.3 REGIONAL SETTING

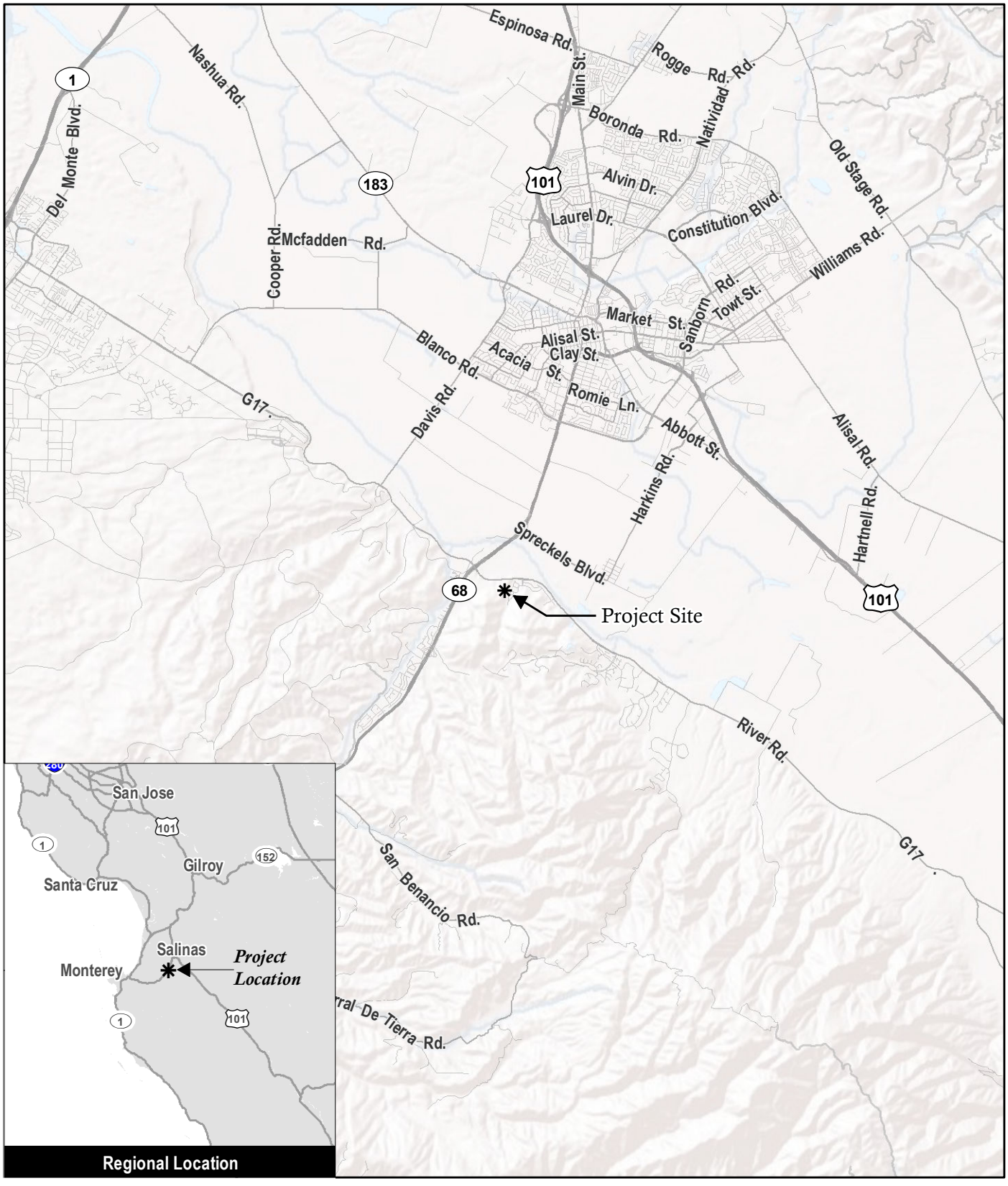
The regional setting discussion is taken from the Monterey County 2010 General Plan and 2010 Toro Area Plan.

Geography

The project site is located in the Toro Planning Area in the north central area of unincorporated Monterey County, south of the city of Salinas and east of the Monterey Peninsula. The planning area is comprised of approximately 74 square miles and is dominated by the mountains and rolling hills of the Sierra de Salinas Range. Mount Toro, with an elevation of 3,560 feet, is the highest peak in the range and is located on the southern boundary of the planning area. The terrain of the planning area varies greatly and is composed primarily of rolling hills and valleys. Elevations within the planning area range from approximately 40 feet above sea level to 3,560 feet above sea level. Topography in the planning area includes steep ravines with slopes exceeding 75 percent, a large amount of hillsides with slopes exceeding 30 percent, canyon floor and ridgelines with moderate slopes, and the flat floodplains along the Salinas River.

Soils and Slope

A wide variety of soils are present in the planning area. The characteristics of the soils and the slope of the land are significant determinants of the appropriate land uses for a specific area. Some of the soils, due to their composition, drainage, and gentle slope, are suitable for either agricultural use or urban use. Such soils are found along River Road, State Route 68, and in some of the Corral de Tierra/San Benancio area. Other soils pose severe limitations to the agricultural or urban use of the land. Rugged areas along Laureles Grade Road, in the south and central portions of the planning area, and on the east slopes of the Sierras de Salinas have soils that limit the development and use of the properties .



Source: Esri 2017

Figure 3-1

Project Location

River View at Las Palmas Senior Living Community Project Draft EIR

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Source: Monterey County GIS 2016, Google Earth 2017

Figure 3-2

Aerial Photograph

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Source: Monterey County GIS 2016, Google Earth 2017

Figure 3-3

Surrounding Uses

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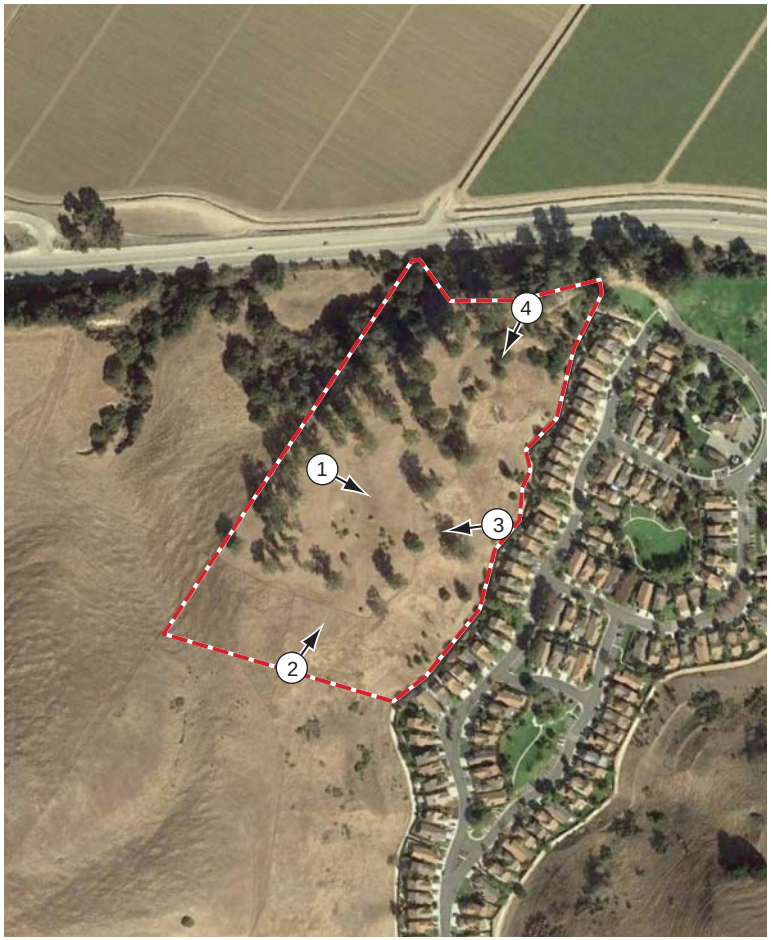
1 Southern view from the north area of the project site



3 Western view from the east area of the project site

2 Eastern view from the west area of the project site

Project Site

Source: Google Earth 2017
Photographs: EMC Planning Group 2016

4 Northern view from the south area of the project site

Figure 3-4
Site Photos

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Farmlands

The USDA Soil Conservation Service has developed and adopted a system for categorizing important farmlands for California and the rest of the nation. The system distinguishes four categories of farmlands, each with specific criteria. The categories are "prime farmlands," "farmlands of statewide importance," "unique farmlands," and "farmlands of local importance." All farmlands in the Toro planning area qualifying as prime farmlands and farmlands of statewide importance are located along River Road and the Salinas River. These lands are among Monterey County's most productive. The planning area also contains farmlands of local importance. The project site is designated “grazing land” by the Soil Conservation Service and, therefore, is not considered important farmland.

Water Resources

Water resources of the planning area are divided between two watersheds. One is within the El Toro Basin and encompasses 32 square miles of the 74 square miles of the planning area. The other is within a portion of the large Salinas River Basin. Surface water is a very limited resource in the planning area. The Salinas River is the only river or stream in the planning area that flows year-round. El Toro Creek flows only seasonally. There are no sizable reservoirs in the planning area. The flow of the Salinas River is controlled by the monitored release of water from the San Antonio and Nacimiento reservoirs, located over 70 miles to the south.

Groundwater resources within the planning area vary greatly from one area to another. There are differences in water quality, storage capacity of the aquifers, and hydraulic properties. These differences arise primarily from the variations in underlying geologic formations.

Vegetation and Wildlife

There are four general vegetation communities present in in the Toro planning area: grasslands, chaparral, woodlands, and riparian. Of the four communities, grasslands and woodlands predominate. Dry soils such as those on steep or south-facing slopes, on ridgetops, or in dry hot valleys support grassland vegetation, as do soils in areas which have been heavily grazed.

Scattered among the slopes of the planning area are chaparral plant communities of hard woody evergreen shrubs. The grasslands and chaparral both present a high fire risk, particularly on the steeper slopes and during the dry season. The woodlands of the planning area are dominated by evergreen oak communities, and are generally found on the north and east facing slopes, and in the valleys. Riparian vegetation is limited in the planning area and is found adjacent to the Salinas River and El Toro Creek.

The vegetation in the planning area is highly valued for its scenic qualities, recreational opportunities, and its role in watershed and soil management. Just as important, however, is its role of providing habitat for wildlife. A diversity of birds and animals find food, shelter, and cover in the planning area's various vegetation communities.

Vegetation on the project site consists of non-native grasslands, non-native Eucalyptus trees, non-native Monterey cypresses, and native coast live oak trees. Most of the site supports non-native grassland with various shrubs also present.

Environmentally Sensitive Areas – Toro Planning Area

The following plant species have been identified as environmentally sensitive habitats within the Toro Planning Area. The rare and endangered Hutchinson's delphinium (*Delphinium hutchinsonae*), Carmel Valley bush-mallow (*Malacothamnus palmeri, involucratus*) and Monterey manzanita (*Arctostaphylos montereyensis*) have been identified in the planning area. The rare but not endangered plant, the Monterey Ceanothus (*Ceanothus rigidus*), is also located in the planning area. The California Natural Areas Coordinating Council has designated Toro Regional Park as an area of unique research, education, and recreation value because of its oak woodlands, chaparral communities, and relatively undisturbed site.

Archaeological resources are also sensitive to man's activities but information is scarce regarding where these resources are located. Using the information available and applying the various topographic characteristics most often associated with such sites, Monterey County has delineated three archaeological sensitivity zones: low, moderate, and high, which indicate the relative probability of an archaeologically sensitive site being present. Within the planning area, there is one section of high archaeological sensitivity located southeast of State Route 68 in the Corral de Tierra area. The area located north of River Road is in the low sensitivity zone and the remainder of planning area has been designated as having a moderate chance of containing areas of archaeological importance.

3.4 Consistency with Applicable Plans

In accordance with CEQA Guidelines section 15125(d), this section identifies and discusses inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.

The proposed project was evaluated for consistency with the Monterey County General Plan, Toro Area Plan, and Las Palmas Specific Plan in the relevant sections of this draft EIR.

Table 3-1 Policy Consistency Review (Las Palmas Ranch Specific Plan, Monterey County 2010 General Plan, Toro Area Plan)

TABLE OF CONTENTS

4.0 PROJECT DESCRIPTION 4-1

4.1 Project Objectives 4-1

4.2 Project Characteristics 4-1

4.3 Intended Uses of the EIR 4-21

Figures

Figure 4-1 Site Plan 4-3

Figure 4-2 A Unit Casitas 4-7

Figure 4-3 B Unit Casitas 4-9

Figure 4-4 C Unit Casitas 4-11

Figure 4-5 Assisted Care Facility 4-13

Figure 4-6 Memory Care Facility 4-15

Tables

No table of figures entries found.

4.0
Project Description

4.1 PROJECT OBJECTIVES

The objectives of the proposed project, provided by the applicant, are:

- To develop a state of the art facility to provide a Continuum of Care Residential Community designed to provide care to seniors over the age of 55 and to persons with diminishing mental capacity due to Alzheimer's, dementia, or similar causes.
- To provide a range of care options for persons who do not require 24-hour skilled nursing care but are in need of a range of personal assistance with the activities of daily living such as dressing, bathing, grooming, and medication management.
- To provide a range of accommodations which will allow persons who only need some help to maintain a modicum of an independent lifestyle to move into smaller home-like suites and then transition to other on site facilities which can provide a greater level of daily personal assistance as needed.
- To provide such a facility in a geographic location where the need for such a facility is clearly needed and where adequate public facilities currently exist or can be readily provided.
- To provide such a facility in and near an established community so that residents in the facility can feel a sense of connection with local residents and where in turn local residents as they age or their circumstances change can relocate to an assisted living facility without the need to move from their community or far away from their families.
- To provide a range of job and volunteer opportunities for persons in the area and in the Las Palmas community.
- Be licensed by the State of California as a Residential Care Facility for the Elderly (RCFE).

4.2 PROJECT CHARACTERISTICS

River View at Las Palmas Senior Living Community (the proposed project) is designed to provide a range of assisted care to seniors over the age of 55 and to persons with diminishing mental capacity due to Alzheimer's, dementia, or similar causes. The entire facility would be licensed by the State of California as a Residential Care Facility for the Elderly.

The community is designed for residents who do not require 24-hour skilled nursing care, but are frail and require personal assistance with activities of daily living such as dressing, bathing, grooming, and medication management. This setting allows residents who are experiencing difficulty with maintaining totally independent lifestyles to move into smaller, home-like suites where they can receive daily personal assistance as needed.

General assisted living communities provide the following services:

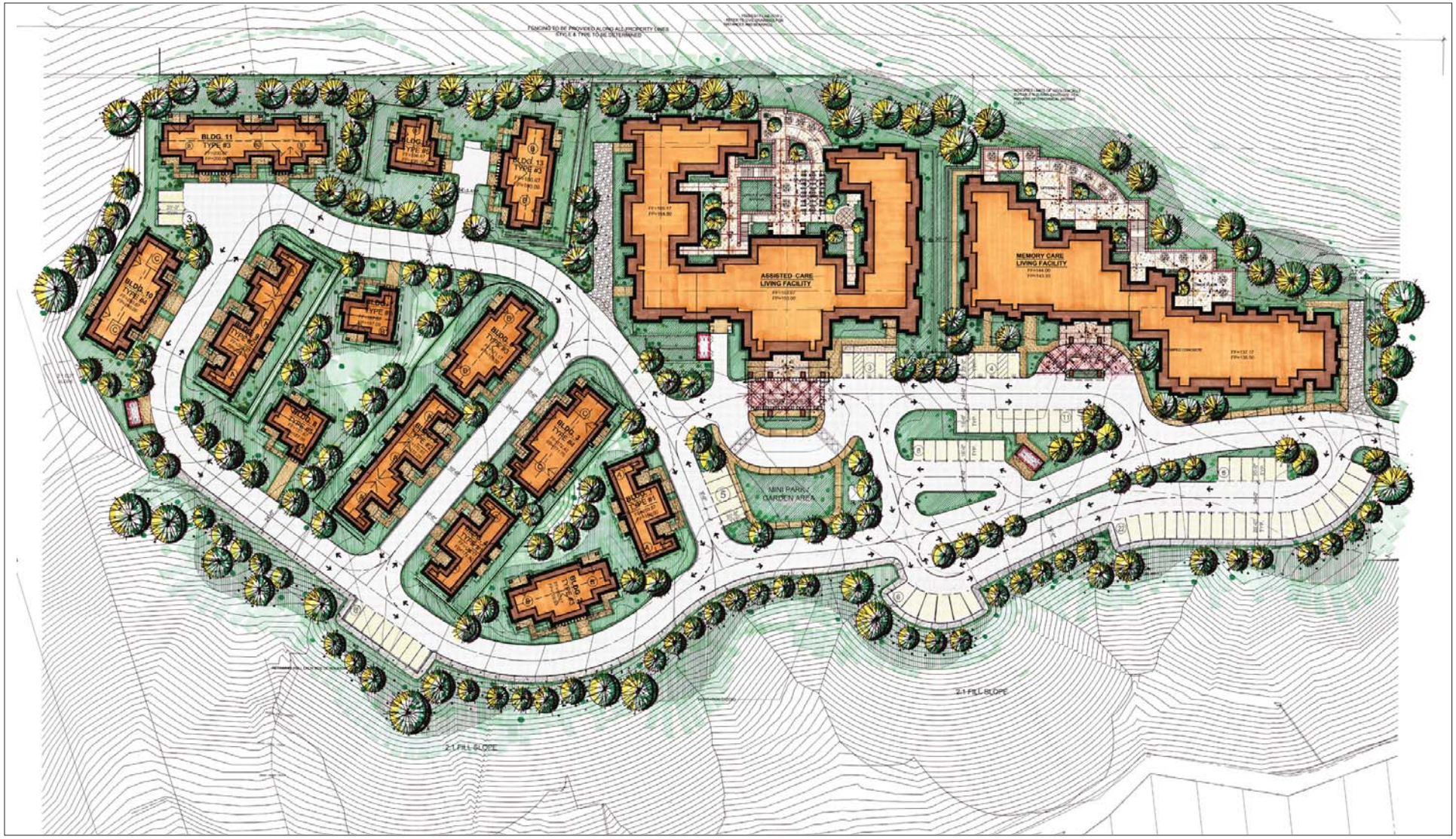
- monitoring of medication;
- approximately twice a week bathing assistance;
- assistance with dressing and grooming;
- 24-hour per day supervision and security;
- one to three meals per day in one of two communal dining rooms or in their units, depending on their condition and mobility;
- full linen and personal laundry service, if desired;
- weekly housekeeping/maid service;
- daily bed making, if needed;
- activity program five days a week;
- scheduled transportation to doctor appointments;
- ambulating;
- phone use;
- transferring; and
- assistance with toileting.

Project Facilities

The senior community would be comprised of three levels of residence, each with their own level of assistance: Casitas, Assisted Living Facility, and Memory Care Facility. Figure 4-1, Site Plan, displays the layout of the proposed project.

Casitas

Casitas are designed specifically for seniors who may require varying levels of assistance in their basic living needs. One meal a day, shuttle service, maintenance and cleaning will be included in the residential agreement for each Casitas resident. Although Casitas residents may maintain some independence in their life style, including the option of fixing their own meals and keeping their vehicles, a full range of assisted living services will be available to them.



Source: R.L. Davidson 2015

Figure 4-1
Site Plan

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There are 13 Casitas structures providing 26 separate units (referred to as A, B or C units) with a total of 42 beds. The Casitas structures are all single stories, approximately 18 feet in height, and range in size from 1,513 to 3,757 square feet. The unit breakdown is:

- "A" units: There will be a total of 10 "A" units. "A" units are 893 square feet, and include 1 bedroom, 1 bath, kitchen, patio and 1 car garage. Figure 4-2, A Unit Casitas, presents the proposed exterior appearance and a layout of these units.
- "B" units: There will be a total of 12 "B" units. "B" units are 1,138 square feet, 2 bedroom, 2 bath, kitchen, patio and 1 car garage. Figure 4-3, B Unit Casitas, presents the proposed exterior appearance and a layout of these units.
- "C" units: There will be a total of 4 "C" units. "C" units are 1,307 square feet, 2 bedroom, 2 bath, kitchen, study, patio and 2 car garage. Figure 4-4, C Unit Casitas, presents the proposed exterior appearance and a layout of these units.

The Casitas provide 30 garage stalls and 16 open parking stalls. Total coverage for the 13 structures is approximately 37,700 square feet.

Assisted Living Facility

The assisted living facility is designed specifically for seniors who may need a full range of assistance to meet their living needs. A full range of services including meals, medical assistance, transportation, cleaning and laundry service is available for each resident.

The assisted living facility is a two-level structure approximately 28 feet in height and will cover about 27,000 square feet. The assisted living facility includes 40 living units ranging from 360 to 587 square feet and a total of 52 beds. The exterior elevations of the assisted living facility are displayed in Figure 4-5, Assisted Care Facility. The unit breakdown is:

- "A" units (19 units): "A" units are 413 square feet and include 1 bedroom and 1 bath. No kitchen or cooking facilities are included in the A units.
- Studio units (9 units): Studio units range from 360-394 square feet and include a combined living room/bedroom and a bathroom. No kitchen or cooking facilities are included in the Studio units.
- Companion units (12 units): Companion units range from 527-587 square feet. Each unit contains 2 living room/bedroom areas, some with their own bathroom, others have shared bathrooms. No kitchen or cooking facilities are included in the Companion units.

The assisted living facility includes a reception area, lobby, activity/exercise/arts and craft/hobby rooms, theatre, residents' business center, self-operated laundry and other common areas, outdoor plazas staff offices and nurses' offices. The lobby is flanked by two fireplaces and stairways, with multiple conversation areas in the lobby as well as throughout the two floors. A small "bistro" and a library are located on the upper level, with both a

grand dining hall and a private dining room. The building is serviced by a larger elevator for residents and a smaller one for food supply transfer. Residents can take all their meals in the dining room but can arrange for meals to be delivered to their rooms. Staff have lounge and break facilities as well. A 28-space parking lot is provided for staff and visitors.

Memory Care Facility

The memory care facility is designed specifically for persons who, due to diminished mental capacity, need full range of assistance to meet their living needs. All meals, medical assistance, transportation, cleaning and laundry service are available for each resident. The memory care facility is a three-level structure approximately 30 feet in height and will cover about 21,600 square feet. The memory care facility includes 39 living units ranging from 313 to 453 square feet and a total of 48 beds. The exterior elevations of the memory care facility are displayed in Figure 4-6, Memory Care Facility. The unit breakdown is:

- Studio units (30 units): Studio units range from 313-368 square feet and include a combined living room/bedroom and a bathroom. No kitchen or cooking facilities are included in the Studio units.
- Companion units (9 units): Companion units are up to 453 square feet in area. Each unit contains 2 living room/bedroom areas and 1 bathroom. No kitchen or cooking facilities are included in the Companion units.

The memory care facility includes a reception area, lobby, cafe, resident lounges and sitting rooms, and other common areas, outdoor plazas, kitchen and resident dining and private dining rooms, staff offices and lounges and a nurses' office. The building is serviced by two residents' elevators. A 32-space parking lot is provided for staff and visitors.

Total Site Coverage

Total site coverage is approximately 190,000 square feet (27.6 percent of the project site) and is comprised of:

- Casitas - 41,341 square feet (6 percent);
- Assisted Living – 27,052 square feet (4 percent);
- Memory Care – 21,613 square feet (3 percent); and
- Roads, driveways, parking – 99,523 square feet (14.6 percent).

The total floor area, including casitas units, is approximately 110,085 square feet.

Site Access

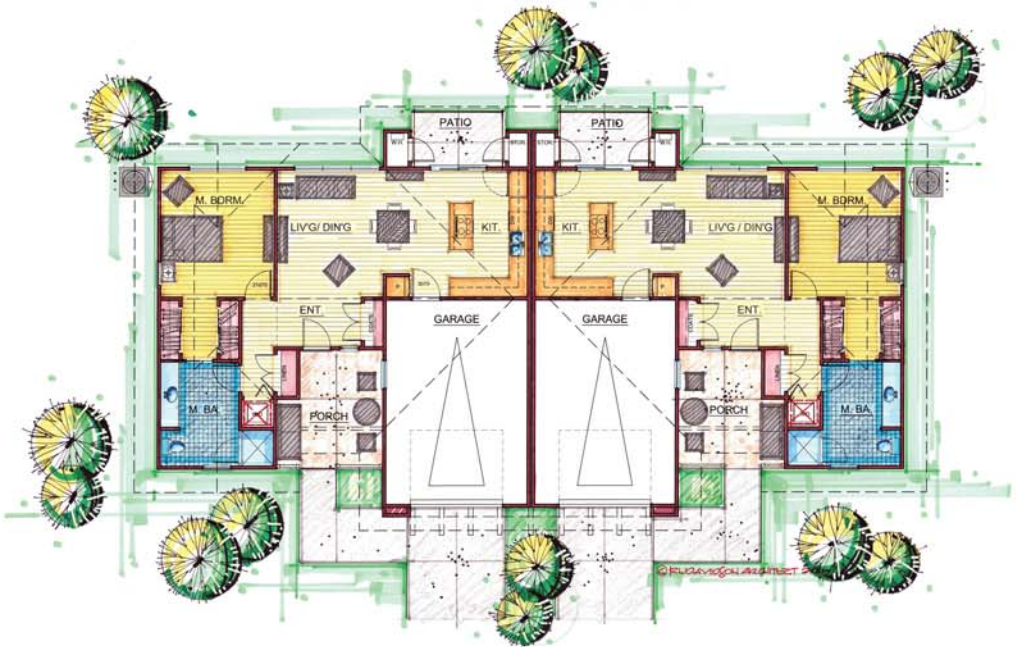
River Road provides the northern boundary of the property. There is no direct access from River Road and none is proposed. Access to the site is from the signalized intersection at

River Road and Las Palmas Road to River Run, then Woodridge Court. River Road is a public road maintained by the County of Monterey. Las Palmas Road, River Run and Woodridge Court are private roads maintained by the Las Palmas Ranch Home Owners

Figure 4-2 A Unit Casitas

ASSISTED CARE FACILITY - CASITAS
FRONT ELEVATION - BUILDING TYPE 1 - A / A UNITS

NOTE: MATERIALS ARE TYPICAL AT ALL ELEVATIONS AS SHOWN



Source: R.L. Davidson 2015

Figure 4-2
A Unit Casitas

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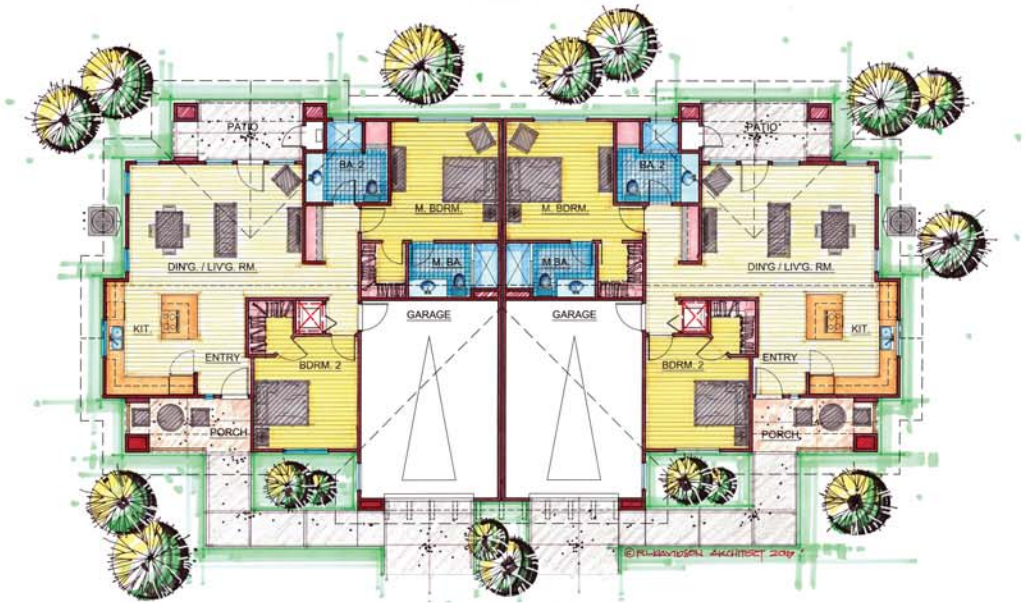
ASSISTED CARE FACILITY - CASITAS

FRONT ELEVATION - BUILDING TYPE 3 - B / B UNITS

NOTE: MATERIALS ARE TYPICAL AT ALL ELEVATIONS AS SHOWN



Source: R. L. Davidson 2015

Figure 4-3

B Unit Casitas

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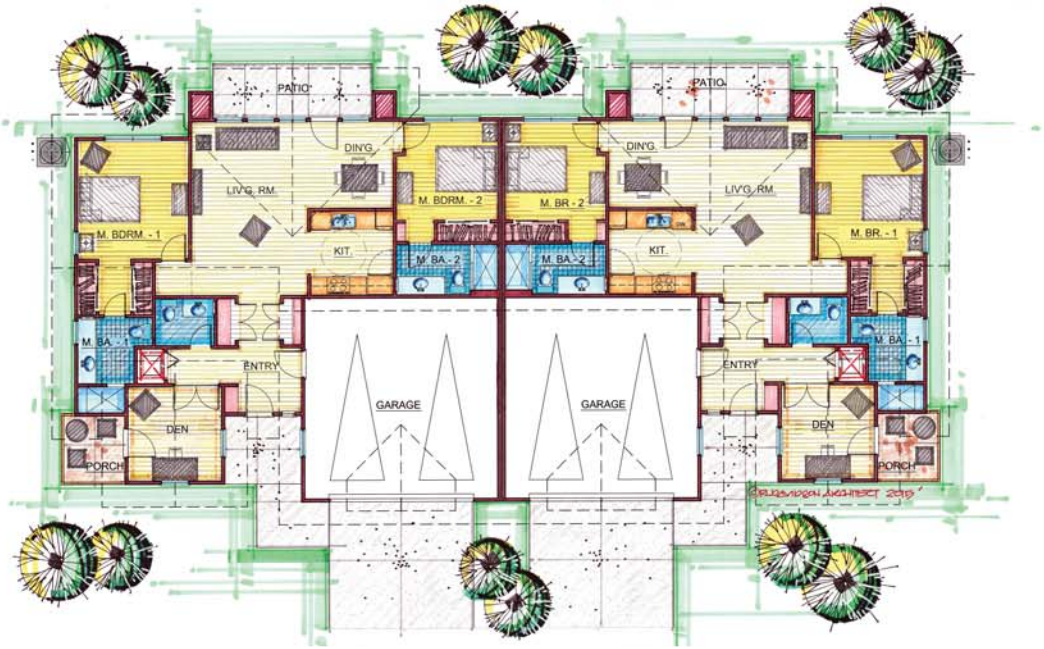
ASSISTED CARE FACILITY - CASITAS
FRONT ELEVATION - BUILDING TYPE 4 - C / C UNITS
NOTE: MATERIALS ARE TYPICAL AT ALL ELEVATIONS AS SHOWN



Source: R. L. Davidson 2015

Figure 4-4
C Unit Casitas

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Source: R. L. Davidson 2015

Figure 4-5
Assisted Care Facility

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Source: R. L. Davidson 2015

Figure 4-6
Memory Care Facility

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Association. Woodridge Court terminates at the entrance to the project site. Access to the proposed development will be by a private loop drive. The project applicants, who own the site, are currently members of the Las Palmas Ranch Home Owners Association and have paid dues to the association. The applicants will pay a proportionate share for the use of the roads and drainage system.

Shuttle services will be provided to residents to access areas on the Monterey Peninsula and Salinas, including regular shuttle service for employees to transportation hubs nearby.

Tree Removal and Conceptual Landscaping

Most of the non-native eucalyptus trees on site, approximately 80 trees, will be removed and will be replaced with a significant amount of landscaping designed to both enhance residents living environment and to screen views of the project from neighboring properties and distant views from State Route 68. A grove of eucalyptus at the north side of the Memory Care facility will remain to provide significant screening of that portion of the project from State Route 68 until the project landscaping matures and provides adequate screening.

Grading

Development of the project will require approximately 60,000 cubic yards of cut, most of which will be compacted and used on site, and 34,500 cubic yards of fill.

Background

The project site is a lot created when the Las Palmas Ranch Subdivision #1 was recorded. The site was identified in the Las Palmas Ranch Specific Plan adopted by the Board of Supervisors September 20, 1983. The project site was identified as an area for medium density residential use. The Monterey County Board of Supervisors then adopted the Toro Area Plan on December 13, 1983 and incorporated the Las Palmas Ranch Specific Plan by reference.

As Las Palmas Ranch developed in the late 1980s and early 1990s, the developers chose, in light of the market demand for larger homes with view potential, to relocate the units that were anticipated to be built on the project site to areas of Las Palmas Ranch that are accessed from Las Palmas Parkway. Although the "relocation" was approved by the County, it was not based on an amendment to the specific plan to reduce the overall development potential of the Las Palmas Ranch Specific Plan or of the project site. Even after the residential limit of the specific plan was nearly met (the specific plan residential building cap is 1,031; presently, 1,028 units have been built), there was no requirement or amendment to reduce the development potential of the project site. The 2010 Monterey County General Plan and 2010 Toro Area Plan maintained the Medium Density Residential land use and zoning designations established with through the adoption of the Las Palmas Ranch Specific Plan.

Applications

Specific Plan Amendment

The proposed project includes an amendment to the Las Palmas Ranch Specific Plan. The Specific Plan designates the project site Medium Density Residential (MDR), a designation that is generally used to develop single-family detached residences at a density between one and five units per acre. However, in addition to residential uses, the MDR designation also allows public/quasi-public uses (Zoning Ordinance 21.12.050(D)), including assisted living facilities, through the approval of a conditional use permit. Residential care facilities are similarly allowed with a conditional use permit (Zoning Ordinance 21.12.050(C)) in the MDR Zoning District. The proposed project falls under the County's general definition of a residential care facility in that the project will be licensed by the State of California to provide "…24-hour residential care and varying levels and intensities of medical or non-medical care, supervision, services or assistance to persons living in a residential setting." The proposed project is not a residential use under the County codes or the Specific Plan and the project does not provide dwelling units that will operate or function as independent units.

For clarity in regard to the future use and development of the project site for the proposed project, the following amendment to the specific plan is proposed:

> "Assisted living facilities are allowable uses in the MDR district in that they are similar to other uses such as rest homes and public quasi-public uses currently allowed in the district through the approval of a conditional use permit. Assisted living facilities are not considered residential units and are not subject to the current 1,031 residential limitation of the Specific Plan. An assisted living facility is considered a public/quasi-public use, not a residential use, because it does not operate or function in a manner like independent residential units. An assisted living facility may, therefore, be considered and approved through a conditional use permit on Parcel Q of the Las Palmas Ranch Specific Plan. "

Use Permit and Design Review

The proposed project will require approval of a Conditional Use Permit from the County of Monterey.

Ministerial Permit Requirements

The proposed facility would be regulated by the Monterey County Environmental Health Bureau for the following: onsite food preparation services, storage and disposal of 1) medical waste, 2) hazardous materials, and 3) solid waste. Prior to issuance of ministerial permits, the Environmental Health Bureau would ensure all required permits are obtained to ensure public health and safety standards are met once the facility is in operation.

Proposed Land Uses

The project site was identified by the specific plan as an area for medium density residential use and the property is, accordingly, zoned "MDR/2.61-D" (Medium Density Residential, 2.61 units per acre; Design Control) by the County of Monterey.

In October 2010, the Board of Supervisors adopted the Monterey County General Plan 2010, including the updated 2010 Toro Area Plan. Monterey County General Plan 2010 Figure LU10, Toro Area Plan Land Use Plan, displays the project site as Medium Density Residential, 2.61 units/acre. The Monterey County General Plan 2010 describes the Medium Density Residential designation as being "…appropriate for a range of residential uses (1-5 units/acre) and housing types, recreational, public and quasi-public, and other uses that are incidental and subordinate to the residential use and character of the area…building coverage is limited to 35% of the subject project" (Policy LU-2.33a).

The Monterey County MDR zoning district is intended to "…provide a district to accommodate Medium Density Residential uses in those areas of the County of Monterey where adequate public services and facilities exist or may be developed to support medium density development. It is intended to require adequate on-site facilities and amenities to assure proper, usable and livable development while allowing sufficient design flexibility to provide such development (Monterey County Code 21.12.010)."

The MDR district (Monterey County Code 21.12.050) allows for a broad range of land uses to be approved without a use permit or similar discretionary approval including supportive and transitional housing and other uses of a similar nature and intensity. Supportive and Transitional Housing are defined in Title 21, Monterey County Code as:

> **21.06.1276 - Supportive housing**. "Supportive housing" means housing with no limit on length of stay, that is occupied by the "target population" (as "target population" is defined in this chapter), and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.
>
> **21.06.1278 - Target population**. "Target population" means persons with low income having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act (California Welfare and Institutions Code, section 4500 et seq.) and may include, among other populations, adults, emancipated youth, families, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people.

> **21.06.1315 - Transitional housing and transitional housing development.** "Transitional housing" and "transitional housing development" mean buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six (6) months (California Health and Safety Code section 50675.2.).

This zoning district also allows a broad range of public/quasi-public uses subject to a use permit (Monterey County Code 21.12.050) including:

- Rooming houses and boardinghouses;
- Rest homes;
- Public and quasi-public uses including churches, cemeteries, parks, playgrounds, schools, public safety facilities, public utility facilities, but not including uses of a non-residential nature such as jails, rehabilitation centers, detention facilities, or corporation yards; and
- Other uses of a similar nature, density and intensity as those listed in this section.

Off-site Improvements

The proposed project does not include or require construction of off-site improvements. However, the applicants will be required to pay a proportionate share for the maintenance of Las Palmas Ranch private roads and drainage facilities used to serve the project site.

Population and Employment

Population

The maximum bed count for the proposed project including all components (Casitas, Assisted Care Facility, Memory Care Facility) is 142 beds and therefore, it can be assumed that the proposed project would accommodate a population of 142 persons.

Employment

The proposed project is projected to employ about 92 when operating at maximum capacity. This will include managers and supervisors, trained care givers, chefs and facility maintenance personnel. Staff per shift will be approximately:

- Morning Shift A (6:00 am to 2:00 pm): 15 employees;
- Morning Shift B (7:00 am to 3:00 pm): 20 employees;
- Day Shift A (8:00 am to 4:00 pm): 12 employees;
- Day Shift B (10:30 am to 6:30 pm): 21 employees;
- Evening Shift A (3:30 pm to 11:30 pm): 12 employees;

- Evening Shift B (11:30 pm am to 6:30 am pm): 12 employees; and
- Shifts will be staggered to minimize peak hour trips on State Route 68.

4.3 INTENDED USES OF THE EIR

In accordance with CEQA Guidelines section 15124(d), following is a list of agencies that are expected to use this EIR in their decision-making, and a list of the approvals for which this EIR may be used. These lists include information that is known to the county as the lead agency.

Local Agencies

- Monterey County - Certification of the EIR and approval of the proposed project (specific plan amendment, use permit, and design review).

State Agencies

- California Department of Social Services, Community Care Licensing Division – Licensing for proposed project as a Residential Care Facility for the Elderly.

Federal Agencies

- None applicable

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TABLE OF CONTENTS

5.0 AESTHETICS 5-1

5.1 Environmental Setting 5-1

5.2 Regulatory Setting 5-2

5.3 Thresholds or Standards of Significance 5-23

5.4 Environmental Impact Analysis 5-23

5.5 Impact Summary and Mitigation Measures 5-30

Figures

Figure 5-1 Viewpoints of Site 5-3

Figure 5-2 Public Viewpoint 1 5-5

Figure 5-3 Public Viewpoint 2 5-7

Figure 5-4 Public Viewpoint 3 5-9

Figure 5-5 Public Viewpoint 4 5-11

Figure 5-6 Public Viewpoint 5 5-13

Figure 5-7 Public Viewpoint 6 5-15

Figure 5-8 Public Viewpoint 7 5-17

Figure 5-9 Visual Simulation from State Route 68 5-25

Figure 5-10 Visual Simulation from Reservation Road 5-27

Tables

No table of figures entries found.

5.0
Aesthetics

This section of the draft EIR addresses the project's effects on visual resources, the change in the visual character of the project site and its surroundings due to the project, and the impacts of new sources of light and glare that could be added by the project. Unless otherwise noted the discussion in this section is based upon independent site investigation, information found in the *County of Monterey General Plan*, *Toro Area Plan*, and the *Las Palmas Ranch Specific Plan*.

During the Draft EIR's NOP review period, members of the public questioned potential aesthetic impacts of the proposed project. The county's NOP and comment letters are included in Appendix B.

5.1 Environmental Setting

Scenic Vistas

A scenic vista is generally described as a clear, expansive view of significant regional features possessing visual and aesthetic qualities of value to the community. The project site lies on a knoll at the northwestern end of the approximately 70-mile long Salinas Valley. The visual setting within the Salinas Valley is dominated by open space views comprised of agricultural land and the Gabilan and Santa Lucia mountains that border the valley. These features represent the primary scenic resources within Monterey County. Public views of the dominant rural agricultural landscape and mountains bordering the Salinas Valley are most common from roadways that traverse the valley. In the vicinity of the project site, State Route 68, River Road, and Reservation Road afford travelers sweeping views of agricultural and mountain landscapes.

Visual Quality and Character

The project site is a knoll rising above River Road and existing Las Palmas Subdivision #1 neighborhood to a largely flat plateau that would be the primary development area. The site is dominated by non-native grasses and non-native eucalyptus trees. There is no current active use of the project site, although a small portion of the southwest corner is occasionally grazed. There are no existing buildings or structures on the site. Site elevation ranges from approximately 70 feet above sea level in the northeastern area of the project site to 210 feet

above sea level in the southwestern area of the project site. Representative photographs showing the visual character of the site are presented in Figure 3-4, Project Site Photos, in the Environmental Setting.

Public Views

Existing public views of the site that would be altered by the proposed project are available from State Route 68 and Reservation Road to the north, River Road to the west, and roadways and park and trail areas within the Las Palmas Subdivision #1 residential subdivision to the south.

Public views from State Route 68, Reservation Road, and River Road of the project site are partially obstructed by existing topography and vegetation along roadways. Private views of the site from within the Las Palmas Subdivision #1 residential subdivision are obstructed by existing single family residences and existing topography. Figure 5-1, Viewpoints of Site, displays approximate locations of public and private views of the site. Figures 5-2 through 5-8, display photographs from these locations. Viewpoints 5, 6, and 7 are private viewpoints within the private subdivision.

Light and Glare

The existing source of light and glare in the project vicinity is primarily generated by residential development in the Las Palmas Ranch #1 neighborhood and vehicular traffic on River Road.

5.2 Regulatory Setting

State

The California Department of Transportation (Caltrans) through its California Scenic Highway Mapping System considers certain scenic corridors along travel routes as visual resources of statewide importance. State Route 68 is a designated scenic highway from State Route 1 in Monterey to the Salinas River.

County

Monterey County General Plan

Goal OS-1 of the Monterey County General Plan strives to retain the character and natural beauty of Monterey County by preserving, conserving, and maintaining unique physical features, natural resources, and agricultural operations. The following policies in the General Plan are applicable to aesthetics and visual quality at the project site.

Source: Monterey County GIS 2016, Google Earth 2017

Figure 5-1

Viewpoints of Site

River View at Las Palmas Senior Living Community Project Draft EIR

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Source: EMC Planning Group 2017

Figure 5-2
Public Viewpoint 1

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Source: EMC Planning Group 2017

Figure 5-3
Public Viewpoint 2

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Source: EMC Planning Group 2017

Figure 5-4
Public Viewpoint 3

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Source: EMC Planning Group 2017

Figure 5-5
Public Viewpoint 4

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Source: EMC Planning Group 2017

Figure 5-6
Private Viewpoint 5

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Source: EMC Planning Group 2017

Figure 5-7
Private Viewpoint 6

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Source: EMC Planning Group 2017

Figure 5-8
Private Viewpoint 7

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Policies

OS-1.1 Voluntary restrictions to the development potential of property located in designated visually sensitive areas shall be encouraged.

OS-1.2 Development in designated visually sensitive areas shall be subordinate to the natural features of the area.

OS-1.3 To preserve the County's scenic qualities, ridgeline development shall not be allowed. An exception to this policy may be made only after publicly noticed hearing and provided the following findings can be made:

a. The ridgeline development will not create a substantially adverse visual impact when viewed from a common public viewing area; and either,

b. The proposed development better achieves the goals, policies and objectives of the Monterey County General Plan and applicable area plan than other development alternatives; or,

c. There is no feasible alternative to the ridgeline development.

Pursuant to Policy OS-1.6, in areas subject to specific plans, the ridgeline policies and regulations of the applicable specific plan shall govern.

OS-1.6 In areas subject to specific plans, the ridgeline policies and regulations of the applicable specific plan shall govern. Each specific plan shall address viewshed issues, including ridgeline development, as part of the plan, including, but not limited to, provisions for setbacks, landscaping, height limits, or open space buffers.

OS-1.9 Development that protects and enhances the County's scenic qualities shall be encouraged.

OS-1.12 The significant disruption of views from designated scenic routes shall be mitigated through use of appropriate materials, scale, lighting and siting of development.

Toro Area Plan

The Toro Area Plan identifies the project site as located within an area designated as visually sensitive. The Toro Area Plan identifies State Route 68 as an existing scenic highway, and River Road and Reservation Road as proposed scenic routes (Figure #16). The following policies in the Toro Area Plan are applicable to aesthetics and visual quality at the project site.

Policies

T-3.1 Within areas designated as "visually sensitive" on the Toro Scenic Highway Corridors and Visual Sensitivity Map (Figure 16), landscaping or new development may be permitted if the development is located and designed (building design, exterior lighting, and siting) in such a manner that will enhance the scenic value of the area. Architectural design consistent with the rural nature of the Plan area shall be encouraged.

T-3.2 Land use, architectural, and landscaping controls shall be applied, and sensitive site design encouraged, to preserve Toro's visually sensitive areas and scenic entrances:

a. River Road/Highway 68 intersection; and

b. Laureles Grade scenic vista overlooking the Planning Area (Figure 16).

T-3.5 Exterior/outdoor lighting shall be located, designed, and enforced to minimize light sources and preserve the quality of darkness. Street lighting shall be as unobtrusive as practicable and shall be consistent in intensity throughout the Toro area.

T-3.7 Removal of healthy, native oak trees in the Toro Planning Area shall be discouraged. An ordinance shall be developed to identify required procedures for removal of these trees. Said ordinance shall take into account fuel modification needed for fire prevention in the vicinity of structures and shall include:

a. Permit requirements.

b. Replacement criteria

c. Exceptions for emergencies and governmental agencies

Las Palmas Ranch Specific Plan

The following policies in the Las Palmas Ranch Specific Plan are applicable to aesthetics and visual quality at the project site.

Policies

Conservation and Open Space

1. The following constitute the open space elements of Las Palmas Ranch to be protected:

A. The Salinas River bank and the riparian vegetation adjacent thereto;

B. The agricultural land north of River Road;

C. The central ridge lines and north-facing frontal slopes visible from the Highway 68 Scenic Corridor.

D. The Corey House.

2. Prohibit building on ridgelines visible from designated scenic corridors, as delineated.

3. Higher density housing units shall be clustered behind natural landforms or on lower elevations.

4. Open space areas shall be placed in scenic easements and open space zoning or otherwise adequately protected from development that could destroy the natural amenities of the site.

5. Roads which are perpendicular to viewing areas or which involve excessive cut and fill shall be discouraged.

6. Horizontal and vertical street alignments should relate to the natural contours of the site insofar as is practical.

7. Utilize mounding, informal massing, or irregularly spaced trees, planting and other overall landscaping treatment to screen development.

8. Visually obtrusive building materials and finishes shall be avoided.

Design and Sensitivity

1. All areas of the project proposed for structural development shall be placed in a sign and design control district to ensure county enforcement of the design policies of this specific plan.

3. All structure, including residential, including residential, commercial, recreational and accessory buildings; fences; walls; decks and signs shall require design approval. Approval shall be based upon conformity with the policies of this plan as well as the following specific criteria:

A. Compatibility of external design, materials and colors with existing ground elevations and natural land forms.

B. Conformity of design and location of structures with respect to existing ground elevations and natural land forms.

C. Mitigation of visual impacts from within the development and from major designated view corridors outside of the project.

D. Protection of significant trees and vegetation. Trees over 36" in circumference (four feet above the ground) shall be retained. Where it is necessary to remove such trees for better design or layout, then

they shall be replaced on a two for one basis subject to the approval of the Director of Planning.

E. Prevention of erosion, sedimentation and visual impacts resulting from grading, excavation, cutting or filling.

4. To the extent feasible, all structures should utilize natural materials such as wood and native stone and low intensity earth-tone exterior colors. Visually obtrusive building materials shall be avoided.

5. Low level exterior lighting, including street lighting shall be utilized with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. Street lights may not be used unless approved as conditions of permits obtained pursuant to this plan.

7. Mounding, informal massing, or irregularly spaced trees, planting and other overall landscaping treatment should be utilized to screen development.

8. Preserve vegetation significant to the maintenance of visual quality and to the provision of erosion control on sensitive slopes.

Title 21

Title 21 of the Monterey County Code implements the 2010 General Plan, 2010 Toro Area Plan and Las Palmas Ranch Specific Plan. The following sections explain the purpose of the Design Control district and provide the definitions in the County Code for Substantial Adverse Visual Impact and Common Public Viewing Area:

Design Control District -- 21.44.010 - Purpose.

The purpose of this Chapter is to provide a district for the regulation of the location, size, configuration, materials, and colors of structures and fences, except agricultural fences, in those areas of the County of Monterey where the design review of structures is appropriate to assure protection of the public viewshed, neighborhood character, and to assure the visual integrity of certain developments without imposing undue restrictions on private property.

21.06.1275 - Substantial adverse visual impact.

"Substantial adverse visual impact" means a visual impact which, considering the condition of the existing viewshed, the proximity and duration of view when observed with normal unaided vision, causes an existing visual experience to be materially degraded.

21.06.195 - Common public viewing area.

"Common public viewing area" means a public area such as a public street, road, designated vista point, or public park from which the general public ordinarily views the surrounding viewshed.

5.3 THRESHOLDS OR STANDARDS OF SIGNIFICANCE

The CEQA Guidelines (Appendix G) indicates that a project may have a significant effect on if it would:

- have a substantial adverse effect on a scenic vista;
- substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- substantially degrade the existing visual character or quality of the site and its surroundings; or
- create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Additionally, the Monterey County Code (21.06.1275) definition of substantial adverse visual impact is considered:

- "Substantial adverse visual impact" means a visual impact which, considering the condition of the existing viewshed, the proximity and duration of view when observed with normal unaided vision, causes an existing visual experience to be materially degraded."

These are the issues evaluated in the impact analysis below.

5.4 ENVIRONMENTAL IMPACT ANALYSIS

Scenic Vistas, Scenic Highways, and Visual Character

The project site has limited visibility from southbound River Road due to road alignment, topography, and native vegetation. Development on the project site would not occur within the 100-foot required setback from River Road. The project site is visible from northbound River Road at and near the intersection with Las Palmas Road. The project site is visible from southbound Reservation Road. Portions of the upper portion and roofs of some of the buildings will be visible from State Route 68 from the Salinas River crossing to the River Road exit. The project site is located approximately ½ to ¾ mile from State Route 68 and is visible for a distance of about 3,000 feet, more than ½ a mile. Therefore, at the normal driving speeds on that portion of State Route 68 the project site is visible for about 30-40 seconds.

The visual impacts of this project are not unexpected or significant. The LPRSP FEIR (pp 56-59) recognized that the development of Las Palmas Ranch, including this site, would "… be

expected to change from the existing open land/agriculture to a more urban setting softened by landscaping, entry way treatment and architectural control." The LPRSP FEIR also states, "Given the distance from the highway (1/2 to 3/4 mile) and the level of development envisioned by the Toro Vista development [now Ferrini Ranch] visual impacts on Highway 68 are insignificant." The FIER goes on to prescribe mitigations measures for the Las Palmas Ranch development. The River View at Las Palmas project incorporated those measures into its design.

The proposed project includes construction of 13 single-story Casitas structures, totaling approximately 28,000 square feet of living area, an approximately 43,500,000 square-foot, two-story assisted living facility, and an approximately 39,000square-foot, three-story Memory Care Facility. Construction of these facilities and associated infrastructure will require the removal of approximately 80 eucalyptus trees. A conceptual landscape plan has been included in the project application materials. The County of Monterey typically does not require a landscape plan as part of discretionary application materials, such as a conditional use permit, but has required one for the proposed River View at Las Palmas project given visibility concerns expressed by the community at public meetings, including two Toro Land Use Advisory Committee meetings and one additional community meeting, held on the project.

The proposed project will be visible from River Road, State Route 68, and Reservation Road, although it will not result in ridgeline development. The proposed project has been designed to minimize its visual impacts through the location of the various structures, use of colors and materials, and new landscaping which will be required as a condition of approval. Included in the project plans are a visual simulation from State Route 68, building elevations and renderings, and color boards. The colors have been selected to minimize visibility and blend with the hills that form the back drop for the project site. The landscaping plan incorporates a range of materials to provide visual screening for views of the project site. Initial planting will include range of size of the materials to include larger specimens (36" or 48" tree specimens) for more immediate screening and smaller plantings which will, at maturity, provide much more screening. Landscaped areas will be irrigated with reclaimed waste water.

An existing, mature eucalyptus grove will be retained on the north side of the memory care facility in order to provide additional screening of the project from State Route 68 while the project landscaping matures. Removal of the other 80 mature eucalyptus trees on the site will result in reduction of non-native species from the property, reduce potential fire hazards associated with the species, and eliminate the potential hazard of falling limbs and debris that occurs with this eucalyptus species. Initial landscape plantings include a mix of more mature plants to provide some immediate mitigation blended with younger, faster growing

plants which will provide long term mitigation. Figure 5-9, Visual Simulation from State Route 68, presents how the proposed project would be viewed from State Route 68. Figure 5-10, Visual Simulation from Reservation Road, presents how the proposed project would be viewed from Reservation Road. These locations were chosen because they were determined to provide the maximum visibility of the project site from these roadways.

Figure 5-9 Visual Simulation from State Route 68

Source: V. E. Tienne 2015

Figure 5-9
Visual Simulation from State Route 68

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Source: V. E. Tienne 2015

Figure 5-10
Visual Simulation from Reservation Road

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Recreational Trail

A private recreational trail that is used only by homeowners and residents of Las Palmas Ranch is located to the south of the project site on the periphery of the existing neighborhood. Based on topography, the project site is not within the viewshed of the recreational trail. Components of the proposed project may be within viewpoints along the future trail should it be constructed.

Light and Glare

The proposed project would introduce new sources of light and potential glare as there would be development on a vacant site.

Applicant Proposed Mitigation Measures

The following mitigation measures intended to reduce impacts to visual resources have been proposed by the applicant.

1. The site shall be landscaped and screened from view from State Route 68, River Road and Las Palmas #1 to the extent feasible. Prior to the issuance of building permits, three (3) copies of a final landscaping plan shall be submitted to the Director of RMA - Planning. The landscaping plan shall be in sufficient detail to identify the location, species, and size of the proposed landscaping and shall include an irrigation plan. The landscaping shall be installed and inspected prior to occupancy. All landscaped areas and/or fences shall be continuously maintained by the applicant and all plant material shall be continuously maintained in a litter-free, weed-free, healthy, growing condition.
2. All exterior lighting shall be unobtrusive, down-lit, harmonious with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. The lighting source shall be shielded and recessed into the fixture. The applicant shall submit three (3) copies of an exterior lighting plan which shall indicate the location, type, and wattage of all light fixtures and include catalog sheets for each fixture. The lighting shall comply with the requirements of the California Energy Code set forth in California Code of Regulations Title 24 Part 6. The exterior lighting plan shall be subject to approval by the Director of RMA-Planning, prior to the issuance of building permits.
3. All new utility and distribution lines shall be placed underground.
4. Colors and materials used for the buildings shall be earth toned to blend with the existing landscape subject to the approval of the Director of Planning.

5.5 IMPACT SUMMARY AND MITIGATION MEASURES

IMPACT The Proposed Project Would have an Adverse Impact on Scenic Vistas and the Existing Viewshed when Viewed from State Route 68, River Road, and Reservation Road and Alter the Existing Visual Character of the Project Site (Less than Significant with Mitigation)

The proposed project would be within the existing viewshed of public areas, including from areas that offer views of scenic vistas and from viewpoints on designated and proposed scenic roadways (State Route 68, River Road and Reservation Road). The proposed project would also alter the existing, natural visual character of the project site. Although the LPRSP FEIR concluded that visual impacts on Highway 68 would be less than significant with full buildout of the specific plan area, including the project site, potential visual impacts of the proposed project are considered a significant adverse environmental impact. Implementation of following mitigation measures would reduce the significant impact to a less-than-significant level.

Mitigation Measures

AES-1 The applicant shall prepare and submit a landscape plan to enhance screening from State Route 68, River Road, Reservation Road, and the adjacent neighborhood and trail. The landscaping plan shall include, but not be limited to, the following:

a. Location, species, and size of plantings, which must be native and drought-tolerant;
b. Mounding, informal massing, or irregularly spaced trees, and plantings;
c. Sufficient native trees and landscaping along the perimeter of the developed area to screen the buildings from State Route 68, River Road, Reservation Road, and the adjacent neighborhood; and
d. Irrigation plan.

The landscape plans shall be subject to review and approval by the Monterey County Resource Management Agency Planning Director, prior to issuance of building permits. The landscaping shall be installed and inspected prior to occupancy. All landscaped areas and/or fences shall be continuously maintained by the project proponent and all plant material shall be continuously maintained in a litter-free, weed-free, healthy, growing condition. This requirement will be included in permit conditions.

AES-2 The applicant shall submit a final plan for colors and materials used for the buildings, which shall be earth toned to blend with the existing vicinity landscape, subject to the approval of the Monterey County Resource Management Agency Planning Director, prior to issuance of building permits.

AES-3 The applicant's final improvement plans shall include construction of all new utility and distribution lines on the project site underground. The improvement plans shall be subject to review and approval of the Monterey County Resource Management Agency Public Works Director, prior to issuance of a grading permit.

Implementation of these mitigation measures will mitigate the impact by requiring the applicant to prepare, implement, and maintain a landscaping plan that will adequately screen the proposed project from vicinity roadways and the adjacent residential neighborhood and trail, utilize colors and materials harmonious with the existing landscape, and require undergrounding all new utility lines on the project site. Although the proposed development would remain partially within the viewshed from surrounding public viewpoints, as displayed in visual simulations prepared for the proposed project, the site design and mitigation measures would reduce public viewshed impacts. Therefore, with the implementation of mitigation measures, impacts would be reduced to a less-than-significant level.

IMPACT The Proposed Project would Introduce New Sources of Light and Glare to the Project Site and Vicinity (Less than Significant with Mitigation)

Implementation of the proposed project would introduce new sources of light and glare to the project site and vicinity. This is considered a significant adverse environmental impact. Implementation of following mitigation measures would mitigate the impact.

Mitigation Measure

AES-4 All exterior lighting shall be unobtrusive, down-lit, harmonious with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. The lighting source shall be shielded and recessed into the fixture. Prior to the issuance of building permits, three (3) copies of an exterior lighting plan which shall indicate the location, type, and wattage of all light fixtures and include catalog sheets for each fixture to the Monterey County Resource Management Agency Planning Director. The lighting shall comply with the requirements of the California Energy Code set forth in California Code of Regulations Title 24 Part 6. The exterior lighting plan shall be subject to approval by the Monterey County Resource Management Agency Planning Director, prior to issuance of a building permit.

Implementation of this mitigation measure would reduce the impact by requiring lighting design and controls for the proposed project. Therefore, with the implementation of mitigation measures, impacts would be reduced to a less-than-significant level.

TABLE OF CONTENTS

6.0 AIR QUALITY 6-1

6.1 Environmental Setting 6-1

6.2 Regulatory Setting 6-9

6.3 Thresholds or Standards of Significance 6-15

6.4 Environmental Impact Analysis 6-17

6.5 Impact Summary and Mitigation Measures 6-21

Figures

No table of figures entries found.

Tables

Table 6-1 Common Air Pollutants 6-3

Table 6-2 Typical Non-road Engine Emissions Standards (g/bhp-hr)..... 6-6

Table 6-3 North Central Coast Air Basin Attainment Status Designations 6-8

Table 6-4 Summary of Ambient Air Quality Data (2013-2015)..... 6-8

Table 6-5 Federal and State Ambient Air Quality Standards 6-10

Table 6-6 CalEEMod Operational Modeling Results, Winter and Summer Emissions (Pounds per Day) 6-19

6.0
Air Quality

This section of the EIR includes evaluation of proposed project impacts on air quality at a level commensurate with the project description. Unless otherwise noted, the discussion in this section is based upon independent site investigation, information found in the *2005 Report on Attainment of the California Fine Particulate Standard in the Monterey Bay Region - Senate Bill 656 Implementation Plan*, *Monterey Bay Air Resources District 2012-2015 Air Quality Management Plan*, *Monterey Bay Unified Air Pollution Control District CEQA Air Quality Guidelines*, California Emissions Estimator Model results (Appendix C), *County of Monterey General Plan*, *Toro Area Plan*, and the *Las Palmas Ranch Specific Plan.*

During the Draft EIR's NOP review period, some members of the public questioned potential air quality impacts of the proposed project. The county's NOP and comment letters are included in Appendix B.

6.1 Environmental Setting

Regional Climate and Topography

The project site is located in the North Central Coast Air Basin (hereinafter "air basin"), which lies along the central coast of California covering an area of approximately 5,159 square miles. The air basin is comprised of several interconnected valleys: a portion of the Santa Clara Valley, San Benito Valley, Salinas Valley, and Carmel Valley. A semi-permanent high-pressure cell in the eastern Pacific Ocean is the basic controlling factor in the climate of the air basin. In the summer, the high-pressure cell is dominant and causes persistent west and northwest winds over the entire California coast. Air descends in the high-pressure cell forming a stable temperature inversion of hot air over a cool coastal layer of air. The onshore air currents pass over cool ocean waters to bring fog and relatively cool air into the coastal valleys. Warmer air aloft acts inhibits vertical air movement.

The generally northwest-southeast orientation of mountain ranges restricts and channels summer on-shore air currents. Surface heating in the interior portion of the Salinas and San Benito valleys creates a weak low pressure, which intensifies on-shore airflows during the afternoon and evening. In the fall, the surface winds become weak, and the marine layer grows shallow, dissipating altogether on some days. Airflow is occasionally reversed in a weak offshore movement, and the relatively stationary air mass is held in place by the high-

pressure cell, which allows pollutants to build up over a period of a few days. It is most often during the fall season that the north or east winds develop, which can transport pollutants from either the San Francisco Bay Area or the Central Valley into the air basin.

During the winter, the high-pressure cell generally migrates southward, reducingits influence on the air basin. Air frequently flows in a southeasterly direction out of the Salinas and San Benito valleys, especially during night and morning hours. While northwest winds are nevertheless still dominant in winter, easterly flows are more frequent. The general absence of deep, persistent inversions and the occasional storm systems usually result in good air quality for the basin as a whole in winter and early spring.

Criteria Air Pollutants and their Effects on Human Health

The six most common and widespread air pollutants of concern, or "criteria pollutants," are ground level ozone, nitrogen oxides, particulate matter, carbon monoxide, sulfur dioxide, and lead. In addition, volatile organic compounds are a key contributor to the criteria pollutants because they react with other substances to form ground level ozone. The primary pollutants of concern in Monterey County are ozone, carbon monoxide, and particulate matter 10 and 2.5 microns or less in size. The common properties, sources, and related health and environmental effects of these pollutants are summarized in Table 6-1, Common Air Pollutants. Air-borne lead and sulfur oxides are not significant pollutants of concern in the region (Monterey Bay Unified Air Pollution Control District 2008, 2013).

Ozone. Ground level ozone is produced by chemical reactions, which are triggered by sunlight, involving nitrogen oxides and volatile organic compounds. Since ozone is not directly emitted to the atmosphere, but is formed because of photochemical reactions, it is considered a secondary pollutant. Ozone is a seasonal problem, occurring roughly from April through October.

Ozone is a strong irritant that attacks the respiratory system, leading to the damage of lung tissue. Asthma, bronchitis, and other respiratory ailments, as well as cardiovascular diseases, are aggravated by exposure to ozone. A healthy person exposed to high concentrations of ozone may become nauseated or dizzy, may develop a headache or cough, or may experience a burning sensation in the chest. Research has shown that exposure to ozone damages the alveoli (the individual air sacs in the lungs where the exchange of oxygen and carbon dioxide between the air and blood takes place). Research has also shown that ozone damages vegetation.

Volatile Organic Compounds (Ozone Precursor). Volatile organic compounds are emitted from a variety of sources, including liquid and solid fuel combustion, evaporation of organic solvents, and waste disposal.

Table 6-1 Common Air Pollutants

Pollutant	Properties	Major Sources	Related Health & Environmental Effects
Ozone (O^3)	Created by the chemical reaction between nitrogen oxides and volatile organic compounds in the presence of heat and sunlight. Ground level ozone is the principal component of smog.	▪ Motor vehicle exhaust; ▪ Industrial emissions; ▪ Gasoline vapors; ▪ Chemical solvents.	▪ Reduced lung capacity; Irritation of lung airways and inflammation; ▪ Aggravated asthma; ▪ Increased susceptibility to respiratory illnesses (i.e. bronchitis).
Volatile Organic Compounds (VOC)	Precursor of ground-level ozone.	▪ Petroleum transfer and storage; ▪ Mobile sources; ▪ Organic solvents.	▪ Potential carcinogen (e.g. benzene); ▪ Toxic to plants and animals.
Nitrogen Oxides (NO_X)	Group of highly organic gases containing nitrogen in varying amounts. Many nitrogen oxides are odorless and colorless.	▪ Motor vehicles; ▪ Electric utilities; ▪ Industrial, commercial, and residential sources that burn fuel.	▪ Toxic to plants; ▪ Reduced visibility; ▪ Respiratory irritant.
Suspended and Fine Particulate Matter (PM_{10}) ($PM_{2.5}$)	Describes particles in the air, including dust, soot, smoke, and liquid droplets. Others are so small that they can only be detected with an electron microscope.	▪ Motor vehicles; ▪ Factories; ▪ Construction sites; ▪ Tilled farm fields; ▪ Unpaved roads; ▪ Wood burning.	▪ Aggravated asthma; ▪ Increases in respiratory symptoms; ▪ Decreased lung function; ▪ Premature death; ▪ Reduced visibility.
Carbon Monoxide (CO)	Colorless, odorless gas that is formed when carbon in fuel is not burned completely.	▪ Fuel combustion; ▪ Industrial processes; ▪ Highly congested traffic.	▪ Chest pain for those with heart disease; ▪ Vision problems; ▪ Reduced mental alertness; ▪ Death (at high levels)

SOURCE: Monterey Bay Unified Air Pollution Control District, August 2008, 2013; U.S. Environmental Protection Agency 2016

Nitrogen Oxides (Ozone Precursor). Most nitrogen oxides are created during combustion of fuels. Nitrogen oxides are a major contributor to ozone formation. Nitrogen dioxide is a reddish-brown gas that can irritate the lungs and can cause breathing difficulties at high concentrations. Like ozone, nitrogen dioxide is not directly emitted, but is formed through a reaction between nitric oxides and atmospheric oxygen. Nitrogen dioxide also contributes to the formation of particulate matter (see discussion below). Nitrogen dioxide concentrations

in the air basin have been well below ambient air quality standards; therefore, nitrogen dioxide concentrations from land use projects are not a concern.

Particulate Matter. Particulate matter is comprised of small, suspended particles, primarily composed of dust particles, nitrates, and sulfates. Particulate matter is classified as under 10 microns (suspended particulate matter or PM_{10}) and under 2.5 microns (fine particulate matter or $PM_{2.5}$). Suspended particulate matter is directly emitted to the atmosphere as a byproduct of fuel combustion, wind erosion of soil and unpaved roads, and from construction or agricultural operations. Small particles are also created in the atmosphere through chemical reactions. Approximately 64 percent of fugitive dust is suspended particulate matter. Minimal grading typically generates about 10 pounds per day per acre on average while excavation and earthmoving activities typically generate about 38 pounds per day per acre.

Although particles greater than 10 microns in diameter can cause irritation in the nose, throat, and bronchial tubes, natural mechanisms remove much of these particles. Particles less than 10 microns in diameter, however, are able to pass through the body's natural defenses and the mucous membranes of the upper respiratory tract and enter into the lungs. The particles can damage the alveoli. The particles may also carry carcinogens and other toxic compounds, which can adhere to the particle surfaces and enter the lungs.

Carbon Monoxide. Carbon monoxide is a component of motor vehicle exhaust, which contributes about 56 percent of all carbon monoxide emissions nationwide. Other non-road engines and vehicles (such as construction equipment and boats) contribute about 22 percent of all carbon monoxide emissions nationwide. Carbon monoxide can cause harmful health effects by reducing oxygen delivery to the body's organs (like the heart and brain) and tissues. Carbon monoxide also contributes to the formation of ground-level ozone.

Higher levels of carbon monoxide generally occur in areas with heavy traffic congestion. In cities and automobile-dependent urban regions, 85 to 95 percent of all carbon monoxide emissions typically comes from motor vehicle exhaust. Concentration of carbon monoxide is a direct function of vehicle idling time and, thus, traffic flow conditions. Transport of carbon monoxide is extremely limited; it disperses rapidly from the source under normal meteorological conditions. Under certain meteorological conditions, however, carbon monoxide concentrations close to a congested roadway or intersection may reach unhealthy levels, affecting local sensitive receptors (residents, school children, hospital patients, the elderly, etc.). Emissions thresholds established for carbon monoxide apply to both direct or stationary sources.

Typically, high carbon monoxide concentrations are associated with roadways or intersections operating at unacceptable levels of service, particularly during peak commute

times. Thus, congested intersections with high volumes of traffic can result in carbon monoxide "hot spots," where localized high concentrations of carbon monoxide occur.

Toxic Air Contaminants and their Effects on Human Health

Toxic air contaminants are pollutants that may be expected to result in an increase in mortality or serious illness or may pose a present or potential health hazard. Health effects include cancer, birth defects, neurological damage, damage to the body's natural defense system, and diseases that lead to death. Toxic air contaminants can be classified as either carcinogens or non-carcinogens. The air district considers an incremental risk of greater than 10 cases per million, over a 70-year exposure period for the Maximally Exposed Individual to be a significant impact. The 10 excess cases per million equates to the possibility of causing 10 additional cancer cases in a population of one million. This risk level is also used by the Air Toxics "Hot Spots" (AB 2588) program and Proposition 65 as the public notification level for air toxic emissions from existing sources.

Diesel Emissions. Diesel exhaust is the predominant toxic air contaminant in urban air and is estimated to represent about two-thirds of the cancer risk from toxic air contaminants. Diesel engines emit a complex mix of pollutants including nitrogen oxides, particulate matter, and toxic air contaminants. The most visible constituents of diesel exhaust are very small carbon particles or soot, known as diesel particulate matter. Diesel exhaust also contains over 40 cancer-causing substances, most of which are readily adsorbed on the soot particles. Among the toxic air contaminants contained in diesel exhaust are dioxin, lead, polycyclic organic matter, and acrolein. Short-term exposure to diesel particulate matter is associated with variable irritation and inflammatory symptoms. Diesel engine emissions are responsible for a majority of California's estimated cancer risk attributable to air pollution. Diesel particulate matter is a significant fraction of California's particulate pollution (California Air Resources Board 2005, California Office of Environmental Health Hazard Assessment 2001).

Diesel exhaust is especially common during the grading stage of site preparation and construction, when most heavy equipment is used, and adjacent to heavily trafficked roadways where diesel trucks are common. The United States Environmental Protection Agency (EPA) regulates diesel engine design and fuel composition at the federal level, and has implemented a series of measures since 1994 to reduce nitrogen oxides and particulate emissions from off-road and highway diesel equipment. Ultralow sulfur off-road and highway diesel fuels, 15 parts per million (ppm) became the standard in California by 2007, replacing the previous 500 ppm fuel (Clean Diesel Fuel Alliance 2016).

EPA Tier 1 non-road diesel engine standards were introduced in 1996, Tier 2 in 2001, Tier 3 in 2006, and Tier 4 in 2011, with final Tier 4 in 2014 (DieselNet 2016). Table 6-2, Typical Non-

Road Engine Emissions Standards compares emissions standards for NOx and particulate matter from non-road engine Tier 1 through Tier 4 for typical engine sizes. As illustrated in the table, emissions for these pollutants have decreased significantly for construction equipment manufactured over the past 20 years, and especially for construction equipment manufactured in the past two years.

Table 6-2 Typical Non-Road Engine Emissions Standards (g/bhp-hr)

Engine Tier	NOx Emissions			Particulate Emissions		
	100-175 HP	175-300 HP	300-600 HP	100-175 HP	175-300 HP	300-600 HP
Tier 1	6.90	6.90	6.90	--	0.40	0.40
Tier 2	6.90 †	6.90 †	6.90 †	0.22	0.15	0.15
Tier 3	6.90 †	6.90 †	6.90 †	0.22 †	0.15 †	0.15 †
Tier 4	0.30	0.30	0.30	0.015	0.015	0.015

SOURCE: Dieselnet.com/standards/us/nonroad.php accessed November 15, 2016.
† - standard not adopted; standard shown is for prior tier

In California, non-road equipment fleets can retain older equipment, but fleets must meet averaged emissions limits, new equipment must be Tier 3 or better after January 2018 (for large and medium fleets) or January 2023 (for small fleets), and over time the older equipment must be fitted with particulate filters. Large and medium fleets have increasingly strict fleet compliance targets through 2023 and small fleets through 2029. A small fleet is one that has total horse power of 2,500 or less; a medium fleet is one that has total horsepower of between 2,500 and 5,000. All non-road equipment operating in California is registered with the California Air Resources Board (CARB), which issues an equipment identification number (California Air Resources Board 2016).

Asbestos. Asbestos is found in several kinds of building materials and also occurs naturally in serpentine rocks and soils formed from serpentine rocks (California Department of Conservation, Division of Mines and Geology 2000). Asbestos had formerly been mined in southern Monterey County, with one of the largest asbestos mines in California located near the San Benito County/Fresno County lines. This mine closed in 2002 (United States Geological Survey and California Geological Survey 2011). Asbestos is generally not harmful when asbestos-containing materials are left undisturbed, but when soils or materials containing asbestos are disturbed, microscopic fibers can be dislodged and remain in the air for long periods. If asbestos fibers are inhaled they can become lodged in body tissues and pose a serious health threat, especially lung disease. Handling and disposal of asbestos containing materials is regulated by federal and state law. Since the project site is undeveloped it does not contain any buildings or structures that could have asbestos containing materials. The project site's soils are composed of deep alluvial soils and the site

does not contain serpentine rocks, although naturally occurring asbestos has been discovered in some Salinas Valley soils (United States Geological Survey and California Geological Survey 2011).

Construction Emissions

Emissions generated during construction are "short-term" in the sense that they would be limited to the solely to periods of site development and construction. Short-term construction emissions are typically generated by the use of heavy equipment, the transport of materials, and construction employee commute trips. Construction-related emissions consist primarily of reactive organic gasses, nitrogen oxides, suspended particulate matter, and carbon monoxide. Emissions of reactive organic gasses, nitrogen oxides, and carbon monoxide are generated primarily by the operation of gas and diesel-powered motor vehicles, asphalt paving activities, and the application of architectural coatings. Suspended particulate matter emissions are generated by wind erosion of exposed graded surfaces and diesel engines.

Stationary Source Emissions

Stationary sources include factories, boilers, generators, and gasoline dispensing stations, all of which require an operating permit from the Monterey Bay Area Air Resources Board (air district).

Sensitive Receptors

Although air pollution can affect all segments of the population, certain groups are more susceptible to its adverse effects than others. Children, the elderly, and the chronically or acutely ill are the most sensitive population groups. These sensitive receptors are commonly associated with specific land uses such as residential areas, schools, parks, retirement homes, and hospitals. In addition, certain air pollutants, such as carbon monoxide, only have significant effects if they directly affect a sensitive population. Potential sensitive receptors near the project site include residents of the adjacent Toro area, specifically residents of the adjacent Las Palmas subdivision.

Air Basin Attainment Status

In accordance with the Clean Air Act, CARB is required to designate regions of the State as attainment, non-attainment, or unclassified with regard to that region's compliance with criteria air pollutants standards. An "attainment" designation for a region signifies that pollutant concentrations do not violate the standard for a specified pollutant in that region. A "non-attainment" designation indicates that a pollutant concentration violated the standard at least once. An "unclassified" designation signifies that available data does not support either an attainment or non-attainment status. The California Clean Air Act divides designations into moderate, serious, and severe air pollution attainment categories, with

increasingly stringent control requirements mandated for each category. The air basin is in non-attainment with State mandated thresholds for ozone and suspended particulate matter. Table 6-3, North Central Coast Air Basin Attainment Status Designations, identifies the current status within the air basin for each criteria pollutant.

Table 6-3 North Central Coast Air Basin Attainment Status Designations

Pollutant	State	Federal
Ozone (O^3)	Non-Attainment	Attainment
Inhalable Particulates (PM_{10})	Non-Attainment	Attainment
Fine Particulates ($PM_{2.5}$)	Attainment	Attainment
Carbon Monoxide (CO)	Monterey Co. - Attainment	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Attainment

SOURCE: Monterey Bay Air Resources District, March 2017

Ambient Air Quality

Table 6-4, Summary of Ambient Air Quality Data (2013-2015), summarizes the most recent three years of published monitoring data from the district's monitoring station.

According to the air district, there are no known CO "hot spots" or localized areas containing high concentrations of carbon monoxide in Monterey County (Bob Nunes, pers. com., February 24, 2017).

Table 6-4 Summary of Ambient Air Quality Data (2013-2015)

Pollutant and Measurement Standard	2013[1]	2014[1]	2015[1]
Ozone (O_3)			
Maximum concentration, 1-hr/8-hr (ppm)	0.065/0.062	0.066/0.062	0.068/0.061
# days state standard (1-hr/8-hr) exceeded[3]	0/0	0/0	0/0
# days federal standard (8-hr) exceeded[3]	0	0	0
Suspended Particulate Matter (PM_{10})			
Maximum 24-hour concentration ($\mu g/m^3$) [2]	NA	NA	NA
Estimated number of days state standard exceeded[3]	NA[4]	NA[4]	NA[4]
Estimated number of days federal standard exceeded[3]	NA[4]	NA[4]	NA[4]
Fine Particulate Matter ($PM_{2.5}$)			
Maximum 24-hour concentration ($\mu g/m^3$) [2]	19.7	20.2	22.8
Estimated number of days federal standard exceeded [3]	0	0	0

SOURCE: CARB 2017. Aerometric Data Analysis and Measurement System, as found at http://www.arb.ca.gov/adam/

NOTES:
1. Ozone and particulate data obtained from the Salinas #3 monitoring station
2. µg/m3 = Micrograms per Cubic Meter
3. Estimated average number of days per year
4. Not enough data available.

Ambient air pollutant levels are monitored at several monitoring stations in the air basin. Air quality monitoring stations usually measure pollutant concentrations ten feet above-ground level; therefore, air quality is often referred to in terms of ground-level concentrations.

Local ambient air quality in Monterey County is monitored by the air district in Carmel Valley (Ford Road), King City (415 Pearl Street), and Salinas (#3). The air district monitoring station closest to the project site is located near the intersection of East Laurel Drive and Constitution Boulevard in Salinas, approximately six miles northeast of the project site.

6.2 REGULATORY SETTING

Federal

The Federal Clean Air Act, adopted by Congress in 1970 and amended in 1990, provides the basis for Federal air quality standards. The Clean Air Act is implemented by the U.S. EPA. The Clean Air Act established two types of national air standards: primary and secondary. Primary standards set limits to protect public health, including the health of sensitive persons such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

Federal and State Ambient Air Quality Standards

Ambient air quality is described in terms of compliance with State and Federal standards. The State and Federal clean air acts established two types of National Ambient Air Quality Standards for each criteria pollutant. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings.

In general, criteria pollutants are pervasive constituents, such as those emitted in vast quantities by the combustion of fossil fuels. Both the State and Federal governments have developed ambient air quality standards for the identified criteria pollutants, which include ozone, carbon monoxide, nitrogen oxides, sulfur dioxide, PM_{10}, and $PM_{2.5}$. Table 6-5, Federal and State Ambient Air Quality Standards, lists State and Federal ambient air quality standards for criteria air pollutants. The State standards generally have lower, more strict thresholds than the Federal standards, yet both are applicable to the proposed project. When

thresholds are exceeded at regional monitoring stations, an "attainment plan" must be prepared that outlines how an air quality district will achieve compliance. Generally, these plans must provide for district-wide emission reductions of five percent per year averaged over consecutive three-year periods.

Table 6-5 Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]		Federal Standards[2]			
		Concentration		Primary[3,4]		Secondary[3,5]	
		ppm	µg/m³	ppm	µg/m³	ppm	µg/m³
Ozone[6]	1 Hour	0.09	180	-	-	-	-
	8 Hour	0.07	137	0.070	137	0.070	137
PM_{10}[7]	24 Hour	-	50	-	150	-	150
	Annual	-	20	-	-	-	-
$PM_{2.5}$[7]	24 Hour	-	-	-	35	-	35
	Annual	-	12	-	12	-	15
Carbon Monoxide (CO)	8 Hour	9.0	10	9	10	-	-
	1 Hour	20.0	23	35	40	-	-
Nitrogen Dioxide (NO_2)[8]	Annual	0.030	57	0.053	100	0.053	100
	1 Hour	0.18	339	0.100	188	-	-
Sulfur Dioxide (SO_2)[9]	Annual	-	-	0.030	See note[8]	-	-
	24 Hour	0.04	105	0.14	See note[8]	-	-
	3 Hour	-	-	-	-	0.5	1,300
	1 Hour	0.25	655	0.075	196	-	-
Lead[10,11]	30 Day Average		1.5	-	-	-	-
	3 month revolving	-	-	-	0.15	-	0.15
	Calendar Quarter	-	-	See note[11]	1.5	See note[11]	1.5
Visibility Reducing Particles[12]	8 Hour	See note[12]		No Federal Standards			
Sulfates	24 Hour	-	25				
Hydrogen Sulfide	1 Hour	0.03	42				
Vinyl Chloride[10]	24 Hour	0.01	26				

SOURCE: CARB, May 4, 2016. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf.

NOTES:

1. California standards for ozone, carbon monoxide, sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter—PM10, PM2.5, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m3 is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact EPA for further clarification and current federal policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
5. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
6. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
7. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m3 to 12.0 µg/m3. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 µg/m3, as was the annual secondary standard of 15 µg/m3. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over three years.
8. To attain the 1-hour national standard, the three-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
9. On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the three-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
10. CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
11. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
12. In 1989, CARB converted the general statewide 10-mile visibility standard to instrumental equivalents, which is "extinction of 0.23 per kilometer" for the statewide standard.

The U.S. EPA has established National Emission Standards for Hazardous Air Pollutants, which are applicable to asbestos, beryllium, mercury, vinyl chloride, benzene, arsenic, and radon/radionuclides, which are regulated by source-specific rules. Examples of regulated sources include asphalt processing, boat manufacturing, chromium electroplating, coke ovens, dry cleaning, leather finishing, plywood manufacturing, polymer and resin manufacturing, and surface coating of various products. The standards for a particular source category require the maximum degree of emission reduction that the EPA determines to be achievable, which is known as the Maximum Achievable Control Technology.

State and Regional

The Toxic Air Contaminant Identification and Control Act (AB 1807, Tanner 1983) created California's program to reduce exposure to airborne toxics. The Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, Connelly 1987) supplements the AB 1807 program, by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

Under AB 1807, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In accordance with California Health and Safety Code section 39666(f), CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community." AB 1807 also requires CARB to use available information gathered from the AB 2588 program to include in the prioritization of compounds.

The Office of Environmental Health Hazard Assessment assists CARB by developing the health assessment part of the toxic air contaminants identification documents; reviews facility risk assessments for the "Hot Spots" Program; is developing new risk assessment guidelines for the "Hot Spots" Program; and is the lead agency for Proposition 65. The Department of Pesticide Regulation regulates toxic air contaminants that are also pesticides. No quantified concentration thresholds are established, because the State has determined there is insufficient available scientific evidence to support the identification of a threshold exposure level. As noted previously, the air district has not identified any “Hot Spots” in Monterey County.

Diesel-powered construction equipment is regulated at both the Federal and State levels by the U.S. EPA and CARB. Beginning in 1996, new diesel equipment engines were required to meet emission standards. EPA Tier 2 diesel engine standards were implemented from 2001 and 2006, Tier 3 standards from 2006-2008, Engines are now in Tier 4 designs, reducing emissions of NOx and PM_{10} significantly since the first requirements were introduced. CARB requires that equipment fleets’ average emissions meet increasingly stringent standards, and requires the phase-in of diesel particulate matter filters on older equipment. With exemptions for certain specialized equipment, CARB restricts engine idling time to five minutes.

California’s Regulation for In-use Off-road Diesel Vehicles establishes a state program to reduce nitrogen oxides and particulate emissions from older construction equipment. Several provisions of the regulation are in force (idling restrictions and reporting), and other provisions are being phased in from 2014 to 2029 (fleet composition). As the regulation is

fully implemented, it will reduce construction equipment emissions over time (California Air Resources Board 2014b). Ultralow sulfur diesel fuel, at 15 parts per million (ppm), has been the standard in California for both on-road and off-road vehicles since 2006 (Clean Diesel Fuel Alliance 2014). California is phasing in the use of particulate matter filters on heavy on-road trucks, beginning in 2014, with all heavy trucks to be compliant by 2020 (California Air Resources Board 2014a). The Tier 4 engines and ultralow sulfur fuels will reduce annual emissions by an estimated 738,000 tons of NOx and 129,000 tons of particulate emissions (DieselNet 2016).

Monterey Bay Air Resources District

The Monterey Bay Air Resources District (air district) is the regional agency with responsibility for monitoring air quality and achieving attainment of State and Federal standards in, Monterey, Santa Cruz and San Benito Counties. The air district exercises its jurisdiction within the air basin. The air district is charged with regulatory authority over stationary sources of air emissions, monitoring air quality within the air basin, providing guidelines for analysis of air quality impacts pursuant to CEQA, and preparing an air quality management plan to maintain or improve air quality in the air basin.

Air Quality Management Plan. The air district is delegated with local responsibility to implement both Federal and State mandates for improving air quality in the air basin through implementation of an air quality plan. The air district adopted the Air Quality Management Plan for the Monterey Bay Region ("Air Quality Management Plan") in 1991 and has completed several updates in subsequent years, most recently in 2017 (see also the 2012-2015 Air Quality Management Plan below). The Air Quality Management Plan presents measures to control emissions of volatile organic compounds from stationary and mobile sources in order to meet the ozone standard mandated by the California Clean Air Act. In 2006, CARB made the ambient air quality standards more stringent by adding an 8-hour ozone average to the standard.

The Air Quality Management Plan outlines the steps that will be taken to come into attainment with the state and federal standards, and also requires measures to further reduce ozone levels in the air. The principal strategies for ozone reduction that are relevant to the proposed project are construction equipment emissions control measures, transportation control measures, and low-NOx gas-fired water heater and furnace requirements. The Air Quality Management Plan transportation control measures reflect relevant projects included in Monterey Bay Metropolitan Transportation Improvement Program.

To achieve and maintain ambient air quality standards, the air district also has adopted various rules and regulations for the control of airborne pollutants. Air district rules and regulations applicable to the proposed project include the following:

Rule 402 (Nuisances). The purpose of this rule is to prohibit emissions that may create a public nuisance. Applies to any source operation that emits or may emit air contaminants or other materials.

Rule 425 (Use of Cutback Asphalt). The purposed of this rule is to limit emissions of vapors of organic compounds from the use of cutback and emulsified asphalt. This rule applies to the manufacture and use of cutback, slow cure, and emulsified asphalt during paving and maintenance operations.

Rule 426 (Architectural Coatings). The purpose of this rule is to limit emissions of volatile organic compounds (ROG, NOx, etc.) from architectural coatings.

Projects related directly to population growth will generate population-related emissions (e.g., motor vehicles, residential heating and cooling emissions). These emissions have been forecast in the Air Quality Management Plan using population forecasts adopted by the Association of Monterey Bay Area Governments (AMBAG). Thus, population-related projects which are consistent with AMBAG regional population forecasts are consistent with the Air Quality Management Plan. For a proposed residential project, or institutional project, such as the proposed care facility, that has a predictably stable onsite resident population, consistency is determined by comparing the project population at the year of project completion with the forecast for the appropriate five-year increment (e.g., if project completion is 2020, the project would be compared with year 2020 forecasts) for the jurisdiction in which the project is located. A proposed residential project is consistent with the Air Quality Management Plan if the population increase resulting from the project will not cause the estimated cumulative population (i.e., existing population plus population from locally-approved and unconstructed projects) to exceed forecasts for the next five-year increment.

Air District 2012-2015 Air Quality Management Plan (2017). This is the seventh update to the original 1991 Air Quality Management Plan. This report is an update to the elements included in the 2008 Air Quality Management Plan based on a review of the time period 2012-2015. It shows that the region continues to make progress toward meeting the state ozone standard. The air district's focus continues to be on achieving the 8-hour component of the ozone standard since the region has attained the 1-hour standard. The primary elements from the 2008 Air Quality Management Plan updated in this revision include the air quality trends analysis, emission inventory, and mobile source programs. The 2012-2015 Air Quality Management Plan incorporates the 2014 Association of Monterey Bay Area Governments population projections.

Air District CEQA Air Quality Guidelines (2008). The purpose of the air district air quality guidelines is to inform public agencies, consultants, project proponents and the general

public of the air district's adopted thresholds of significance and to provide guidance in the review and evaluation of air quality impacts of projects that are subject to CEQA. The air quality guidelines are intended to provide uniform procedures for assessing air quality impacts and preparing the air quality section of environmental documents. They are also intended to help streamline the CEQA review process for project proponents, lead agencies, and the air district.

County

Monterey County General Plan

The following policies in the General Plan are applicable to air quality.

Policies

> **OS-10.2** Mass transit, bicycles, pedestrian modes of transportation, and other transportation alternatives to automobiles shall be encouraged.
>
> **OS-10.7** Use of the best available technology for reducing air pollution emissions shall be encouraged.
>
> **OS-10.9** The County of Monterey shall require that future development implement applicable Monterey Bay Unified Air Pollution Control District control measures.
>
> Applicants for discretionary projects shall work with the Monterey Bay Unified Air Pollution Control District to incorporate feasible measures that assure that health-based standards for diesel particulate emissions are met. The County of Monterey will require that future construction operate and implement MBUAPCD PM_{10} control measures to ensure that construction-related PM_{10} emissions do not exceed the MBUAPCD's daily threshold for PM_{10}. The County shall implement MBUAPCD measures to address off-road mobile source and heavy duty equipment emissions as conditions of approval for future development to ensure that construction-related NOx emissions from non-typical construction equipment do not exceed the MBUAPCD's daily threshold for NOx.

6.3 THRESHOLDS OR STANDARDS OF SIGNIFICANCE

Based on the air quality guidelines (Monterey Bay Unified Air Pollution Control District 2008, p. 5-14), and air district guidance on consistency with the Air Quality Management Plan (Monterey Bay Air Resources District 2017), the project would have a significant air quality impact if it would:

- Conflict with or obstruct implementation of the Air Quality Management Plan:

- Exceed AMBAG population forecasts for the jurisdiction.

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation:
  - 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;
  - 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;
  - Emit 82 pounds per day or more of suspended particulate matter from vehicle travel on unpaved roads; or
  - Directly emit 150 pounds per day or more of sulfur oxides.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone/ozone precursors, and suspended particulate matter) under an applicable federal or state ambient air quality standard.
- Expose existing or reasonably foreseeable sensitive receptors to substantial pollutant concentrations:
  - Cause or contribute to an exceedance of a carbon monoxide standard as measured by Level of Service (LOS) degradation at a project-affected intersection and confirmed by dispersion modeling. The air quality guidelines require carbon monoxide hot spot analysis under the following project conditions:
    - Intersections degrading to below LOS D;
    - Volume to capacity ratio increases by 0.05 at LOS E or F intersections;
    - The delay at LOS E or F intersections increases by 10 seconds or more; or
    - Reserve capacity at un-signalized LOS E or F intersections decreases by 50 or more.
  - Cause a violation of suspended particulate matter standard at a sensitive receptor.
  - Expose sensitive receptors or the general public to substantial levels of toxic air contaminants if the source of the contaminants results in an additional cancer risk of ten in one million or greater over a 70-year exposure period, for the maximally exposed individual.
- Create or expose a substantial number of people to objectionable odors.

6.4 ENVIRONMENTAL IMPACT ANALYSIS

Consistency with the 2012-2015 Air Quality Management Plan

The proposed project would not conflict with the 2012-2015 Air Quality Management Plan. 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 Air Quality Management Plan using population forecasts adopted by AMBAG. Population-related projects that are consistent with these forecasts are consistent with the 2012-2015 Air Quality Management Plan. For cumulative impacts, the air district recommends that projects be assessed for consistency with the Air Quality Management Plan. The Air Quality Management Plan consistency was determined using the air district's 2011 Consistency Determination Procedure for Residential Development Projects and the AMBAG regional growth forecast data presented in Appendix A of the 2012-2015 Air Quality Management Plan. The 2008 AMBAG regional growth forecast data in the Consistency Determination Procedure spreadsheet was updated with the 2014 AMBAG regional growth forecast data for unincorporated Monterey County. This approach was approved by MBARD (Bob Nunes, pers. com., March 31, 2017).

The proposed project, was evaluated for consistency using an anticipated buildout/occupancy year of 2020. The results of the evaluation process are included as Appendix C. The evaluation determined that the proposed project would be consistent with the Air Quality Management Plan at 2020.

According to the Monterey Bay Area 2014 Regional Growth Forecast (AMBAG 2014), the unincorporated Monterey County population was 101,530 in 2015. The estimated population for 2020 is anticipated to be 102,847. The 2014 AMBAG population projections are based upon an anticipated 0.16 percent annual growth rate. The AMBAG forecast reported that the projected housing unit requirements are expected to be 39,337 in 2020. Recent data from the County indicates existing housing stock consists of approximately 38,683 total housing units (County of Monterey 2015, p.23) with an additional 368 approved housing units (Luke Connolly, pers. com., March 28, 2017).

At project buildout (estimated 2020), the proposed project would provide housing for approximately 128 persons, based on a 90 percent occupancy rate of the total beds (142) available at the proposed facility. The 368 approved housing units in unincorporated Monterey County would provide housing for approximately 960 persons based on the 2020 AMBAG forecast factor of 2.61 persons per dwelling unit. The proposed project and the approved housing units would increase the county's unincorporated population by a total of

1,088 persons. The increase in the county's total population resulting from development of the proposed project and approved housing units would be less (a total of 102,618 persons) than the AMBAG 2020 projections (102,847 persons) upon which the Air Quality Management Plan is based.

The increase in population generated by the proposed project is consistent with air district air quality planning efforts.

Short-term Construction Impacts

The project site is 15.64 acres and initial site preparation and mass grading activities could exceed 2.2 acres per day. Site improvements conducted in later phases also could include grading or other light earth movement exceeding 8.1 acres in a day. According to the air district's CEQA guidelines, a project that includes excavation or grading to that extent would generate dust that would exceed the air district standards (82 lbs per day) for suspended particulate matter (PM_{10}), which also would contribute to the air basin's nonattainment status for PM_{10}.

Mobile and Area Source Emissions

Emissions modeling for the proposed project was conducted using the California emissions estimator model (CalEEMod). The CalEEMod platform estimates both project mobile-source and operational emissions, including vehicular, direct, and indirect emissions. The model also estimates greenhouse gas emissions from land development projects. The model contains default data for vehicular emissions (e.g., meteorology, source inventories, energy and water consumption, emission factors, trip lengths, etc.) provided by various California air districts and approved by CARB, to account for local requirements and conditions. Direct emissions include natural gas combustion associated with the heating of water and space, along with the emissions from use of gas-powered landscape equipment. Indirect emissions include off-site generation of electricity, and off-site processes associated with the land use, such as water treatment and delivery. Vehicular emission rates of volatile organic compounds and nitrogen oxides are sensitive to the year of analysis because emissions rates are decreasing as vehicles with more effective emission controls dominate the fleet mix. Construction of all components, casitas units, assisted living and memory care facitlities, of the proposed project are estimated to be completed in 2020. The anticipated operational year for the analysis performed for the proposed project is the model's default operational date of 2020 (Zulbreti, Andrea. Email message to consultant, 9 April 2017).

Model inputs include air basin information from the air district, and project-related inputs based upon the amount and type of existing and proposed land uses. Detailed CalEEMod results are presented in Appendix C.

The proposed project would result in new sources of mobile and area source emissions. Operational criteria air pollutants emissions are reported as winter and summer emissions. The CalEEMod modeling results for the proposed project (105 dwelling units and related infrastructure) are summarized in Table 6-6, CalEEMod Operational Modeling Results Winter and Summer Emissions (Pounds per Day).

As summarized in Table 6-6, the proposed project would not result in unmitigated or mitigated operational winter or summer emissions that exceed the air district thresholds for ROG, NOx, PM_{10}, or CO. Therefore, the proposed project operations would result in a less-than-significant impact associated with area and mobile source emissions.

Table 6-6 CalEEMod Operational Modeling Results, Winter and Summer Emissions (Pounds per Day)

	Reactive Organic Gases (ROG)	Nitrogen Oxides (NO_x)	Suspended Particulate Matter (PM_{10})	Carbon Monoxide (CO)
Winter Emissions				
Unmitigated	4.66	3.91	1.65	17.11
Mitigated	4.66	3.91	1.65	17.11
Percent Reduction	0.00	0.00	0.00	0.00
Summer Emissions				
Unmitigated	4.71	3.70	1.65	16.75
Mitigated	4.71	3.70	1.65	16.75
Air District Thresholds	*137*	*137*	*82*	*550*
Percent Reduction	0.00	0.00	0.00	0.00

SOURCE: Monterey Bay Air Resources Board and EMC Planning Group Inc. 2017

Carbon Monoxide Hot Spots

The proposed project would generate approximately 22 vehicle trips during the AM peak-hour and 33 vehicle trips during the PM peak-hour. The project will add approximately two morning peak hour trips and four evening peak-hour trips to the two-lane section of State Route 68 immediately west of the Toro Park interchange. Project traffic will dissipate along the corridor at the many cross roads including Torero Drive, San Benancio Road, Corral de Tierra Road and Laureles Grade, resulting in less than one morning peak hour trip and about two evening peak hour trips west of Laureles Grade. Project traffic will be at or below one peak-hour trip west of State Route 218. Although Highway 68 has been determined to

currently operate at Level of Service F, project traffic will have no effect on State Route 68 traffic operations. According to the air district, there are no known CO "hot spots" or localized areas containing high concentrations of carbon monoxide anywhere in Monterey County (Bob Nunes, pers. com., February 24, 2017), therefore, modeling for CO emissions along State Route 68 was not conducted. Development and operation of the proposed project could not create or contribute to unacceptable levels of CO at the studied roadways in the site vicinity.

Diesel Exhaust

Diesel exhaust includes air contaminants that can cause adverse health effects. Development of the project site would likely utilize diesel-fueled heavy equipment, which would increase exposures of diesel exhausts to existing residences located in the residential subdivision east of the proposed project site. Diesel-powered trucks and equipment would emit NOx, acrolein, and diesel particulate matter during the construction phase. Construction equipment can emit substantial amounts of NOx that could have a small, but cumulative effect on ozone concentrations.

Calculating ROG and NOx emissions from typical construction equipment is not required by the air district because temporary emissions of these ozone precursors have been accommodated in State- and federally-required air plans (Monterey Bay Unified Air Pollution Control District 2008, p. 7-1). Therefore, the air quality impacts of construction ROG and NOx emissions are less than significant.

Construction activities associated with the proposed project would likely involve use of the heavy-duty off-road equipment and large trucks that use diesel fuel and emissions of diesel particulate matter. CARB's Regulation for In-use Off-road Diesel Vehicles establishes a State program to reduce emissions from older construction equipment. Equipment built to EPA Tier 4 diesel engine standards and utilizing ultralow sulfur fuel would result in diesel emissions that are substantially lower than older equipment. However, older equipment not meeting the Tier 4 standards would result in greater emissions and increased risks of exposure to them, which is a potentially significant air quality impact.

Odors

The proposed project includes the construction of a senior living community and would not result in any objectionable odors during the operational phase. There may be nuisance diesel odors associated with operation of diesel construction equipment on-site (primarily during initial grading phases), but this effect would be localized, sporadic, and short-term in nature. The air district does not regulate odor emissions other than through its nuisance rule. Therefore, temporary impacts from nuisance diesel odors to nearby residential receptors would be a less-than-significant impact.

6.5 IMPACT SUMMARY AND MITIGATION MEASURES

IMPACT Construction Emissions that Contribute to the Air Basin's Non-Attainment Status (Less than Significant Impact with Mitigation)

The proposed project would generate dust and other emissions from construction equipment during site preparation and construction activities, which would contribute to the air basin non-attainment status for PM_{10}. The project's contribution to this cumulative regional effect is considered significant.

The air district has identified the following feasible measures, that when implemented, reduce the impacts of construction dust emissions to a less-than-significant level.

Mitigation Measures

AQ-1 Prior to issuance of any grading or building permits, developers of the project site shall prepare a grading plan subject to review and approval by the Monterey County Resource Management Agency Planning Director. In the event that ground disturbance exceeds 2.2 acres per day for initial site preparation activities that involve extensive earth moving activities (grubbing, excavation, rough grading), and 8.1 acres per day for activities that involve minimal earth moving (e.g. finish grading) these limits, the required grading plans shall include the following dust control measures:

a. Water all active construction sites continuously. Frequency should be based on the type of operation, soil, and wind exposure;
b. Prohibit all grading activities during periods of high wind (over 15 mph);
c. Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days);
d. Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseed area;
e. Maintain at least 1'-0" of freeboard on haul trucks;
f. Cover inactive storage piles;
g. Sweep streets if visible soil material is carried out from the construction site;
h. Limit the area under construction at any one time.

AQ-2 Prior to commencement of construction activities, the developer and/or contractor shall appoint a construction foreman to act as site monitor to ensure that the dust control measures are implemented. Evidence of implementation shall be submitted in written form to the Monterey County Resource Management Agency Planning Director within three days of commencement of grading, and

monthly thereafter as long as grading occurs. In addition, a publicly-visible sign written in English and Spanish with the telephone number and person to contact regarding dust complaints should be posted and continuously maintained at the project site during grading and construction activities. This person shall respond and take corrective action within 48 hours of receipt of any dust-related complaints. The phone number of the air district shall also be visible to ensure compliance with rule 402 (nuisance).

Implementation of Mitigation Measures AQ-1 and AQ-2 would reduce dust emissions generated by construction activities that could contribute to the air basin non-attainment status. Therefore, with the implementation of these mitigation measures, dust emissions impacts would be reduced to a less than significant level.

IMPACT Exposure of Sensitive Receptors to Construction Dust and Diesel Exhaust Emissions (Less than Significant with Mitigation)

Construction activities associated with the proposed project would likely involve use of heavy-duty off-road equipment and large trucks that use diesel fuel and emissions of diesel particulate matter. The proposed project would expose sensitive receptors to criteria air pollutant emissions from construction dust, off-road equipment, and from trucks hauling debris and delivering materials during construction activities. There are no hospitals, convalescent homes or schools in the immediate vicinity of the project site. However, potential sensitive receptors are located immediately to the east of the site in the existing residential neighborhood, commonly known as Las Palmas Phase 1. During construction activities on the project site, these sensitive receptors could be exposed to substantial PM_{10} and equipment exhaust emissions. This is considered a potentially significant adverse environmental impact. Implementation of Mitigation Measures AQ-1 and AQ-2 would reduce dust emissions generated by construction activities that could affect nearby residences. Implementation of the following mitigation measure would reduce construction equipment exhaust emissions from older equipment and vehicles (NOx and diesel particulate matter) to less than significant.

Mitigation Measure

AQ-3 Prior to the onset of site preparation, grading and construction activities, the project applicant(s) or developer(s) shall require in construction contracts that all off-road construction vehicles and all construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. The developer shall reduce nitrogen oxides exhaust and particulate matter emissions by implementing the following measures prior to the start of construction:

- Contractors shall install temporary electrical service whenever possible to avoid the need for independently-powered equipment (e.g. compressors).

- Signs at the construction site shall be clearly visible to advise that that diesel equipment standing idle for more than two minutes within 200 feet of sensitive receptors shall be turned off. This would include trucks waiting to deliver or receive soil, aggregate, or other bulk materials. Rotating drum concrete trucks may keep their engines running continuously if on-site and staged at least 100 feet away from residential areas.
- Properly tune and maintain equipment for low emissions.
- Stage large diesel powered equipment at least 200 feet from any sensitive land uses (e.g., occupied residences).
- All equipment shall be checked by a certified visible emissions evaluator. All non-road diesel construction equipment shall at a minimum meet Tier 3 emission standards listed in the Code of Federal Regulations Title 40, Part 89, Subpart B, §89.112.

This mitigation measure is consistent with the measures recommended in the air district's air quality guidelines (Table 8-3) that limit the number of vehicles, type of fuel used, hours of daily operation and duration of use. The project applicant(s) or developer(s) shall submit evidence demonstrating compliance with Mitigation Measure AQ-3 to the Monterey County Resources Management Agency Planning Directorfor review and approval. Implementation of Mitigation Measure AQ-3 would reduce and subsequently limit exposure to construction exhaust emissions and ensure that construction emissions are reduced to a less than significant level.

IMPACT Exposures to New Sources of Toxic Air Contaminants (Less than Significant Impact with Mitigation)

The proposed project is a senior living community located adjacent to a residential neighborhood. Diesel exhaust from construction equipment has the potential to emit toxic air contaminants and increase exposures to residents at the adjacent neighborhood.

Mitigation Measure AQ-3 would reduce and limit exposure of toxic air contaminants to nearby residences from construction equipment through implementation of several measures prior to and during construction activities. Implementation of this mitigation measures would ensure that diesel exhaust emissions from construction equipment are reduced to a less than significant level at nearby houses.

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TABLE OF CONTENTS

7.0 BIOLOGICAL RESOURCES 7-1

7.1 Environmental Setting 7-1

7.2 Regulatory Setting 7-17

7.3 Thresholds or Standards of Significance 7-21

7.4 Environmental Impact Analysis 7-22

7.5 Impact Summary and Mitigation Measures 7-23

Figures

Figure 7-1 Habitat Map 7-3

Tables

Table 7-1 Special-Status Plant Species with Potential to Occur in Vicinity 7-6

Table 7-2 Special-Status Wildlife Species with Potential to Occur in Vicinity 7-11

7.0
Biological Resources

This section addresses existing biological resources on the project site; the federal, state, and regional/local regulatory framework pertaining to biological resources; and anticipated impacts to biological resources as a result of the proposed project. This evaluation is based on a reconnaissance field survey conducted by EMC Planning Group biologists; a review of existing scientific literature, aerial photographs, and technical background information; and policies applicable to projects located in the Toro Planning Area of Monterey County.

Information is this section is derived from a variety of sources including:

- *2010 Monterey County General Plan and EIR* (County of Monterey 2010);
- *Toro Area Plan: A Part of the Monterey County General Plan* (County of Monterey 1992);
- California Department of Fish and Wildlife (CDFW) *California Natural Diversity Database* (CDFW 2017);
- California Native Plant Society (CNPS) *Inventory of Rare and Endangered Plants* (CNPS 2017);
- U.S. Fish and Wildlife Service (USFWS) *Endangered Species Program* (USFWS 2017a) and *National Wetlands Inventory* (USFWS 2017b); and
- *Shingu Proposed Senior Housing Project on APN 139-211-035-00, Salinas, CA* (Regan Biological and Horticultural Consulting 2011 and 2013).

7.1 Environmental Setting

EMC Planning Group biologists Andrea Edwards and Jessica Wheeler performed a reconnaissance field survey at the site on February 14, 2017 to document existing plant communities and wildlife habitats, and to evaluate the potential for special-status biological resources to occur on the site. Qualitative estimations of plant cover, structure, and spatial changes in species composition were used to determine plant communities and wildlife habitats, and habitat quality and disturbance level were noted.

Existing Conditions

The site is situated on the Spreckels U.S. Geological Survey (USGS) 7.5-minute quadrangle map, and ranges in elevation from about 60 to 210 feet. The site is within the Central Western

California region, Central Coast sub-region, where coastal vegetation predominates, but chaparral and other non-coastal vegetation also occur (Baldwin 2012). The climate in the area is Mediterranean, with warm and dry summers, and winters tending to be cool and wet. Most of the annual rainfall occurs between the months of December and March.

The site is surrounded by residential development to the east/southeast, open fields used for cattle grazing to the west/southwest, and agricultural fields to the north past River Road. The Salinas River is located northeast of the site, beyond the agricultural fields and residential development. Ornamental (landscaped) vegetation is present through much of the development footprint consisting of many non-native gum trees (*Eucalyptus* sp.) and a few planted Monterey cypresses (*Hesperocyparis macrocarpa*); non-native ornamental shrubs such as prostrate acacia (*Acacia redolens*) are also present near the site entrance/access road.

Most of the site supports non-native grassland dominated by slender wild oat (*Avena barbata*), ripgut grass (*Bromus diandrus*), and barley (*Hordeum murinum*); other prevalent non-native species include field mustard (*Brassica rapa*), tocalote (*Centaurea melitensis*), white sweetclover (*Melilotus alba*), cut-leaved plantain (*Plantago coronopus*), and milk thistle (*Silybum marianum*). Various native wildflowers and other herbaceous plants occur seasonally in the grassland habitat at low densities. Scattered native shrubs are also present in some areas including coyote brush (*Baccharis pilularis*), western poison oak (*Toxicodendron diversilobum*), California sagebrush (*Artemisia californica*), and toyon (*Heteromeles arbutifolia*). Mature native coast live oaks (*Quercus agrifolia*) are present on the hillsides outside the development area. Figure 7-1, Habitat Map, displays existing conditions of the project site.

Bird species observed on the site or expected to utilize the habitat include red-tailed hawk (*Buteo jamaicensis*), American kestrel (*Falco sparverius*), bushtit (*Psaltriparus minimus*), Anna's hummingbird (*Calypte anna*), golden-crowned sparrow (*Zonotrichia atricapilla*), downy woodpecker (*Picoides pubescens*), turkey vulture (*Cathartes aura*), mourning dove (*Zenaida macroura*), and California scrub jay (*Aphelocoma californica*). Mammal species observed on the site or expected to utilize the habitat include California vole (*Microtus californicus*), Botta's pocket gopher (*Thomomys bottae*), striped skunk (*Mephitis mephitis*), California ground squirrel (*Spermophilus beecheyi*), and raccoon (*Procyon lotor*). Reptile species expected in this habitat include western fence lizard (*Sceloporus occidentalis*), terrestrial garter snake (*Thamnophis elegans*), and gopher snake (*Pituophis melanoleucus*).

Special-Status Species

Special-status species in this report are those listed as Endangered, Threatened, or Rare, or as Candidates for listing by the USFWS or CDFW under the state and/or federal Endangered Species Acts. The special-status designation also includes CDFW Species of Special Concern and Fully Protected species, CNPS Rare Plant Rank 1B and 2B species, and other locally rare species that meet the criteria for listing as described in Section 15380 of CEQA Guidelines.

Source: Monterey County GIS 2016, Google Earth 2017

Figure 7-1
Habitat Map

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Special-status species are generally rare, restricted in distribution, declining throughout their range, or have a critical, vulnerable stage in their life cycle that warrants monitoring.

A search of the CDFW *California Natural Diversity Database* was conducted for the Marina, Salinas, Natividad, Seaside, Spreckels, Chualar, Mount Carmel, Carmel Valley, and Rana Creek USGS quadrangles in order to evaluate potentially occurring special-status plant and wildlife species in the project vicinity (CDFW 2017). Records of occurrence for special-status plants were reviewed for those same USGS quadrangles in the CNPS *Inventory of Rare and Endangered Plants* (CNPS 2017). A USFWS *Endangered Species Program* threatened and endangered species list was also generated for Monterey County (USFWS 2017).

Table 7-1, Special-Status Plant Species with Potential to Occur in Vicinity, and Table 7-2, Special-Status Wildlife Species with Potential to Occur in Vicinity, show special-status species documented within the project vicinity, their listing status and suitable habitat description, and their potential to occur on the site. Discussion of special-status species with potential to occur on the site (or otherwise requiring special explanation) follows the tables.

Special-Status Plants

The on-site non-native grassland provides marginally suitable habitat for five special-status plant species; occurrence details including blooming periods for each species are presented in Table 3.7-1. These CNPS Rare Plant Rank 1B species have low potential to occur on the site, and are considered Rare, Threatened, or Endangered in California and elsewhere by the CNPS. The species include Congdon's tarplant (*Centromadia parryi* spp. *congdonii*), fragrant fritillary (*Fritillaria liliacea*), Hickman's onion (*Allium hickmanii*), Hutchinson's larkspur (*Delphinium hutchinsoniae*), and Santa Cruz microseris (*Stebbinsoseris decipiens*). These plants are all herbaceous and therefore typically only observable during their blooming periods. However, these species are not expected to occur because they were not observed during past biological and focused plant surveys conducted on the project site (Regan Biological and Horticultural Consulting 2011, 2013, and 2017).

California Tiger Salamander

California tiger salamander (*Ambystoma californiense*) is a federally and state-listed Threatened species. The project site is not located within federally designated critical habitat for this species. The California tiger salamander is dependent on small shallow bodies of water for breeding. It can be found in grasslands, most frequently within 400 feet of breeding pools or ponds where California ground squirrels (*Spermophilus beecheyi*) are prevalent and active. California tiger salamanders will occupy the burrows of the ground squirrels during summer and fall months, emerging to move toward breeding sites when the rainy season commences. They typically disperse to burrows and other hiding places in oak woodlands and grasslands within a quarter mile or less by early summer.

Table 7-1 Special-Status Plant Species with Potential to Occur in Vicinity

Species	Status (Federal/ State/CNPS)	Suitable Habitat Description	Potential to Occur on Project Site
Alkali milk-vetch *(Astragalus tener* var. *tener)*	--/--/1B.2	Alkaline sites in playas, valley and foothill grassland (on adobe clay), and vernal pools; elevation 1-60m. Blooming period: March – June.	Not expected. No suitable habitat found on the site.
Carmel Valley bush-mallow *(Malacothamnus palmeri* var. *involucratus)*	--/--/1B.2	Chaparral, cismontane woodland, and coastal scrub; elevation 30-1100m. Blooming period: May – October.	Not expected. No suitable habitat found on the site.
Carmel Valley malacothrix *(Malacothrix saxatilis* var. *arachnoidea)*	--/--/1B.2	Rocky sites in chaparral; elevation 25-335m. Blooming period: March – December.	Not expected. No suitable habitat found on the site.
Choris' popcorn-flower *(Plagiobothrys chorisianus* var. *chorisianus)*	--/--/1B.2	Mesic sites in chaparral, coastal scrub, and coastal prairie; elevation 15-100m. Blooming period: March – June.	Not expected. No suitable habitat found on the site.
Congdon's tarplant *(Centromadia parryi* spp. *congdonii)*	--/--/1B.1	Valley and foothill grassland (alkaline); elevation 1-230m. Known to occur on various substrates, and in disturbed and ruderal (weedy) areas. Blooming period: June – November.	Not expected; not observed during focused plant surveys.
Contra Costa goldfields *(Lasthenia conjugens)*	FE/--/1B.1	Wet areas in cismontane woodland, playas (alkaline), valley and foothill grassland, and vernal pools; elevation 0-470m. Blooming period: March – June.	Not expected. No suitable habitat found on the site.
Eastwood's goldenbush *(Ericameria fasciculata)*	--/--/1B.1	Closed-cone coniferous forest, chaparral (maritime), coastal dunes, and coastal scrub/sand. Blooming period: July – October.	Not expected. No suitable habitat found on the site.
Fragrant fritillary *(Fritillaria liliacea)*	--/--/1B.2	Coastal scrub, valley and foothill grassland, and coastal prairie. Often on serpentine substrate; various soils reported though usually clay in grassland; elevation 3-410m. Blooming period: February – April.	Not expected; not observed during focused plant surveys.
Hickman's onion *(Allium hickmanii)*	--/--/1B.2	Closed-cone coniferous forest, chaparral, coastal scrub, valley and foothill grassland, and coastal prairie; prefers sandy loam, damp ground, and vernal swales; elevation 20-200m. Blooming period: April – May.	Not expected; not observed during focused plant surveys.
Hooked popcorn-flower *(Plagiobothrys uncinatus)*	--/--/1B.2	Chaparral (sandy), cismontane woodland, and valley and foothill grassland; prefers sandstone outcrops and canyon sides, often in burned or disturbed areas; elevation 300-730m. Blooming period: April – May.	Not expected. No suitable habitat found on the site.

Species	Status (Federal/ State/CNPS)	Suitable Habitat Description	Potential to Occur on Project Site
Hooker's manzanita *(Arctostaphylos hookeri* ssp. *hookeri)*	--/--/1B.2	Sandy soils in coastal scrub, chaparral, and closed-cone forest habitats; elevation 45-215m. Blooming period: February – April.	Not expected. No suitable habitat found on the site.
Hospital Canyon larkspur *(Delphinium californicum* ssp. *interius)*	--/--/1B.2	Cismontane woodland and chaparral, in wet, boggy meadows, openings in chaparral, and in canyons; elevation 225-1060m. Blooming period: April – June.	Not expected. No suitable habitat found on the site.
Hutchinson's larkspur *(Delphinium hutchinsoniae)*	--/--/1B.2	Broadleaved upland forest, chaparral, coastal prairie, and coastal scrub; elevation 0-400m. Blooming period: March – June.	Not expected; not observed during focused plant surveys.
Jolon clarkia *(Clarkia jolonensis)*	--/--/1B.2	Cismontane woodland, chaparral, and coastal scrub; elevation 20-660m. Blooming period: April – June.	Not expected. No suitable habitat found on the site.
Kellogg's horkelia *(Horkelia cuneata* var. *sericea)*	--/--/1B.1	Closed-cone coniferous forest, maritime chaparral, and coastal scrub, in sandy or gravelly openings; elevation 10-200m. Blooming period: April – September.	Not expected. No suitable habitat found on the site.
Legenere *(Legenere limosa)*	--/--/1B.1	In beds of vernal pools; elevation 1-880m. Blooming period: April – June.	Not expected. No suitable habitat found on the site.
Marsh microseris *(Microseris paludosa)*	--/--/1B.2	Mesic sites in closed-cone coniferous forest, cismontane woodland, coastal scrub, and valley and foothill grassland; elevation 5-300m. Blooming period: April – June.	Not expected. No suitable habitat found on the site.
Menzies's wallflower *(Erysimum menziesii)*	FE/SE/1B.1	Coastal dunes. Known only from Mendocino and Monterey counties, localized on dunes and coastal strand; elevation 0-35m. Blooming period: March – June.	Not expected. No suitable habitat found on the site.
Monterey gilia *(Gilia tenuiflora* ssp. *arenaria)*	FE/ST/1B.2	Sandy openings in maritime chaparral, cismontane woodland, coastal dunes, and coastal scrub; elevation 0-45m. Blooming period: April – June.	Not expected. No suitable habitat found on the site.
Monterey pine *(Pinus radiata)*	--/--/1B.1	Closed-cone coniferous forest and cismontane woodland; elevation 25-185m. Evergreen.	Not expected. No suitable habitat found on the site. A few ornamental pines have been planted on the site.
Monterey spineflower *(Chorizanthe pungens* var. *pungens)*	FT/--/1B.2	Sandy openings in maritime chaparral, cismontane woodland, coastal dunes, coastal scrub, and valley and foothill grassland; elevation 3-450m. Blooming period: April – June.	Not expected. No suitable habitat found on the site.
Northern curly-leaved monardella *(Monardella sinuata* ssp. *nigrescens)*	--/--/1B.2	Sandy soils in coastal dunes, coastal scrub, chaparral, and lower montane coniferous forest; elevation 0-300m. Blooming period: April – September.	Not expected. No suitable habitat found on the site.

Species	Status (Federal/ State/CNPS)	Suitable Habitat Description	Potential to Occur on Project Site
Oregon meconella *(Meconella oregana)*	--/--/1B.1	Open, moist places in coastal prairie and coastal scrub; elevation 250-500m. Blooming period: March – April.	Not expected. No suitable habitat found on the site.
Pacific Grove clover *(Trifolium polyodon)*	--/SR/1B.1	Mesic sites in closed-cone coniferous forest, coastal prairie, meadows and seeps, and valley and foothill grassland; elevation 5-120m. Blooming period: April – June.	Not expected. No suitable habitat found on the site.
Pajaro manzanita *(Arctostaphylos pajaroensis)*	--/--/1B.1	Sandy soils in chaparral; elevation 30-760m. Blooming period: December – March.	Not expected. No suitable habitat found on the site; this perennial shrub not observed.
Pine rose *(Rosa pinetorum)*	--/--/1B.2	Closed-cone coniferous forest; elevation 2-300m. Blooming period: May – July.	Not expected. No suitable habitat found on the site.
Pink Johnny-nip *(Castilleja ambigua* var. *insalutata*)	--/--/1B.1	Coastal bluff scrub and coastal prairie; elevation 0-100m. Blooming period: May – August.	Not expected. No suitable habitat found on the site.
Pinnacles buckwheat *(Eriogonum nortonii)*	--/--/1B.3	Chaparral, and valley and foothill grassland; sandy sites; often on recent burns; elevation 300-975m. Blooming period: May – June.	Not expected. No suitable habitat found on the site.
Point Reyes horkelia *(Horkelia marinensis)*	--/--/1B.2	Sandy sites in coastal dunes, coastal prairie, and coastal scrub; elevation 5-755m. Blooming period: May – September.	Not expected. No suitable habitat found on the site.
Robust spineflower *(Chorizanthe robusta* var. *robusta)*	FE/--/1B.1	Sandy or gravelly openings in cismontane woodland, coastal dunes, and coastal scrub; prefers sandy terraces and bluffs or loose sand; elevation 3-300m. Blooming period: April – July.	Not expected. No suitable habitat found on the site.
Round-leaved filaree *(California macrophylla)*	--/--/1B.2	Clay sites in cismontane woodland, and valley and foothill grassland; elevation 15-1200m. Blooming period: March – May.	Not expected. No suitable habitat found on the site.
Sand-loving wallflower *(Erysimum ammophilum)*	--/--/1B.2	Sandy openings in maritime chaparral, coastal dunes, and coastal scrub; elevation 0 – 60m. Blooming period: February – June.	Not expected. No suitable habitat found on the site.
Sandmat manzanita *(Arctostaphylos pumila)*	--/--/1B.2	Sandy openings in closed-cone coniferous forest, maritime chaparral, cismontane woodland, coastal dunes, and coastal scrub; elevation 30-730m. Blooming period: February – May.	Not expected. No suitable habitat found on the site; this perennial shrub not observed.
Santa Cruz clover *(Trifolium buckwestiorum)*	--/--/1B.1	Mesic sites in broadleaved upland forest, cismontane woodland, and coastal prairie; prefers moist grassland and gravelly margins; elevation 105-610m. Blooming period: April – October.	Not expected. No suitable habitat found on the site.

Species	Status (Federal/ State/CNPS)	Suitable Habitat Description	Potential to Occur on Project Site
Santa Cruz microseris *(Stebbinsoseris decipiens)*	--/--/1B.2	Open areas in broadleaved upland forest, closed-cone coniferous forest, chaparral, coastal prairie, coastal scrub, and valley and foothill grassland; sometimes on serpentine substrates; elevation 10-500m. Blooming period: April – May.	Not expected; not observed during focused plant surveys.
Santa Lucia bedstraw *(Galium clementis)*	--/--/1B.3	Montane coniferous forest. Forms soft mats in shady rocky patches, on granite or serpentine, mostly on exposed peaks; elevation 1130-1780m. Blooming period: May – July.	Not expected. No suitable habitat found on the site.
Santa Lucia bush-mallow *(Malacothamnus palmeri* var. *palmeri)*	--/--/1B.2	Chaparral. Prefers dry rocky slopes, mostly near summits, but occasionally extends down canyons to the sea; elevation 60-365m. Blooming period: May – July.	Not expected. No suitable habitat found on the site.
Seaside bird's-beak *(Cordylanthus rigidus* ssp. *littoralis)*	--/SE/1B.1	Sandy often disturbed sites in closed-cone coniferous forest, maritime chaparral, cismontane woodland, coastal dunes, and coastal scrub; elevation 0-215m. Blooming period: May – October.	Not expected. No suitable habitat found on the site.
Tidestrom's lupine *(Lupinus tidestromii)*	FE/SE/1B.1	Partially stabilized dunes, immediately near the ocean; elevation 0-3m. Blooming period: April – June.	Not expected. No suitable habitat found on the site.
Toro manzanita *(Arctostaphylos montereyensis)*	--/--/1B.2	Sandy areas in maritime chaparral, cismontane woodland, and coastal scrub; elevation 30-730m. Blooming period: February – March.	Not expected. No suitable habitat found on the site; this perennial shrub not observed.
Umbrella larkspur *(Delphinium umbraculorum)*	--/--/1B.3	Mesic sites in cismontane woodland; elevation 400-1600m. Blooming period: April – June.	Not expected. No suitable habitat found on the site.
Vernal pool bent grass *(Agrostis lacuna-vernalis)*	--/--/1B.1	Vernal pools (mima mounds); elevation 115-145m.	Not expected. No suitable habitat found on the site.
Yadon's rein orchid *(Piperia yadonii)*	FE/--/1B.1	Sandy sites in coastal bluff scrub, closed-cone coniferous forest, and maritime chaparral; elevation 10-510m. Blooming period: May – August.	Not expected. No suitable habitat found on the site.

Sources: CDFW 2017, CNPS 2017, USFWS 2017, EMC Planning Group 2017

Listing Status Codes:

Federal (USFWS)

FE - Listed as Endangered under the Federal Endangered Species Act.

FT - Listed as Threatened under the Federal Endangered Species Act.

FC - Candidate for listing under the Federal Endangered Species Act.

State (CDFW)

SE - Listed as Endangered under the California Endangered Species Act.

ST - Listed as Threatened under the California Endangered Species Act.

SR - Listed as Rare under the California Endangered Species Act.

SC - Candidate for listing under the California Endangered Species Act.

CNPS Rare Plant Ranks and Threat Code Extensions

1B: Plants that are considered Rare, Threatened, or Endangered in California and elsewhere.

2B: Plants that are considered Rare, Threatened, or Endangered in California, but more common elsewhere.

.1: Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat).

.2: Fairly endangered in California (20-80% occurrences threatened).

.3: Not very threatened in California (less than 20% of occurrences threatened low degree and immediacy of threat or no current threats known).

Table 7-2 Special-Status Wildlife Species with Potential to Occur in Vicinity

Species	Status (Federal/State)	Suitable Habitat Description	Potential to Occur on Project Site
American badger *(Taxidea taxus)*	--/SSC	Most abundant in drier, open stages of shrub, forest, and herbaceous habitats. Needs sufficient food and open, uncultivated ground with friable soils to dig burrows. Preys on burrowing rodents.	Low potential to occur. Marginally suitable habitat found on the site.
Bank swallow *(Riparia riparia)*	--/ST	Highly colonial species that nests in alluvial soils along rivers, streams, lakes, and ocean coasts. Nesting colonies only occur in vertical banks or bluffs of friable soils at least one meter tall, suitable for burrowing with some predator deterrence values.	Not expected. No suitable habitat found on the site.
Bay checkerspot butterfly *(Euphydryas editha bayensis)*	FT/--	Restricted to native grasslands on outcrops of serpentine soil in the vicinity of San Francisco Bay. *Plantago erecta* is the primary host plant; *Castilleja densiflora* and *C. exserta* are secondary host plants.	Not expected. No suitable habitat found on the site.
Black legless lizard *(Anniella pulchra nigra)*	--/SSC	Moist, warm habitats with loose soil for burrowing and prostrate plant cover in beaches, chaparral, pine-oak woodland, or riparian areas.	Not expected. No suitable habitat found on the site.
Burrowing owl *(Athene cunicularia)*	--/SSC	Open, dry, annual or perennial grasslands, desert, or scrubland, with available small mammal burrows.	Low potential to occur. Marginally suitable habitat found on the site.
California red-legged frog *(Rana draytonii)*	FT/SSC	Rivers, creeks, and stock ponds with pools and overhanging vegetation. Requires dense, shrubby or emergent riparian vegetation, and prefers short riffles and pools with slow-moving, well-oxygenated water. Needs upland habitat to aestivate (remain dormant during dry months) in small mammal burrows, cracks in the soil, or moist leaf litter.	Not expected. No suitable habitat found on the site.
California tiger salamander *(Ambystoma californiense)*	FT/ST	Grasslands and oak woodlands near seasonal pools and stock ponds in central and coastal California. Needs upland habitat to aestivate (remain dormant during dry months) in small mammal burrows, cracks in the soil, or moist leaf litter. Requires seasonal water sources that persist into late March for breeding.	Not expected. No suitable habitat found on the site.

Species	Status (Federal/State)	Suitable Habitat Description	Potential to Occur on Project Site
Coast horned lizard *(Phrynosoma blainvillii)*	--/SSC	Arid grassland and scrubland habitats; prefers lowlands along sandy washes with scattered low bushes. Requires open areas for sunning, bushes for cover, patches of loose soil for burrowing, and abundant supply of ants and other insects for feeding.	Not expected. No suitable habitat found on the site.
Coast Range newt *(Taricha torosa)*	--/SSC	Coastal drainages; lives in terrestrial habitats and can migrate over one km to breed in ponds, reservoirs, and slow-moving streams.	Not expected. No suitable habitat found on the site.
Foothill yellow-legged frog *(Rana boylii)*	--/SSC	Partly shaded, shallow streams and riffles with rocky substrate in a variety of habitats. Requires at least some cobble-sized substrate for egg-laying and 15 weeks of available water to attain metamorphosis.	Not expected. No suitable habitat found on the site.
Monterey dusky-footed woodrat *(Neotoma macrotis luciana)*	--/SSC	Forest habitats of moderate canopy and moderate to dense understory. Also chaparral habitats. Nests constructed of grass, leaves, sticks, feathers, etc. Population may be limited by availability of nest materials.	Moderate potential to occur. Three potential nest sites identified during the survey.
Silvery legless lizard *(Anniella pulchra pulchra)*	--/SSC	Sandy or loose loamy soils under sparse vegetation; moist soils.	Not expected. No suitable habitat found on the site.
Smith's blue butterfly *(Euphilotes enoptes smithi)*	FE/--	Coastal dunes and coastal sage scrub. Host plants include *Eriogonum latifolium* and *E. parvifolium* for larval and adult stages.	Not expected. No suitable habitat found on the site.
Steelhead *(Oncorhynchus mykiss irideus)*	FT/--	Coastal streams with clean spawning gravel. Requires cool water and pools. Needs migratory access between natal stream and ocean. USFWS-designated critical habitat for this species is present northeast of the site along the Salinas River.	Not expected. No suitable habitat found on the site.
Swainson's hawk *(Buteo swainsoni)*	--/ST	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas, such as grasslands or agricultural fields supporting rodent populations.	Not expected. No suitable habitat found on the site. Outside of known range for species.
Tidewater goby *(Eucyclogobius newberryi)*	FE/SSC	Brackish water habitats; found in shallow lagoons and lower stream reaches in still but not stagnant water with high oxygen levels.	Not expected. No suitable habitat found on the site.

Species	Status (Federal/State)	Suitable Habitat Description	Potential to Occur on Project Site
Townsend's big-eared bat *(Corynorhinus townsendii)*	--/SSC	Inhabits a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	Not expected. No suitable habitat found on the site.
Tricolored blackbird *(Agelaius tricolor)*	--/SC&SSC	Areas adjacent to open water with protected nesting substrate, which typically consists of dense, emergent freshwater marsh vegetation.	Not expected. No suitable habitat found on the site.
Two-striped garter snake *(Thamnophis hammondii)*	--/SSC	Coastal California up to 7,000 feet in elevation. Highly aquatic, found in or near permanent fresh water, often along streams with rocky beds and riparian vegetation.	Not expected. No suitable habitat found on the site.
Western pond turtle *(Emys marmorata)*	--/SSC	Ponds, marshes, rivers, streams, and irrigation ditches with aquatic vegetation. Needs basking sites (such as rocks or partially submerged logs), and suitable upland habitat (sandy banks or grassy open fields) for egg-laying.	Not expected. No suitable habitat found on the site.
Western red bat *(Lasiurus blossevillii)*	--/SSC	Roosts primarily in trees, 2-40 feet above the ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees and open areas for foraging.	Low potential to occur. Marginally suitable roosting habitat found on the site. Known to occur in the project vicinity.
Western snowy plover *(Charadrius alexandrinus nivosus)*	FT/SSC	Sandy beaches, salt pond levees, shores of large alkali lakes; needs sandy, gravelly, or friable soils for nesting.	Not expected. No suitable habitat found on the site.

Sources: CDFW 2017, USFWS 2017, EMC Planning Group 2017

Listing Status Codes:

Federal (USFWS)

FE - Listed as Endangered under the Federal Endangered Species Act.

FT - Listed as Threatened under the Federal Endangered Species Act.

FC - Candidate for listing under the Federal Endangered Species Act.

State (CDFW)

SE - Listed as Endangered under the California Endangered Species Act.

ST - Listed as Threatened under the California Endangered Species Act.

SC - Candidate for listing under the California Endangered Species Act.

SFP - CDFW Fully Protected species under California Fish and Game Code.

SSC - CDFW Species of Special Concern.

The project site does not contain habitat suitable for California tiger salamander breeding. CDFW records indicate that there are no known occurrences of California tiger salamander within 2.5 miles of the site. There are no ponds or wetted areas on the site. The ditch that runs along the eastern edge of the property is outside the project boundary and did not support standing water at the time of the survey, even after extremely heavy rains this season (winter 2015-2016). The ditch also appears to be sprayed with herbicides, as vegetation observed in this area was yellow, in contrast to surrounding vegetation. There were very few California ground squirrel burrows observed in the grassland areas, and California tiger salamander is not expected to utilize the site for upland refuge habitat.

California Red-Legged Frog

California red-legged frog (*Rana draytonii*) is federally listed as Threatened and is a California Species of Special Concern. The project site is not located within federally designated critical habitat for this species. California red-legged frog is California's largest native frog, and is generally restricted to riparian and lacustrine (lake) habitats. This species prefers deep, still pools, usually greater than two feet in depth, in creeks, rivers or lakes below 5,000 feet in elevation. Breeding habitats require freshwater emergent vegetation or thick riparian vegetation, especially willow thickets adjacent to shorelines. California red-legged frogs can survive in seasonal bodies of water that dry up for short periods if a permanent water body or dense vegetation is nearby. They can move considerable distances overland, with dispersal occurring predominantly within creek drainages. Individuals are often found during the summer in foraging habitat not suitable for breeding, and therefore are presumed to move seasonally between summer foraging and winter breeding habitats.

The project site does not contain habitat suitable for California red-legged frog breeding. CDFW records indicate that there are no known occurrences of California red-legged frog within 2.5 miles of the site. As described above, there are no ponds or wetted areas on the site. There are very few California ground squirrel burrows observed in the grassland areas, and California red-legged frog is not expected to utilize the site for upland refuge habitat.

American Badger

American badger (*Taxidea taxus*) is a California Species of Special Concern. It is an uncommon, permanent resident found throughout most of the state, except in the northern North Coast area. Typical habitats include drier open stages of most shrub, forest, and herbaceous habitats with friable soils suitable for burrows. Prey species include fossorial rodents such as rats, mice, chipmunks, ground squirrels, and pocket gophers. Badger diet shifts seasonally depending on the availability of prey and may also include reptiles, insects, earthworms, eggs, birds, and carrion. American badger was recorded in 1992 approximately two miles from the project site. Badgers have been well documented in this part of Monterey

County from the former Fort Ord, Toro Park, and many cattle ranches in the Sierra de Salinas and Santa Lucia range valleys. The project site, however, contains marginally suitable habitat and prey for this species.

Burrowing Owl

Burrowing owl (*Athene cunicularia*) is a California Species of Special Concern. Burrowing owls live and breed in burrows in the ground, especially in abandoned California ground squirrel burrows. Optimal habitat conditions include large open, dry and nearly level grasslands or prairies with short to moderate vegetation height and cover, areas of bare ground, and populations of burrowing mammals. This species is known to occur about four miles northeast of the site on the Salinas Municipal Airport property. The project site's non-native grassland provides marginally suitable foraging habitat for burrowing owl, and a few scattered small mammal burrows on the site could be utilized for nesting habitat. Burrowing owl has low potential to occur on the site.

Monterey Dusky-Footed Woodrat

Monterey dusky-footed woodrat (*Neotoma fuscipes luciana*) is a California Species of Special Concern and is typically found within dense chaparral or oak woodland habitats with moderately dense understory growth and abundant dead wood available for midden construction. A midden is a small pile or "house" made of sticks, leaves, bones, seeds, etc. gathered by a rodent. Three possible midden locations were identified on the project site during the survey. Two Monterey cypress trees had entrance burrows and grass caches, and one gum tree had a potential stick midden (lacking a visible entrance/fresh scat, though there did appear to be freshly chewed sticks present).

Western Red Bat

Mature trees on the site provide potential roosting habitat for foliage-roosting bats, including the California Species of Special Concern western red bat (*Lasiurus blossevillii*). This species is known to occur in the project region.

Nesting Raptors and Migratory Birds

Many bird species are migratory and fall under the jurisdiction of the Migratory Bird Treaty Act, protections for birds of prey, and/or are considered Fully Protected Species (discussed further in the Regulatory Setting section below). Several avian species were observed at the project site during the reconnaissance field survey, including turkey vulture, red-tailed hawk, American kestrel, golden-crowned sparrow, and downy woodpecker. Additional species may forage at the site, including Cooper's hawk (*Accipiter cooperii*) and golden eagle (*Aquila chrysaetos*). Although no nesting activity was observed during the surveys, there are trees and shrubs present on the project site that could provide suitable nesting habitat for a variety of species, including hawks, owls, and songbirds.

Wildlife Movement

Wildlife movement includes migration (i.e., usually movement one way per season), inter-population movement (i.e., long-term dispersal and genetic flow), and small travel pathways (i.e., daily movement within an animal's territory). While small travel pathways usually facilitate movement for daily home range activities, such as foraging or escape from predators, they also provide connection between outlying populations and the main populations, permitting an increase in gene flow among populations. These habitat linkages can extend for miles and occur on a large scale throughout the greater region. Habitat linkages facilitate movement between populations located in discrete locales and populations located within larger habitat areas.

River Road and intensive agricultural row crop production to the north of the site and dense residential development to the south and east of the site likely restricts wildlife movement through the project site. Common mammals such as black-tailed deer (*Odocoileus hemionus columbianus*), black-tailed jackrabbit (*Lepus californicus*), and raccoon may utilize the on-site non-native grasslands for limited wildlife movement. The few oak trees on the property's hillside likely allow more wildlife movement opportunities due to the presence of cover and possible foraging opportunities. However, the hillside area where the few oak trees are located is not proposed for development.

7.2 REGULATORY SETTING

Federal Plans and Regulations

Endangered Species Act

The federal Endangered Species Act of 1973 (known hereafter as the "Act") protects species that the USFWS has listed as "Endangered" or "Threatened." Permits may be required from USFWS if activities associated with a proposed project would result in the "take" of a federally listed species or its habitat. Under the Act, the definition of "take" is to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." USFWS has also interpreted the definition of "harm" to include significant habitat modification that could result in "take." "Take" of a listed species is prohibited unless (1) a Section 10(a) permit has been issued by the USFWS or (2) an Incidental Take Statement has been obtained through formal consultation between a federal agency and the USFWS pursuant to Section 7 of the Act.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act of 1989 prohibits killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior. This Act encompasses whole birds, parts of birds, bird nests, and eggs of over 800 native birds, including many common species.

Clean Water Act

Section 404 of the Clean Water Act of 1972 regulates the discharge of dredge and fill material into "Waters of the U.S." including wetlands. Certain natural drainage channels and wetlands are considered jurisdictional "Waters of the U.S." The U.S. Army Corps of Engineers (USACE) is responsible for administering the Section 404 permit program. The agency determines the extent of its jurisdiction as defined by ordinary high water marks on channel banks. Wetlands are habitats with soils that are intermittently or permanently saturated, or inundated. The resulting anaerobic conditions naturally select for plant species known as hydrophytes that show a high degree of fidelity to such soils. Wetlands are identified by the presence of hydrophytic vegetation, hydric soils (soils intermittently or permanently saturated by water), and wetland hydrology according to methodologies outlined in the 1987 *Corps of Engineers Wetlands Delineation Manual* and the 2006 *Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region*.

Activities that involve the discharge of fill into jurisdictional waters are subject to the permit requirements of the USACE. Discharge permits are typically issued on the condition that the project proponent agrees to provide compensatory mitigation which results in no net loss of wetland area, function, or value, either through wetland creation, restoration, or the purchase of wetland credits through an approved wetland mitigation bank. In addition to individual project discharge permits, the USACE also issues general nationwide permits applicable for certain activities.

State Plans and Regulations

California Endangered Species Act

Pursuant to the California Endangered Species Act and Section 2081 of the California Fish and Game Code, an Incidental Take Permit from the CDFW is required for projects that could result in the "take" of a state-listed Threatened or Endangered species. "Take" is defined under these laws as an activity that would directly or indirectly kill an individual of a species. If a project would result in the "take" of a state-listed species, then a CDFW Incidental Take Permit, including the preparation of a conservation plan, would be required.

Nesting Birds and Birds of Prey

Sections 3505, 3503.5, and 3800 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, including their nests or eggs. Birds of prey (the orders Falconiformes and Strigiformes) are specifically protected in California under provisions of the California Fish and Game Code, Section 3503.5. This section of the Code establishes that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this Code. Disturbance that causes nest abandonment and/or loss of reproductive effort, such as construction during the breeding season, is considered take by the CDFW.

Streambed Alterations

The CDFW has jurisdiction over the bed and bank of natural drainages according to provisions of Sections 1601 through 1603 of the California Fish and Game Code. Diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that support wildlife resources and/or riparian vegetation are subject to CDFW regulations. Activities that would disturb these drainages are regulated by the CDFW; authorization is required in the form of a Streambed Alteration Agreement. Such an agreement typically stipulates measures that will protect the habitat values of the drainage in question.

California Porter-Cologne Water Quality Control Act

Under the California Porter-Cologne Water Quality Control Act, the applicable Regional Water Quality Control Board (RWQCB) may necessitate Waste Discharge Requirements for the fill or alteration of "Waters of the State," which according to California Water Code Section 13050 includes "any surface water or groundwater, including saline waters, within the boundaries of the state." The RWQCB may, therefore, necessitate Waste Discharge Requirements even if the affected waters are not under USACE jurisdiction.

Also, under Section 401 of the Clean Water Act, any activity requiring a USACE Section 404 permit must also obtain a state Water Quality Certification (or waiver thereof) to ensure that the proposed activity will meet state water quality standards. The applicable state RWQCB is responsible for administering the water quality certification program and enforcing National Pollutant Discharge Elimination System (NPDES) permits.

Local Plans and Regulations

County of Monterey General Plan

The *2010 Monterey County General Plan* - Conservation and Open Space (OS) element contains the following goal and policies associated with biological resources that are applicable to the proposed project:

> Goal OS-5: Conserve listed species, critical habitat, habitat and species protected in area plans; avoid, minimize and mitigate significant impacts to biological resources.
>
> Policy OS-5.4: Development shall avoid, minimize, and mitigate impacts to listed species and critical habitat to the extent feasible. Measures may include but are not limited to: clustering lots for development to avoid critical habitat areas, dedications of permanent conservation easements; or, other appropriate means. If development may affect listed species, consultation with United States Fish and Wildlife Service (CDFG) may be required and impacts may be mitigated by expanding the resource

> elsewhere on-site or within close proximity off-site. Final mitigation requirements would be determined as required by law.Policy OS-5.16: A biological study shall be required for any development project requiring a discretionary permit and having the potential to 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, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species…
>
> Policy OS-5.25: Occupied nests of statutorily protected migratory birds and raptors shall not be disturbed during the breeding season (generally February 1 to September 15) The county shall consult, or require the developer to consult, with a qualified biologist prior to any site preparation or construction work in order to: determine whether work is proposed during nesting season for migratory birds or raptors, determine whether site vegetation is suitable to nesting migratory birds or raptors, identify any regulatory requirements for setbacks or other avoidance measures for migratory birds and raptors which could nest on the site, and establish project-specific requirements for setbacks, lock-out periods, or other methods of avoidance of disruption of nesting birds.…

County of Monterey Toro Area Plan

The *Toro Area Plan* is part of the Monterey County General Plan. It contains the following supplemental policy regarding protection of biological resources:

> T-3.7 Removal of healthy, native oak trees in the Toro Planning Area shall be discouraged. An ordinance shall be developed to identify required procedures for removal of these trees. Said ordinance shall take into account fuel modification needed for fire prevention in the vicinity of structures and shall include:
>
> a. Permit requirements.
>
> b. Replacement criteria
>
> c. Exceptions for emergencies and governmental agencies

Monterey County Zoning Ordinance, Title 21

The *Monterey County Zoning Ordinance: Title 21*, Section 21.64.260 – Preservation of Oak and Other Protected Trees, states that "no oak or madrone tree six inches or more in diameter two feet above ground level shall be removed in the …Toro Area Plan areas" without a County-approved permit.

Las Palmas Ranch Specific Plan

3. All structure, including residential, including residential, commercial, recreational and accessory buildings; fences; walls; decks and signs shall require design approval. Approval shall be based upon conformity with the policies of this plan as well as the following specific criteria:

A. Compatibility of external design, materials and colors with existing ground elevations and natural land forms.

B. Conformity of design and location of structures with respect to existing ground elevations and natural land forms.

C. Mitigation of visual impacts from within the development and from major designated view corridors outside of the project.

D. Protection of significant trees and vegetation. Trees over 36" in circumference (four feet above the ground) shall be retained. Where it is necessary to remove such trees for better design or layout, then they shall be replaced on a two for one basis subject to the approval of the Director of Planning.

E. Prevention of erosion, sedimentation and visual impacts resulting from grading, excavation, cutting or filling.

7.3 THRESHOLDS OR STANDARDS OF SIGNIFICANCE

The CEQA Guidelines (Appendix G) indicates that a project may have a significant effect on the environment if it would have any of the effects listed below.

- 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, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- 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 U.S. Fish and Wildlife Service;
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- 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;

- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan.

The project site does not contain sensitive natural communities or riparian habitat. Though a shallow man-made drainage ditch exists along the eastern edge of the site adjacent to residences, it is not located within the development area, and no wetlands or waterways potentially under regulatory agency jurisdiction would be impacted by the proposed project. Though the project site contains County-regulated oak trees, they are not located within the development area. No habitat conservation plans apply to the project area. No further discussion of these topics is required. The applicable issues for the proposed project (special-status species and wildlife movement) are evaluated in the impact analysis below.

7.4 Environmental Impact Analysis

Special-Status Species

American Badger, Burrowing Owl, Monterey Dusky-Footed Woodrat, and Western Red Bat

Impacts to special-status wildlife species would be a significant adverse environmental impact. If American badger, burrowing owl, Monterey dusky-footed woodrat, and western red bat are present on the project site, construction activities could result in the loss or disruption of individual animals.

Nesting Raptors and Migratory Birds

If nesting birds protected by state and federal regulations are present on or adjacent to the site during site preparation or construction activities, the proposed project may directly result in loss of active nests, or indirectly result in nest abandonment and thereby cause loss of fertile eggs or nestlings. This would be a significant adverse environmental impact. Protected nesting birds, including protected raptor species, have the potential to nest on and adjacent to the project site. Construction activities including vegetation removal and site preparation have potential to impact nesting birds (including raptors) protected under the federal Migratory Bird Treaty Act and California Fish and Game Code if such activities occur during the nesting bird season (February 1 through September 15).

Wildlife Movement

The proposed project would impede to a limited degree the local movement of common wildlife due to habitat loss. However, the site does not function as a regional wildlife

movement corridor or habitat linkage. This is a less than significant adverse environmental impact.

Tree Removal

The proposed project does not include the removal of trees protected by the Monterey County Municipal Code, Chapter 16.60 – Preservation of Oak Trees and Other Protected Trees within the Toro Plan area. Eucalyptus trees proposed for removal on the project site are not native and therefore, are not protected by the county.

7.5 IMPACT SUMMARY AND MITIGATION MEASURES

Anticipated project impacts to special-status biological resources are presented below, along with applicable measures designed to avoid, minimize, and/or mitigate significant impacts.

IMPACT Potential Loss or Disturbance of American Badger (Less than Significant with Mitigation)

If American badger is present on the project site, construction activities could result in the loss or disturbance of individual animals. This would be a significant adverse environmental impact. Implementation of the following mitigation measure would reduce the potential impact to a less-than-significant level.

Mitigation Measure

BIO-1 Prior to the start of construction activities, a qualified Monterey County-approved consulting biologist shall conduct pre-construction surveys of the grassland habitat on the site to identify any potential American badger burrows/dens. These surveys shall be conducted no more than 15 days prior to the start of construction. If a potential American badger burrow/den is found during the surveys, coordination with the CDFW shall be undertaken in order to develop a suitable strategy to avoid impacts to American badger.

After CDFW approval, impacts to active American badger dens shall be avoided by establishing exclusion zones around all active badger dens, within which construction related activities shall be prohibited until denning activities are complete or the den is abandoned. A qualified biologist shall monitor each den once per week in order to track the status of the den and to determine when a den area has been cleared for construction.

The project proponent shall be responsible for the implementation of this mitigation measure, subject to monitoring by the Monterey County Resource Management Agency.

Implementation of this mitigation measure would eliminate the potential impact by requiring pre-construction surveys for American badger burrows/dens, and avoidance of any active dens if present in the development footprint.

IMPACT Potential Loss or Disturbance of Burrowing Owl (Less than Significant with Mitigation)

If burrowing owl is present on or adjacent to the project site, construction activities could result in the loss or disturbance of individual animals. This would be a significant adverse environmental impact. Implementation of the following mitigation measure would reduce the potential impact to a less-than-significant level.

Mitigation Measure

BIO-2 To avoid/minimize impacts to burrowing owls potentially occurring on or adjacent to the project site, the project proponent shall retain a qualified Monterey County-approved consulting biologist to conduct a two-visit (i.e. morning and evening) presence/absence survey at areas of suitable habitat on and adjacent to the project site no less than 14 days prior to the start of construction or ground disturbance activities. Surveys shall be conducted according to methods described in the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). If these pre-construction "take avoidance" surveys performed during the breeding season (February through August) or the non-breeding season (September through January) locate occupied burrows in or near construction areas, consultation with the CDFW shall occur to interpret survey results and develop a project-specific avoidance and minimization approach.

The project proponent shall be responsible for the implementation of this mitigation measure, subject to monitoring by the Monterey County Resource Management Agency.

Implementation of this mitigation measure would reduce the potential impact by requiring pre-construction surveys for burrowing owl, and consultation with the CDFW to protect individual burrowing owls if they are present on or adjacent to the project site.

IMPACT Potential Loss or Disturbance of Monterey Dusky-Footed Woodrat (Less than Significant with Mitigation)

Three possible woodrat midden locations were identified at the project site during the reconnaissance field survey. Loss or disturbance of woodrats due to midden removal during construction activities would be a significant adverse environmental impact. Implementation of the following mitigation measure would reduce the potential impact to a less-than-significant level.

Mitigation Measure

BIO-3 A qualified Monterey County-approved consulting biologist shall conduct pre-construction surveys for woodrat nests within the development footprint. These surveys shall be conducted no more than 15 days prior to the start of construction. All woodrat middens shall be flagged for avoidance of direct construction impacts where feasible. If impacts cannot be avoided, woodrat middens shall be dismantled no more than three days prior to construction activities starting at each midden location. All vegetation and duff materials shall be removed from three feet around the midden prior to dismantling so that the occupants do not attempt to rebuild. Middens are to be slowly dismantled by hand in order to allow the occupants to disperse.

The project proponent shall be responsible for the implementation of this mitigation measure, subject to monitoring by the Monterey County Resource Management Agency.

Implementation of this mitigation measure would reduce the potential impact by requiring pre-construction surveys for Monterey dusky-footed woodrat middens, and avoidance or dismantling of any middens within the development footprint.

IMPACT Potential Loss or Disturbance of Special-Status Western Red Bat (Less than Significant with Mitigation)

Potential habitat for western red bat occurs in tree foliage within the project site. If special-status bats are present on the site, tree removal and other construction activities could result in the loss of individual animals. This would be a significant adverse environmental impact. Implementation of the following mitigation measure would reduce the potential impact to a less-than-significant level.

Mitigation Measure

BIO-4 Prior to tree removal activities, the project proponent shall retain a qualified Monterey County-approved consulting biologist to conduct a focused survey for bats and potential roosting sites in trees to be removed and trees within 250 feet of the development footprint. These surveys shall be conducted no more than 15 days prior to the start of construction. The surveys can be conducted by visual identification and 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.

If no roosting sites or bats are found, a letter report confirming absence shall be sent to the Monterey County Resource Management Agency and no further mitigation is required.

If bats or roosting sites are found, a letter report and supplemental documents shall be provided to the Monterey County Resource Management Agency prior to grading permit issuance and the following monitoring, exclusion, and habitat replacement measures shall be implemented:

a. If bats are found roosting outside of the nursery season (which is May 1 through October 1), they shall be evicted as described under (b) below. 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. If the roost is determined to not be a maternal roost, then the bats shall be evicted as described under (b) below. 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 250-foot buffer zone (or different size if determined in consultation with the CDFW) shall be established around the roosting site within which no construction activities including tree removal shall occur until after the nursery season.

b. If a non-breeding bat hibernaculum is found in a tree or snag scheduled for removal, the individuals will be safely evicted, under the direction of a qualified bat biologist and in consultation with the CDFW. Methods could include carefully opening the roosting area by hand to expose the cavity. Removal of the tree or snag shall be conducted no earlier than the following day (i.e., at least one night will be provided between initial disturbance and the tree removal). This action will allow bats to leave during dark hours, which increases their chance of finding new roosts with a minimum of potential predation.

The project proponent shall be responsible for the implementation of this mitigation measure, subject to monitoring by the Monterey County Resource Management Agency.

Implementation of this mitigation measure would reduce the potential impact by requiring pre-construction surveys prior to tree removal activities with avoidance of any bat maternity

roosts or eviction of non-breeding bats if present on or adjacent to the development footprint.

IMPACT Potential Loss or Disturbance of Protected Nesting Birds (Less than Significant with Mitigation)

Protected nesting birds, including raptor species, have potential to nest on and adjacent to the project site during the nesting bird season (February 1 through September 15). If nesting birds protected by state and federal regulations are present on or adjacent to the site during construction activities including vegetation removal and site preparation, the proposed project may directly result in loss of active nests, or indirectly result in nest abandonment and thereby cause loss of fertile eggs or nestlings. This would be a significant adverse environmental impact. Implementation of the following mitigation measure would reduce the potential impact to a less-than significant level.

Mitigation Measure

BIO-5 To avoid possible impacts to nesting birds on and adjacent to the project site, if noise generation, ground disturbance, vegetation and tree removal, including removal of non-native trees, or other construction activities begin during the nesting bird season (February 1 to September 15), or if construction activities are suspended for at least two weeks and recommence during the nesting bird season, then the project proponent shall retain a qualified Monterey County-approved consulting biologist to conduct a pre-construction survey for nesting birds. The survey shall be performed within suitable nesting habitat areas on and adjacent to the site to ensure that no active nests would be disturbed during project implementation. This survey shall be conducted no more than one week prior to the initiation of disturbance or construction activities.

If no active bird nests are detected during the survey, then project activities can proceed as scheduled. However, if an active bird nest of a native species is detected during the survey, then a plan for bird nest avoidance shall be prepared by the qualified biologist to determine and clearly delineate an appropriately sized, temporary protective buffer area around each active nest, depending on the nesting bird species, existing site conditions, and type of proposed disturbance or construction activities. The protective buffer area around an active bird nest is typically 75-250 feet, determined at the discretion of the qualified biologist.

To ensure that no inadvertent impacts to an active bird nest will occur, no disturbance and/or construction activities shall occur within the protective buffer area(s) until the juvenile birds have fledged (left the nest), and there is no evidence of a second attempt at nesting, as determined by the qualified biologist.

The project proponent shall be responsible for implementation of this mitigation measure with oversight by the Monterey County Resource Management Agency. Compliance with this measure shall be documented and submitted to the county.

Implementation of this mitigation measure would eliminate the potential impact by requiring pre-construction surveys for nesting birds, and avoidance of any active nest(s) if present on or adjacent to the development footprint.

IMPACT Impede Movement of Common Wildlife (Less than Significant)

Since the 15.64-acre project is undeveloped, the proposed project, through the construction of new buildings and site improvements, would impede to a limited degree the local movement of common wildlife species due to habitat loss. This, however, is a less than significant environmental impact. Considerable open space areas with similar habitat are immediately adjacent to the west of the project site, and even if this area to the west develops as part of the Ferrini Ranch project, open space areas will be retained that allow the movement of local wildlife species. Since this is a less than significant environmental impact no mitigation measures are required.

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TABLE OF CONTENTS

8.0 GREENHOUSE GAS EMISSIONS 8-1

8.1 Environmental Setting 8-1

8.2 Regulatory Setting 8-8

8.3 Thresholds or Standards of Significance 8-16

8.4 Environmental Impact Analysis 8-20

8.5 Impact Summary and Mitigation Measures 8-23

Figures

No table of figures entries found.

Tables

Table 8-1 GHG Types and Their Contribution to Global Warming 8-5

Table 8-2 GHG Global Warming Potentials 8-6

Table 8-3 1990 California Greenhouse Gas Inventory for Residential Land Use Related Emissions Sectors 8-18

Table 8-4 Unmitigated 2020 Operational Phase GHG Emissions (MT/year) 8-21

8.0
Greenhouse Gas Emissions

This section of the EIR summarizes the greenhouse gas (GHG) environmental and regulatory setting, identifies climate change impacts from project implementation, and specifies mitigation measures for significant impacts. This analysis is based in part on the results of GHG modeling using the California Emissions Estimator Model (CalEEMod). The CalEEMod results are included in Appendix C. Additional information regarding related regulations and legislation was utilized, as was information from the California Energy Commission and the California Air Resources Board (CARB).

During the Draft EIR's (Notice of Preparation) NOP review period, no comments regarding the greenhouse gas emissions of the proposed project were received. The County's NOP and comment letters on the NOP are included in Appendix B.

8.1 Environmental Setting

Climate Change Science

The international scientific community has concluded with a high degree of confidence that human activities are causing an accelerated warming of the Earth's atmosphere. The resulting changes in climate has serious global implications and, consequently, human activities that contribute to climate change may have a potentially significant effect on the environment. In recent years, concern about climate change and its potential impacts has risen dramatically and that concern has translated into a range of international treaties and national and regional agreements aimed at diminishing the rate that global warming is occurring and potentially halting its environmental effects. The federal government is addressing concerns about climate change through a range of initiatives and regulatory actions. Many states and local agencies, private sector interests, and other public and private interests have also taken initiative to combat climate change. At the state level, California has taken a leadership role in tackling climate change, as evidenced by the programs outlined in the Regulatory Setting section below.

Causes and Effects of Climate Change

The greenhouse effect naturally regulates the Earth's temperature; however, human activity, industrialization and population growth has increased the intensity of the greenhouse effect by releasing increasing amounts of greenhouse gasses GHGs into the atmosphere. GHGs can

remain in the atmosphere for decades. The GHG emissions that are already in the atmosphere will continue to cause climate change for years to come, just as the warming temperatures already being experienced are at least partially the result of emissions produced in the past. Climatic changes are happening now and are projected to increase in frequency and severity before the benefits of GHG emission reductions will be realized. Increased concentrations of GHGs in the atmosphere result in increased air, surface, and ocean temperatures. Many of the effects and impacts of climate change stem from resulting changes in temperature and meteorological responses to those changes.

Rising Temperatures

The Intergovernmental Panel on Climate Change, which includes more than 1,300 scientists from the United States and abroad, estimated that over the last century, global temperatures have increased by about 1.3 degrees Fahrenheit (°F). The Intergovernmental Panel on Climate Change forecasts indicate that global temperatures can be expected to continue to rise between 2.5 and 10°F over the next century. According to the California Climate Adaptation Strategy (California Natural Resources Agency 2009), average state temperatures are currently predicted to increase 1.8 to 5.4°F by 2050 and 3.6 to 9°F by 2100. Some regional models show average temperatures in California increasing as much as 10.8°F. Achieving the low emission scenarios has become unlikely, while the probability of reaching the medium and high scenarios is believed to be more likely.

Locally, Monterey County has already experienced a rise in average temperatures. Winter weather conditions are now of a shorter duration, with warmer temperatures than were typical 30 years ago. As a whole, temperatures in California have already risen 1°F on average over this time period. According to Cal-Adapt, a climate change projection modeling tool developed by California Energy Commission, temperatures in the Monterey County area have historically averaged about 58.1°F. Temperatures in the County are projected to further rise between 2.9 and 4.9°F by 2090, based on average low and high emissions scenarios (California Energy Commission 2016).

Precipitation Levels

Precipitation levels are difficult to predict compared to other indicators of climate change. Annual rain and snowfall patterns vary widely from year to year, especially in California. Generally, higher temperatures increase evaporation and decrease snowfall, resulting in an overall drier climate. On average, projections show little change in total average annual precipitation in California. Furthermore, among several models, precipitation projections do not show any consistent predictable trend for the next century other than the Mediterranean seasonal precipitation pattern is expected to continue, with most precipitation falling during winter from storms originating in the North Pacific. One of the four climate models prepared

by the California Climate Adaptation Strategy (California Natural Resources Agency 2009) projects slightly wetter winters, and another model projects slightly drier winters with a 10 to 20 percent decrease in total annual precipitation. However, even modest changes, particularly decreases, in precipitation would have a significant impact because California ecosystems are conditioned to historical precipitation levels and water resources are nearly fully utilized. In Monterey County, changes in precipitation can have profound effects on the agricultural industry, a major economic contributor to the area.

Water Supply

In conjunction with population growth, climate change is expected to increase pressure on and competition for water resources, further exacerbating already stretched water supplies. Decreasing snowpack and spring stream flows and increasing demand for water from a growing population and hotter climate could lead to increasing water shortages. Water supplies are also at risk from rising sea levels and salt water intrusion. Competition for water between cities, farmers, and the environment is expected to increase.

Anticipated changes to source water conditions include more intense and less predictable storm events, longer drought periods, reduced snowpack at lower elevations, and earlier spring run-off. Changes in source water quantity and quality may therefore impact the treatment necessary to produce potable drinking water. These changes could result in additional required treatment processes and increased costs for treated drinking water in order to avoid potential for human health risk via drinking water consumption.

These affects to water supply are expected to affect communities throughout the globe, including Monterey County communities.

More Frequent and Extreme Storm Events

Extreme weather, in addition to drought, is expected to become more common throughout California. More extreme storm events are expected to increase water runoff to streams and rivers during the winter months, heightening flood risks. Warmer ocean surface temperatures have contributed to warmer and wetter conditions in the Sierra Nevada, increasing flood risk. Strong winter storms may produce “atmospheric rivers” that transport large amounts of water vapor from the Pacific Ocean to the California coast. These atmospheric rivers often persist for days, dropping heavy rain or snow. As the strength of these storms increase and transport increased amounts of precipitation, the risk of flooding is accordingly increased.

Diminished Air Quality

Climate change is expected to exacerbate air quality problems by increasing the frequency, duration, and intensity of conditions conducive to air pollution formation. Higher

temperatures and increased ultraviolet radiation from climate change are expected to facilitate the chemical formation of more secondary air pollutants from ground-level sources. Conversely, decreased precipitation is expected to reduce the amount of particulates cleansed from the air.

While there are variations throughout the state, Californians experience the worst quality air in the nation. More than 90 percent of California's population lives in areas that have ozone or particulate matter levels above the State air quality standard. Incidents of wildfires in nearby foothills and mountain regions have already grown in frequency and severity and are expected to increase, further contributing to air quality problems.

The project site is located in the North Central Coast Air Basin ("air basin"). As discussed in Section 6.0 of this EIR, the air basin is in non-attainment with State mandated thresholds for ozone and suspended particulate matter.

Environmental Protection

Climate change effects will have broad impacts on local and regional ecosystems, habitats, and wildlife as average temperatures increase, precipitation patterns less predictable, and more extreme weather events occur. Species have adapted to natural and more gradual, environmental changes for millions of years, however, species that cannot adapt to foreseeable changes in climate are at risk of extinction. Conversely, other more adaptable species could increase their habitat range. Overall, the risk of extinction could increase for many species. As temperatures increase, California vegetation is also expected to change. Generally, desert and grassland vegetation is projected to increase while forest vegetation is projected to decline. The natural cycle of plant flowering and pollination, as well as the temperature conditions necessary for a thriving locally-adapted agriculture, may also be affected. Perennial crops, such as grapes, may take years to recover. Increased temperatures also provide a foothold for invasive species of weeds, insects, and animals.

Social Vulnerability to Climate Change

The impacts of climate change will not affect people equally. Some people are more likely to be impacted than others. People exposed to the most severe climate-related hazards are often those least able to cope with the associated impacts, due to their limited adaptive capacity. Globally, climate change is expected to have a greater impact on larger populations living in poorer developing countries that rely on natural resources and agricultural systems that will likely be affected by changing climates.

Certain groups in developed countries like the United States will also experience more impacts from climate change than others. People in rural areas are more likely to be affected by climate change impacts, such as droughts or severe storms, compared to their urban

counterparts. However, certain groups living in cities will also be at higher risk than others. People who are at greatest risk for the impacts described earlier in this section include children, the elderly, those with existing health problems (e.g.., obese youth), the socially and/or economically disadvantaged (e.g., households that speak or understand little English, low income households, the unemployed, populations without a high school diploma), those who are less mobile (e.g. living in group quarters, households without a vehicle), and those who work outdoors. Place of residence is another vulnerability indicator, as renters, households without air conditioning, households lacking access to grocery stores, households in treeless areas, and households on impervious land cover are also more vulnerable to climate change impacts.

Health Effects/Illness

As temperatures rise from global warming, the frequency and severity of heat waves will grow and increase the potential for bad air quality days, which can lead to increases in illness and even death due to dehydration, heart attack, stroke and respiratory disease. Additionally, dry conditions can lead to a greater number of wildfires producing smoke that puts people with asthma and respiratory conditions at risk of illness or death.

Higher temperatures and the increased frequency of heat waves are expected to significantly increase heat-related illnesses, such as heat exhaustion and heat stroke, while also exacerbating conditions associated with cardiovascular and respiratory diseases, diabetes, nervous system disorders, emphysema, and epilepsy. An increase of 10°F in average daily temperature is associated with a 2.3 percent increase in mortality. During heat waves mortality rates can increase to about nine percent. As temperatures in Monterey County increase, vulnerable populations such as children, the elderly, people with existing illnesses, and people who work outdoors will face the greatest risk of heat-related illness.

Flood Risk

Increased flood frequency and elevated flood risk are expected in California as a result of sea level rise, more intense storm events resulting in increased storm water runoff, and shifts in the seasonal timing of rainfall and snowpack runoff.

Greenhouse Gas Types

GHGs are emitted by both natural processes and human activities. The human-produced GHGs most responsible for global warming and their relative contribution to it are carbon dioxide, methane, nitrous oxide and chlorofluorocarbons. The contribution of these GHGs to the U.S. inventory of GHGs in 2013 is summarized in Table 8-1, GHG Types and Their Contribution to Global Warming.

Table 8-1 GHG Types and Their Contribution to Global Warming

Greenhouse Gas	Percent	Typical Sources
Carbon dioxide (CO_2)	81	Combustion of fuels, solid waste, wood
Methane (CH_4)	11	Fuel production/combustion; livestock, decay of organic materials
Nitrous Oxide (N_2O)	6	Combustion of fuels, solid waste; agricultural and industrial processes
Chlorofluorocarbons (CFCs)	3	Industrial processes

SOURCE: United States Environmental Protection Agency 2017.
NOTES: Percentages reflect weighting for global warming potential.

Greenhouse Gas Global Warming Potentials

Each type of GHG has a different capacity to trap heat in the atmosphere and each type remains in the atmosphere for a particular length of time. The ability of a GHG to trap heat is measured by an index called the global warming potential expressed as carbon dioxide equivalent. Carbon dioxide is considered the baseline GHG in this index and has a global warming potential of one. Methane has a global warming potential of 21 times that of carbon dioxide and nitrous oxide has a global warming potential of 310 times that of CO_2. The families of chlorofluorocarbons, hydrofluorocarbons and perfluorocarbons have a substantially greater global warming potential than other GHGs, generally ranging from approximately 1,300 to over 10,000 times that of CO_2. See Table 8-2, GHG Global Warming Potentials, below, for reference on the global warming potential of various GHGs.

Table 8-2 GHG Global Warming Potentials

Greenhouse Gas	Atmospheric Lifetime (Years)	Global Warming Potential
Carbon Dioxide CO2	50-200	1
Methane CH4	12 (+/- 3)	21
Nitrous Oxide N2O	120	310
HFC-23	264	11,700
HFC-134a	14.6	1,300
HFC-152a	1.5	140
PFC Tetrafluoromethane CF4	50,000	6,500
PFC Hexafluoroethane C2F6	10,000	9,200
Sulfur Hexaflouride SF6	3,200	23,900

SOURCE: United Nations Framework Convention on Climate Change2017

While CO_2 represents the vast majority of the total volume of GHGs released into the atmosphere, the release of even small quantities of other types of GHGs can be significant for their contribution to climate change.

The GHG volume produced by a particular source is often expressed in terms of carbon dioxide equivalent (CO_2e). Carbon dioxide equivalent describes how much global warming a given type of GHG will cause, with the global warming potential of CO_2 as the base reference. It is useful because it allows comparisons of the impact from many different GHGs, such as methane, perfluorocarbons or nitrous oxide. If a project is a source of several types of GHGs, their individual global warming potential can be standardized and expressed in terms of CO_2e.

Inventories of Greenhouse Gases

California GHG Emissions Inventory

California is a substantial contributor of global greenhouse gases. Based on (California Air Resources Board) CARB's most recent state GHG inventory, a net of about 459.28 million tons of CO_2e were generated in 2013 (California Air Resources Board 2015). In 2013, about 37 percent of all GHG gases emitted in the state came from the transportation sector. Industrial uses and electric power generation (in-state generation and out-of-state generation for imported electricity) were the second and third largest categories at about 23 percent and 20 percent, respectively. The commercial and residential use sectors combined to generate about 12 percent of the 2013 emissions, while the agricultural sector contributed about eight percent.

Monterey County GHG Emissions Inventory

Greenhouse gas emissions generated in Monterey County represent a small fraction of the statewide emissions inventory. In 2006, the county conducted a GHG emissions inventory as part of its General Plan update (Monterey County 2010). In 2006, 1,394,404 metric tons of CO_2e was estimated to have been generated in the county (Monterey County 2008, Table 4.3-11). As with most cities and counties in the state, the primary source of GHG emissions is the transportation sector (cars and trucks). These on-road sources of emissions accounted for about 46 percent of all emissions generated in the county compared with the approximately 15 percent of total emissions created by electricity generation, 14 percent by industrial processes, 14 percent from combustion of natural gas, eight percent from agricultural equipment fuel use, and two percent from landfill emissions.

Policies are included in the county's 2010 general plan that serve as mitigation for potential GHG impacts related to build-out of the plan. The County of Monterey updated the municipal inventory component of the 2006 inventory in 2013 pursuant to that mitigation and Policy OS-10.15 of the general plan to address GHG emissions from county operations (*Monterey County's Municipal Climate Action Plan: Greenhouse Gas Reduction Plan for County Operations* June 2013). The *Monterey County's Municipal Climate Action Plan: Greenhouse Gas*

Reduction Plan for County Operations serves as one component of the county's larger, community-wide climate action plan.

Existing Sources of GHG Emissions within the Project Site

The project site is vacant and there is no current use of the site aside from a portion used for occasional grazing. There are no notable existing baseline GHG emission sources. The site does not contain important sources of sequestered carbon such as trees that would be lost as a result of its conversion to urban use.

8.2 REGULATORY SETTING

State and regional policies and regulations pertaining to climate change are summarized below. These provide context for how climate change is being addressed and identify policy and regulatory actions whose implementation would lessen the contribution of the proposed project to climate change. The federal government is also taking significant regulatory steps toward addressing climate change. Generally, California legislation and regulations are as comprehensive, or are more comprehensive, than federal actions; therefore, this regulatory section focuses on state activity.

State

California Assembly Bill No. 1493 ("Pavley I Rule")

AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light-duty trucks by improving fuel efficiency requirements. Pavley I requirements apply to these vehicles in the model years 2009 to 2016. CARB has estimated the effectiveness of Pavley I standards on vehicle emission factors and estimates that these standards will reduce GHG emissions in the transportation sector by 20 percent in 2020 and 25 percent in 2035 above and beyond a scenario without these standards.

Executive Order S-03-05

The Governor signed this executive order on June 1, 2005. It recognizes the anticipated effects of climate change, such as increased temperatures, reduced Sierra Nevada snowpack, worsened air quality, and sea level rise among others. The executive order includes GHG emission reduction targets for the purpose of combating these effects. GHG emissions are to be reduced to 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050.

California Assembly Bill 32 (Global Warming Solutions Act)

In September 2006, Governor Arnold Schwarzenegger signed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 establishes regulatory, reporting,

and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020 consistent with Executive Order S-03-05. This reduction will be accomplished through an enforceable statewide cap on GHG emissions that was phased in starting in 2012. To effectively implement the cap, AB 32 directs CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources.

Executive Order S-01-07 Low Carbon Fuel Standard

Issued on January 18, 2007, this order mandates that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020, and that a Low Carbon Fuel Standard for transportation fuels be established. The Low Carbon Fuel Standard has been developed and implemented by CARB. CARB has incorporated the GHG emissions reductions accruing to the Low Carbon Fuel Standard into the 2014 Scoping Plan as described above.

Executive Order S-13-08

This Executive Order enhances the state's management of climate impacts from sea level rise, increased temperatures, shifting precipitation and extreme weather events. In December 2009, the California Natural Resources Agency released the 2009 California Climate Adaptation Strategy Discussion Draft. The document provides interim guidance to state and local agencies on planning for the impacts and risks of climate change.

California Senate Bill 375 (Sustainable Communities Strategy)

This 2008 bill sets forth a mechanism for coordinating land use and transportation on a regional level for the purpose of reducing GHGs. The focus is to reduce miles traveled by passenger vehicles and light trucks. CARB is required to set GHG reduction targets for each metropolitan region for the years 2020 and 2035. Each of California's metropolitan planning organizations then prepares a sustainable communities strategy that demonstrates how the region will meet its GHG reduction target through integrated land use, housing, and transportation planning. Once adopted by the metropolitan planning organizations, the Sustainable Communities Strategy is to be incorporated into that region's federally enforceable regional transportation plan. If a metropolitan planning organization is unable to meet the targets through the Sustainable Communities Strategy, then an alternative planning strategy must be developed which demonstrates how targets could be achieved, even if meeting the targets is deemed to be infeasible.

AMBAG is the metropolitan planning organization responsible for preparing the sustainable communities strategy. The Sustainable Communities Strategy is embedded in AMBAG's *2035 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties* (Association of Monterey Bay Area Governments 2014) (MTP/SCS). The environmental effects of implementing the MPT/SCS were evaluated in the *Final Environmental Impact Report for the 2035 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional*

Transportation Plans for Monterey, San Benito, and Santa Cruz Counties (Association of Monterey Bay Area Governments 2014). The Sustainable Communities Strategy sets forth a forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, is intended to reduce GHG emissions from passenger vehicles and light duty trucks to achieve the regional GHG reduction targets set by CARB.

CARB set targets for the AMBAG region as "not to exceed 2005 emissions levels" by 2020 and a five percent reduction from 2005 levels by 2035. AMBAG adopted these standards in September 2010. These targets apply to the AMBAG region as a whole for all on-road light duty trucks and passenger vehicles emissions, and not to individual cities or sub-regions. Therefore, AMBAG, through the 2035 MTP/SCS, must maintain or reduce these levels to meet the 2020 target and reduce these levels to meet the 2035 targets.

SB 375 specifically states that local governments retain their autonomy to develop and adopt local General Plan policies and land uses. The 2035 MTP/SCS provides a regional policy foundation that local governments may build upon, if they so choose. The 2035 MTP/SCS includes and accommodates the quantitative growth projections for the region. In addition, the 2035 MTP/SCS EIR lays the groundwork for the streamlined CEQA review of qualifying development projects. Such projects are defined as Transit Priority Projects that are located within an Opportunity Area that meet specific criteria including:

- Consistent with the Sustainable Communities Strategy;
- Contains at least 50 percent residential use;
- Proposed to be developed at a minimum 20 dwelling units per acre; and
- Located within one half mile of a major transit stop or high quality transit corridor that is included in the MTP/SCS.

AB 32 Scoping Plan

In December 2008, CARB adopted the Climate Change Scoping Plan, which contains the main strategies California will implement to achieve reduction of approximately 118 million metric tons (MMT) CO_2e, or approximately 22 percent from the state's projected 2020 emission level of 545 MMT of CO_2e under a business-as-usual scenario This is a reduction of 47 MMT CO_2e, or almost 10 percent, from 2008 emissions. CARB's original 2020 projection was 596 MMT CO_2e, but this revised 2020 projection takes into account the economic downturn that occurred in 2008. The Scoping Plan also includes CARB recommended GHG reductions for each emissions sector of the state GHG inventory. CARB estimates the largest reductions in GHG emissions would be by implementing the following measures and standards:

- improved emissions standards for light-duty vehicles (26.1 MMT CO_2e);

- the Low-Carbon Fuel Standard (LCFS) (15.0 MMT CO_2e);
- energy efficiency measures in buildings and appliances (11.9 MMT CO_2e); and
- renewable portfolio and electricity standards for electricity production (23.4 MMT CO_2e).

In 2011, CARB adopted a cap-and-trade regulation. The cap-and-trade program covers major sources of GHG emissions in the state such as refineries, power plants, industrial facilities, and transportation fuels. The cap-and-trade program includes an enforceable emissions cap that will decline over time. The state distributes allowances, which are tradable permits, equal to the emissions allowed under the cap. Sources under the cap are required to surrender allowances and offsets equal to their emissions at the end of each compliance period. Enforceable compliance obligations started in 2013. The program applies to facilities that comprise 85 percent of the states GHG emissions.

With regard to land use planning, the scoping plan expects that reductions of approximately 3.0 MMT CO_2e will be achieved through implementation of Senate Bill (SB) 375.

California Senate Bill 97 (CEQA Guidelines Amendments)

As directed by SB 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines for GHG emissions on December 30, 2009. On February 16, 2010, the Office of Administrative Law approved the Amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. The amendments became effective on March 18, 2010. CEQA allows lead agencies to analyze and mitigate the significant effects of GHG emissions at a programmatic level, such as in a general plan, or as part of a separate plan (e.g., a climate action plan) to reduce GHG emissions.

California Green Building Standards Code

The Green Building Standards Code (CALGreen), which requires all new buildings in the state to be more energy efficient and environmentally responsible, took effect on January 1, 2011. These comprehensive regulations will achieve major reductions in greenhouse gas emissions, energy consumption and water use.

Renewable Energy Legislation/Orders

The California Renewable Portfolio Standard Program (RPS) requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet a portion of their retail sales with renewable power. SB 1078, adopted in 2002, required 20 percent of retail sales to be met with renewable power by 2017. The requirement was accelerated to 20 percent by 2010 by SB 107 in 2006. The program was subsequently expanded in September 2010 by requiring all utilities to meet a 33 percent target by 2020. Governor Brown then signed A8B 350, the Clean Energy and Pollution Reduction Act of 2015, which increases the RPS requirement to 50 percent of all retail sales by 2030.

Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document

In 2011, CARB released this document to provide a more in-depth analysis of the five alternatives to the scoping plan that were originally included in that document. The supplemental analysis was conducted in response to litigation brought against CARB which challenged the adequacy of the alternatives analysis contained in the scoping plan. The Supplement included an update of the business-as-usual GHG emissions projections that were contained in the scoping plan. The update is based on more recent economic conditions (including the economic downturn) and on reduction measures from the scoping plan that are already in place). The updated 2020 business-as-usual emissions forecast levels of 507 MMT CO_2e is lower than that contained in the 2008 scoping plan. With this forecast, only a 16 percent reduction below business-as-usual levels would be needed to return to 1990 levels (e.g. 427 MMT CO_2e) by 2020.

Advanced Clean Cars

In January 2012, CARB adopted an Advanced Clean Cars program aimed at reducing both smog-causing pollutants and GHG emissions for vehicles model years 2017-2025. Advanced Clean Cars program refers to a suite of regulations that combine what were previously independent regulations that targeted GHG emissions reductions and smog emissions from passenger cars and light-duty trucks. The regulations focus on substantially increasing the number of plug-in hybrid cars and zero-emission vehicles in the vehicle fleet and on making fuels such as electricity and hydrogen readily available for these vehicle technologies.

The Advanced Clean Cars program would provide major reductions in GHG emissions. By 2025, the program is projected to result in a 34 percent reduction in GHG emissions from new passenger cars and trucks above and beyond a scenario without the Advanced Clean Cars program.

2014 Scoping Plan Update

In response to comments on the 2008 scoping plan, and AB 32's requirement to update the scoping plan every five years, CARB revised and reapproved the scoping plan, and prepared the first update to the 2008 scoping plan in 2014 (2014 scoping plan). The 2014 scoping plan contains the main strategies California will implement to achieve a reduction of 80 MMT of CO_2e emissions, or approximately 16 percent, from the state's projected 2020 emission level of 507 MMT of CO_2e under the business-as-usual scenario defined in the 2014 scoping plan. The 2014 scoping plan also includes a breakdown of the amount of GHG reductions CARB recommends for each emissions sector of the state's GHG inventory. Several strategies to reduce GHG emissions are included: the Low Carbon Fuels Standard, the Pavley Rule, the Advanced Clean Cars program, the Renewable Portfolio Standard, and the Sustainable Communities Strategy.

Executive Order B-30-15

Issued on April 29, 2015, this order advances the intent of Executive Order S-03-05 by establishing a California GHG reduction target of 40 percent below 1990 levels by 2030. The new emission reduction is intended to be an interim target that maintains a reduction trajectory towards meeting the state's goal of reducing emissions to 80 percent below 1990 levels by 2050 as identified in Executive Order S-03-05. This is in line with the scientifically established levels needed in the U.S. to limit global warming below two degrees Celsius - the warming threshold at which many scientists say there will likely be major climate disruptions, such as "super droughts" and rising sea levels.

California Senate Bill 350 (Clean Energy and Pollution Reduction Act of 2015)

SB 350 was adopted in October 2015. It has several aspects. Among its requirements are that the State Energy Resources Conservation and Development Commission must establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final-end uses of retail customers by January 1, 2030. Local publicly owned electric utilities are now required to establish annual targets for energy efficiency savings and demand reduction consistent with this goal. The bill is also intended achieve GHG reductions through increased investments in transportation electrification and notes that reducing GHGs to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050, consistent with Executive Orders S-03-05 and S-30-15, will require widespread transportation electrification.

California Senate Bill 32 (California Global Warming Solutions Act of 2006: Emissions Limit)

This bill was adopted in September 2016. It sets a new statewide GHG emissions reduction target of at least 40 percent below 1990 levels by the end of 2030. It represents an interim GHG reduction target designed to ensure that the state continues to adopt rules and regulations that keep the state on track to meet the statewide GHG reduction goal of 80 percent below 1990 levels by 2050 set forth in Executive Order S-03-05. The emissions reduction goal set in SB 32 sets expectations for GHG emissions reductions in the state in the post-AB 32 2020 environment given that emissions reduction goals set forth in AB 32 will have been reached by 2020.

Title 24 Building Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were first established in 1978 to reduce California's energy consumption. The scoping plan requires improved building energy

efficiency with each new update to Title 24, which is updated every three years. The standards were most recently updated in 2016 and went into effect in January 2017.Energy efficient buildings require less electricity, natural gas, and other fuels, the use of which creates GHG emissions. The 2016 update requires new buildings to become more energy-efficient than ever before by increasing the energy efficiency of new construction by 20 percent for residential uses and 25 percent for non-residential uses, compared to the previous 2008 Title 24 standards.

Title 24 California Green Building Standards Code

The Green Building Standards Code (CALGreen) (California Code of Regulations, Title 24, Part 11), which requires all new buildings in the state to be more energy efficient and environmentally responsible, took effect on January 1, 2011. The standards were most recently updated in 2016 and went into effect in January 2017. These comprehensive regulations will achieve major reductions in greenhouse gas emissions, energy consumption and water use.

California Assembly Bill 197 (2017 Scoping Plan)

With the passage of AB 32, the California Legislature also passed companion legislation AB 197, which provides additional direction for developing the Scoping Plan. CARB has held three public meetings to receive input on the Scoping Plan and expects to adopt the updated Scoping Plan in 2018. The updated Scoping Plan represents a second update to the original Scoping Plan called for by AB 32 to reflect the 2030 target of reducing statewide GHG emissions by 40 percent below 1990 levels set by Executive Order B-30-15 and codified by SB 32. The GHG reduction strategies included in the plan that CARB will implement to meet the target:

- SB 350 - achieve 50 percent Renewables Portfolio Standard (RPS) by 2030 and doubling of energy efficiency savings by 2030;
- Low Carbon Fuel Standard-increased stringency (reducing carbon intensity 18 percent by 2030, up from 10 percent in 2020);
- Mobile Source Strategy (Cleaner Technology and Fuels Scenario) maintaining existing GHG standards for light-and heavy-duty vehicles, put 4.2 million zero-emission vehicles on the roads, and increase zero-emission buses, delivery and other trucks by 2030;
- Sustainable Freight Action Plan - improve freight system efficiency, maximize use of near-zero emission vehicles and equipment powered by renewable energy, and deploy over 100,000 zero-emission trucks and equipment by 2030;
- Short-Lived Climate Pollutant Reduction Strategy - reduce emissions of methane and hydrofluorocarbons 40 percent below 2013 levels by 2030 and reduce emissions of black carbon 50 percent below 2013 levels by 2030;

- SB 375 Sustainable Communities Strategies - increased stringency of 2035 targets;
- Post-2020 Cap-and-Trade Program - declining caps, continued linkage with Québec and Ontario, Canada;
- 20 percent reduction in greenhouse gas emissions from the refinery sector; and
- By 2018, develop an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Local

Monterey Bay Air Resources District

The Monterey Bay Air Resources District ("air district") has been in the process of developing guidance for evaluation of GHG emissions impacts for several years. To date, the air district has not adopted CEQA guidance for analysis of GHG effects of land use projects, nor has it prepared a qualified GHG reduction plan for use or reference by local agencies.

In the past, the air district recommended that thresholds of significance adopted by the San Luis Obispo Air Pollution Control District could be used as a reference for assessing impacts of land use projects planned within the local air district. This reference was made due to the air district's belief that conditions within the San Luis Obispo Air Pollution Control District were similar to those within the local air district. The Luis Obispo Air Pollution Control District developed substantial evidence for the formulation of quantified thresholds of significance. The thresholds are 4.9 metric tons/service population year or 1,150 metric tons. The service population metric approach is described for its application to the proposed project in the Environmental Impact Analysis section below. However, the San Luis Obispo Air Pollution Control District's thresholds were not utilized for the proposed project impact analysis due primarily to a recent California Supreme Court ("Newhall Ranch" case) decision which suggests that an appropriate threshold should address the land use character of the proposed project being analyzed. The Supreme Court case is also summarized in the Environmental Impact Analysis section below.

Monterey County General Plan

The 2010 Monterey County General Plan contains a policy to develop and adopt a Greenhouse Gas (GHG) Reduction Plan within 24 months of General Plan adoption (Policy OS-10.11). A reduction plan for county municipal operations has been adopted, but the county still needs to prepare a reduction plan to address community GHGs, including GHGs from land use projects. Once the county adopts a qualified GHG reduction plan, compliance of future land use projects with that plan will be the basis for determining the significance of their impacts on global climate change.

Las Palmas Ranch Specific Plan

The Las Palmas Ranch Specific Plan includes the following energy conservation policies. Consistency with these policies is addressed in the Energy section of this EIR.

Energy Conservation Policies

> 1. Each residential unit should be afforded adequate solar access for the operation of active and passive solar systems. Locating structures with their major axis oriented within 22.5 degrees of true east/west is generally the best means to insure adequate south-facing solar access. For single-family homes, the orientation is fairly simple to implement as is full access to the south wall for passive solar design. For multi-family units, orientation and access are more difficult; generally south roof access for active space hearing or domestic water hearing systems is considered sufficient.
>
> 2. Careful design of structures to utilize solar access and to control heat loss and heat gain can achieve significant energy conservation. When these design elements are coupled with passive design features (thermal storage units, south facing glass, domestic hot water systems and other energy conserving components), the energy conservation potential greatly increases. Support structures built by the developer such as commercial areas, swimming pools, recreation and community buildings should make maximum use of alternate energy sources both to reduce operation costs and to serve as community examples.

8.3 THRESHOLDS OR STANDARDS OF SIGNIFICANCE

CEQA Guidelines Appendix G indicates that a project may have a significant effect on the environment if it would have any of the effects listed below. The County utilizes the list of effects as its standards of significance for CEQA analyses. If any of the standards of significance are not applicable to the proposed project or the project would have no related impact, this is so noted, and no further evaluation regarding the effect is provided.

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Selection of a Threshold of Significance/Reduction Target on which to Base Analysis of Project Effects

State CEQA Guidelines Section 15064.4 addresses the approach for evaluating the significance of GHG emissions effects. Lead agencies are encouraged to use a model or models to estimate GHG emissions volumes then determine whether the emissions exceed a

threshold that the lead agency determines to be significant. State CEQA Guidelines Section 15064.7(c) states that when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts. This discussion summarizes the County's approach for considering the GHG impacts of the proposed project in light of a changing State legislative/regulatory environment and the long-term buildout timeframe for the proposed project.

AB 32 and the 2008/2014 Scoping Plan Guidance

With the adoption of AB 32 in 2006, local and regional agencies began to align their CEQA processes and craft GHG thresholds of significance to be consistent with the year 2020 reduction goal embedded in AB 32 and further operationalized in the subsequent 2008 and 2014 CARB scoping plans. However, the defensibility of using AB 32 and the 2008/2014 Scoping Plans as a basis for a project-specific threshold of significance for local projects has been called into question based on a 2015 California Supreme Court decision in *Center for Biological Diversity v. California Department of Fish and Wildlife* (commonly referred to as the "Newhall Ranch" case). In November 2015, the court issued a ruling that, in short, concluded that the statewide 29 percent below business-as-usual reduction specified in the 2008 Scoping Plan can be used as a threshold of significance for individual development projects. However, the court also determined that if this threshold is used, substantial evidence must be provided to demonstrate that achieving this reduction at an individual project level is sufficient to determine that the project has a less-than- significant GHG emissions impact. The court found that the CEQA document which was the subject of the lawsuit did not provide this evidence.

The ruling called into question what has been a standard CEQA analysis methodology for assessing GHG impacts of individual projects within a city or air district where neither agency has adopted a qualified GHG reduction plan. The court provided no clear guidance on appropriate thresholds of significance for individual development projects that might be used to assess their GHG impacts. It did, however, suggest several options for evaluating the cumulative impacts of proposed land use developments. One of these is reliance on "existing numerical thresholds of significance for greenhouse gas emissions." As noted above, neither the County of Monterey nor the Monterey Bay Air Resources District (air district) have adopted numerical thresholds of significance or qualified GHG reduction plans that could otherwise be used as a threshold of significance for the proposed project in light of the Newhall Ranch case.

Table 8-3 of the 1990 California Greenhouse Gas Inventory for Residential Land Use Related Emissions Sectors, shows the adjusted residential-based, land use-driven emissions inventory for 1990 for a residential project. Total land use driven emissions were projected at

272.85 million metric tons (MMT) CO_2e in 1990. This emissions volume represents the numerator for an efficiency-based threshold of significance for the year 2020.

To account for the Newhall Ranch decision, an efficiency-based GHG threshold of significance is being used in this EIR that is specific to assessing impacts from new land use development of the type proposed and that is based on Scoping Plan guidance. The efficiency-based metric represents an emissions threshold at or below which the emissions from local land use projects are below a volume needed to help meet the state's GHG emissions reduction target established under AB 32. AB 32 is the applicable GHG reduction plan because the proposed project is expected to be operational before 2020. The efficiency-based threshold for the proposed project is calculated by dividing emissions associated with statewide residential and commercial uses (sources attributable to land use projects) by the sum of jobs and residents within the state. The sum of jobs and residents is called the "service population." The efficiency approach allows lead agencies to assess whether any given project or plan would accommodate population and employment growth in a way that is consistent with the emissions limit established under AB 32.

Table 8-3 1990 California Greenhouse Gas Inventory for Residential Land Use Related Emissions Sectors

Land Use Type	Emissions (MMT CO2e)
On-Road Transportation	
Passenger Cars	63.77
Light Duty Trucks	44.75
Motorcycles	0.43
Heavy Duty Trucks	29.03
Freight	0.02
Subtotal	138.00
Electricity Generation In-State	
Commercial Cogeneration	0.70
Merchant Owned	2.33
Transmission and Distribution	1.56
Utility Owned	29.92
Subtotal	34.51
Electricity Generation In-State	
Specified Imports	29.61
Transmission and Distribution	1.02
Unspecified Imports	30.96
Subtotal	61.59

Residential	
Household Use	29.66
Subtotal	29.66
Industrial	
Landfills	6.26
Domestic Wastewater Treatment	2.83
Subtotal	9.09
Total Emissions	272.85

SOURCE: California Air Resources Board. No Date.

AB 32 establishes a statewide goal of reducing emissions to 1990 levels by 2020. Accordingly, a 2020 efficiency-based threshold of significance that is consistent with this target can be calculated using the components of the 1990 statewide GHG emissions inventory that are land use based. GHG emissions related to individual land use sector development types (e.g. residential and commercial) can be isolated out of the 1990 statewide emissions inventory by eliminating emissions sources that are not land use driven and that would not accommodate projected new population or employment growth. For example, emissions associated with ocean transport or agriculture are not related to new land use development projects. Isolating emissions from the land use-driven sectors of the overall statewide inventory enables development of a GHG efficiency metric that is specific to the type of land use project under consideration. For example, emissions associated with on-road transportation, electricity, natural gas, wastewater treatment, and solid waste are typically part of the GHG emissions inventory for new land use development projects. The same GHG emissions sources identified in the statewide inventory can be isolated and used to create an AB 32-based, efficiency-based threshold of significance that is specific to a land use project.

As noted above, the service population is the sum of population and employment projections for any selected target year and represents the denominator in the efficiency metric calculation. Year 2020 population for the State of California is projected at 40,643,643 (California Department of Finance 2015), while Year 2020 employment is projected at 15,199,000 jobs (California Department of Transportation 2015). Employment projections for 11 different employment sectors are provided for Year 2020 projections; farm and manufacturing jobs are not included, as neither sector is land use driven. The 2020 service population equals 55,842,643 (40,643,643 population + 15,199,000 employment).

Using the statewide residential land use-related 1990 GHG emissions volume and the projected 2020 service population as shown above, the 2020 efficiency-metric threshold of significance is: 272.85 MMT CO_2e/55,842,643 = 4.88 MT CO_2e per service population. This is the threshold of significance used in this EIR.

As noted in the Regulatory Setting section above, the San Luis Obispo Unified Air Pollution Control District developed thresholds of significance for application within its district boundary. Its efficiency metric of 4.9 MT CO_2e is very similar to the threshold identified above for the proposed project and is based on the same general analytical approach.

Subsequent Use of 2020 Threshold of Significance Determination Methodology

The 2020 threshold of significance determination methodology utilized in this EIR applies to the proposed project only. The methodology reflects the County's best, most current effort to identify a threshold of significance in a GHG analysis environment that is in a state of flux. As new information and guidance becomes available from the State, regional, and/or other local agencies, the County's methodology for determining GHG thresholds of significance and the significance of individual project GHG impacts will be subject to change.

8.4 Environmental Impact Analysis

Climate Change as a Cumulative Effect

Global climate change is, as the term indicates, a global phenomenon. Greenhouse gas emissions released into the atmosphere from a variety of human activities and natural processes that occur across the globe are contributing to global warming. While the U.S. emits the largest per capita volume of GHGs of any country in the world, other major countries (China is the largest total GHG contributor due to its population of nearly 1.4 billion and intensive industrialization efforts in recent decades) contribute substantial volumes of emissions that continue to grow on a per capita basis. Because climate change is a global phenomenon, it is highly unlikely that any one development project located anywhere in the world would have a significant individual impact on climate change. It is the sum total of contributions of development around the world that contribute to the problem. Hence, global climate change is inherently a cumulative effect.

The individual contribution of a project to GHGs in the atmosphere can generally be quantified in terms of the volume of greenhouse gas emissions that it generates. However, it is challenging to identify the precise indirect effects of that contribution at a very local scale due to the complexity of local, regional, and global atmospheric dynamics and to the broad scale at which global warming impacts, such as sea level rise, increases in extreme weather events, decrease in snowpack, etc. are known to occur.

Construction Emissions Estimate

Appendix C, Section 2.1, Overall Construction, Unmitigated Construction, shows the GHG emissions from project construction activities. Total construction emissions are projected at 682.52 MT CO_2e. Total construction emissions are amortized over a 30-year period and

added to the annual operational GHG emissions, discussed below, to arrive at a total annual GHG emissions volume. Based on total construction emissions of 682.52 MT CO_2e, the proposed project would generate construction emissions of about 22.75 MT CO_2e per year over 30 years. CalEEMod defaults have been used for the number and types of construction equipment to be utilized during the construction process and for other construction emissions because more project specific data is not available. No construction GHG mitigation measures were assumed.

Annual Unmitigated 2020 Operational Emissions Projection

Table 8-4, Unmitigated 2020 Operational Phase GHG Emissions, presented below shows a projected annual operational emissions volume of approximately 611.27 MT CO_2e for the year 2020. The unmitigated emissions volume is taken from Appendix C, Section 2.1, Overall Operational, Unmitigated Operational.

Table 8-4 Unmitigated 2020 Operational Phase GHG Emissions (MT/year)

Emissions Source	CO_2e
Area Source	1.82
Energy	231.64
Mobile Source	329.00
Waste	24.29
Water	24.53
Total	611.27[1]

SOURCE: CalEEMod, EMC Planning Group 2017

NOTE: [1]. Total difference relative to volume reported may vary due to rounding

When the amortized construction emissions (22.75 MT) are added to the annual unmitigated 2020 operational phase GHG emissions (611.27 MT) the total emissions attributable to the project are 634.02 MT per year. CalEEMod incorporates GHG emissions reductions that accrue from two key state legislative programs - the Pavley standards and Low Carbon Fuel Standard, as described in the Regulatory Setting section above. GHG emissions reductions will also result statewide from implementation of other state legislation and regulations enacted to implement the 2008 and 2014 CARB Scoping Plans. These reductions are beyond the control of the applicant, but GHG emissions from operation of the project would be reduced as a result. Therefore, the projected annual emissions volume of 634.02 MT is conservative; the total annual volume would likely be lower.

For the purposes of the GHG analysis, the service population is the sum of the resident population and number of employees. For the proposed project, an assisted living senior

community, the resident population cannot be assumed to be equivalent to the number of beds (or 142) as the vehicle trip generation for the residents of an assisted living community is far less than that of a typical residential project. Many residents of the proposed project will not own vehicles and the residents who do will make fewer daily trips.

The proposed project includes 13 casitas structures providing 26 individual units with a total of 42 beds. Casitas residents may maintain a moderate level of independence in their life style, including driving their own vehicles. Accordingly, dedicated parking is provided for each casita. Vehicle trips are assumed for the facility's remaining 100 beds, though at a rate appropriately lower than the rate assumed for single or multi-family residential uses. The Institute of Transportation Engineers (ITE) trip rate for Nursing Homes is 2.74 per bed and the ITE trip rate for Assisted Living is 2.66 per bed; both of these rates are more representative of the actual trip generation for the 100 beds serving assisted living and memory care individuals. By comparison, these rates are approximately one-fourth of the trip rate for a single-family home as identified by the Institute of Transportation Engineers.

As such, for GHG analysis purposes, the resident population for this project is conservatively assumed to be the sum of all the casita beds (42) plus approximately one-quarter of the remaining 100 beds (25). Thus, the total resident population would be 67. The proposed project is projected to create 92 jobs at maximum capacity. Therefore, the service population is 159 (67 residents plus 92 employees). The 2020 GHG efficiency metric for the proposed project is 3.99 MT CO_2e/service population (634.02 MT/159). This is below the threshold of significance of 4.88 MT CO_2e/service population. Consequently, the proposed project would have a less-than-significant impact from generation of GHG emissions and no mitigation measures are required.

AB 32 – the Applicable GHG Reduction Plan

The proposed project would conflict with AB 32, the applicable plan for reducing GHGs, if the GHG emissions it generates interfere with the State's ability to achieve GHG emissions reduction targets set forth in the Scoping Plan for the 2020 target year. As described in the Standards of Significance section, above, the thresholds of significance developed for the proposed project are designed to determine whether project emissions would exceed 2020 emissions reductions goals in the Scoping Plan for 2020. Project emissions would be below the threshold for 2020. Therefore, the proposed would not conflict with AB 32.

8.5 IMPACT SUMMARY AND MITIGATION MEASURES

IMPACT Generation of 634.02 Metric Tons (MT) of Carbon Dioxide Equivalent (CO_2e) per Year (Less than Significant)

The 2020 GHG efficiency metric for the proposed project is 3.99 MT CO_2e per service population (634.02 MT/160). This is 18 percent below the threshold of significance of 4.88 MT CO_2e per service population. Therefore, the proposed project would have a less-than-significant impact from generation of GHG emissions. No mitigation measures are required.

TABLE OF CONTENTS

9.0 TRANSPORTATION & TRAFFIC 9-1

9.1 Environmental Setting 9-1

9.2 Regulatory Setting 9-4

9.3 Thresholds or Standards of Significance 9-9

9.4 Environmental Impact Analysis 9-11

9.5 Impact Summary and Mitigation Measures 9-23

Figures

Figure 9-1 Project Trip Distribution 9-13

Figure 9-2 Project Trip Generation 9-15

Figure 9-3 AM & PM Peak Hour Volumes and Project Trip Assignment 9-17

Figure 9-4 Intersection Levels of Service 9-19

Tables

Table 9-1 Existing and Existing Plus Project Traffic Volumes 9-22

9.0
Transportation & Traffic

This section of the draft EIR addresses the project's effects on transportation and traffic in the vicinity of the project site. The discussion in this section is based upon site investigation, information found in the *County of Monterey General Plan*, *Toro Area Plan*, the *Las Palmas Ranch Specific Plan,* and traffic impact analysis prepared for the proposed project by Keith Higgins, included as Appendix D.

During the NOP review period, members of the public questioned potential impacts of the proposed project on the local transportation network. Additionally, comments on the NOP were received from the California Department of Transportation (Caltrans). Comments from Caltrans include suggesting the draft EIR consider the proposed project's multimodal travel demand and that traffic impact analysis for the project should include information on exiting traffic volumes in the study area and be based on traffic volumes which are less than two years old. The NOP and comment letters are included in Appendix B.

9.1 Environmental Setting

Existing Roadway Network

The key roadways in the vicinity of the proposed project include State Route 68 (Highway 68), Reservation Road, and River Road. These facilities are described below.

State Route (SR) 68 connects SR 1 in Monterey and U.S. Highway 101 in Salinas. It is a two-lane rural highway with a speed limit of 55 mph between SR 1 and just south of the Portola Drive interchange. SR 68 is a four-lane freeway with 65 mph speed limit between the Portola Drive and Spreckels Boulevard interchanges. SR 68 is a four-lane divided highway with 55 mph speed limit from the Spreckels Boulevard interchange to Blanco Road in the City of Salinas. Once inside the City of Salinas, SR 68 becomes an arterial along South Main Street and John Street. It serves as a commuter route between Salinas and the Monterey Peninsula, and functions as a scenic tourist route to the Monterey Peninsula.

Reservation Road is a two-lane rural road that connects SR 68 to the City of Marina. South of SR 68, Reservation Road becomes River Road, which is a four-lane road from the SR 68/Reservation Road interchange to Las Palmas Road. It narrows to two lanes just east of Las Palmas Road. The River Road/Las Palmas Road and River Road/Las Palmas Parkway

intersections are signalized intersections. River Road provides access to residential neighborhoods. The SR 68 ramp intersections with Reservation Road and River Road are signalized.

Existing Conditions Intersections Operations

Weekday AM and PM peak hour turning movement counts at the study intersections were conducted in March and May 2017. The counts were reviewed and, where appropriate, balanced between intersections. The existing conditions peak hour traffic volumes are raw traffic data are presented in the project's traffic impact analysis. The project's traffic impact analysis is included as Appendix D.

The traffic modeling software program Synchro 9 was utilized to evaluate existing conditions operational levels of service at the study intersections. The analysis was performed for the weekday AM and PM peak hours using Highway Capacity Manual 2010 (HCM 2010) methodologies (Higgins 2017).

The following intersections were studied in the traffic impact analysis:

- Reservation Road/SR 68 Westbound Ramps;
- River Road/SR 68 Eastbound Ramps; and
- River Road/Las Palmas Road.

The project's traffic impact analysis found that all the study intersections operate at acceptable levels of service under existing conditions. Existing levels of service are presented in Figure 9-4, Intersection Levels of Service, later in this section. LOS calculation worksheets are included in the project's traffic impact analysis (Higgins 2017).

Existing Conditions Road Segment Operations

The following road segment was studied in the traffic impact analysis: SR 68 between San Benancio Road and Toro Park Interchange

River Road operated in 2008 as LOS C with an average daily traffic (ADT) of 14,850 between SR 68 and Las Palmas Road and LOS D from Las Palmas Road to Las Palmas Parkway with an average ADT of 11,750 (Monterey County 2010). In 2016, the River Road segment between SR 68 and Las Palmas Road operated at LOS C with an ADT of 14,100, and the River Road segment between Las Palmas Road and Las Palmas Parkway operated at LOS D with an ADT of 13,000 (Monterey County 2016).

Daily traffic recorded volumes in 2016 are not significantly different to 2008 volumes and the levels of service for both segments of River Road remain unchanged. Evening peak hour traffic volumes counted in 2017 for the proposed project's traffic analysis totaled 1,492 north of Las Palmas Road and 1,367 south of Las Palmas Road. Evening peak hour volumes

generally represent approximately 10 percent of the daily total. Therefore, these counts are consistent with the 2016 daily volumes. Therefore, it can be deduced that River Road operates at LOS C between SR 68 and Las Palmas Road and LOS D between Las Palmas Road and Las Palmas Parkway. These are considered to be acceptable levels of service (Higgins 2017).

In 2008, SR 68 operated at LOS F and continues to operate at LOS based on current traffic rates (Monterey County 2016). The Transportation Agency for Monterey County (TAMC), Caltrans, and the County of Monterey are currently conducting a corridor study to investigate improvements to SR 68, including roundabouts at currently signalized intersections.

Existing Transit Service

The primary public transit service in the County of Monterey is the bus service provided by Monterey-Salinas Transit (MST). MST focuses on improving operational conditions through established bus routes and schedules that efficiently meet travel demands, reduce travel times, improve service reliability, and encourage bike-and-ride initiatives. All MST buses are wheelchair accessible and equipped with bike racks. In the vicinity of the project site, bus routes are provided along SR 68. There are no MST bus routes provided along River Road.

Existing Bicycle Facilities

The County of Monterey has an adopted bikeway plan designating routes along roadways that can be used by commuters and recreational riders for safe access to major employers, shopping centers, and schools. Three basic types of bicycle facilities are described below:

- Bike path (Class I) - A completely separate right-of-way designed for the exclusive use of cyclists and pedestrians, with minimal crossings for motorists.
- Bike lane (Class II) - A lane on a regular roadway, separated from the motorized vehicle right-of-way by paint striping, designated for the exclusive or semi-exclusive use of bicycles. Bike lanes allow one-way bike travel. Through travel by motor vehicles or pedestrians is prohibited, but crossing by pedestrians and motorists is permitted.
- Bike route (Class III) - Provides shared use of the roadway with motorists, designated by signs or permanent markings.

SR 68 and River Road are designated as Cross County Bike Routes on the 2016 Monterey County Bike Map. Both have shoulders that function as bike lanes.

Existing Pedestrian Facilities

There are no pedestrian facilities on SR 68, Reservation Road, or River Road. Pedestrian facilities are provided within the Las Palmas Ranch development along internal roadways.

9.2 REGULATORY SETTING

State

California Department of Transportation

Caltrans is responsible for state highways and associated highway ramps and for intersections where freeway ramps intersect the local street system. Caltrans generally strives to maintain LOS D on its facilities, but recognizes that circumstances may limit their ability to do so. Caltrans has jurisdiction over the operations of SR 68 in the vicinity of the project site.

Local Plans and Regulations

Regional Transportation Plan

TAMC is responsible for preparing the regional transportation plan (RTP) for Monterey County. The RTP includes policy guidance, plans, and programs to attain a balanced comprehensive, multimodal transportation system; proposed solutions to transportation issues; addresses all modes of travel; and, identifies anticipated funding for projects and programs. Goals of the RTP are embedded in the Association of Monterey Bay Area Government's *2035 Metropolitan Transportation Plan/Sustainable Communities Strategy* (MTP/SC) and regional transportation plans for Monterey, San Benito, and Santa Cruz counties.

The Association of Monterey Bay Area Governments (AMBAG) as the federally-designated metropolitan planning organization representing Monterey, San Benito and Santa Cruz counties, is required by both federal and state law to prepare a long-range (at least 20 years) transportation planning document known as a metropolitan transportation plan. The metropolitan transportation plan contains a compilation of the projects proposed in the RTPs prepared by the Council of San Benito County Governments, the Santa Cruz County Regional Transportation Commission and TAMC. The metropolitan transportation plan is a document used to achieve a coordinated and balanced regional transportation system. The objective of the RTP and the MTP/SCS is to comply with current California Transportation Commission regional transportation plan guidelines.

Monterey County General Plan

The Monterey County General Plan Circulation Element provides policy direction for the transportation systems that serve the unincorporated lands of Monterey County, including roadways that could be affected by the proposed project. The element describes how the county intends to serve transportation needs for the next 20 years as the county's population grows. It identifies the general location and extent of existing and proposed major transportation facilities for vehicle, rail, air, water, and bicycle transportation including goals

relative to: major roadways, movement of people and goods, scenic highways, and public transit. Policies from the element that generally apply to consideration of impacts of the proposed project on county roadway facilities include:

> **Policy C-1.1**: The acceptable level of service for County roads and intersections shall be Level of Service (LOS) D, except as follows:
>
> a. Acceptable level of service for County roads in Community Areas may be reduced below LOS D through the Community Plan process.
>
> b. County roads operating at LOS D or below at the time of adopting this General Plan shall not be allowed to be degraded further except in Community Areas where a lower LOS may be approved through the Community Plan process.
>
> c. Area Plans prepared for County Planning Areas may establish an acceptable level of service for County roads other than LOS D. The benefits which justify less than LOS D shall be identified in the Area Plan. Where an Area Plan does not establish a separate LOS, the standard LOS D shall apply.
>
> **Policy C-1.2:** The goal of achieving the level of service noted in Policy C-1.1 is to be pursued through a combination of:
>
> a. Expenditures from available funds out of the County Road Fund;
>
> b. Circulation improvements that mitigate direct on site and off site development project impacts (see Policy C-1.3);
>
> c. Development and adoption of a Traffic Impact Fee (TIF) as part of a Capital Improvement and Financing Plan (CIFP) to:
>
> 1. Identify and prioritize the improvements to be completed in the benefit areas over the life of the General Plan;
>
> 2. Ensure a funding mechanism for transportation improvements to county facilities in accordance with Policy C-1.8; and
>
> 3. Categorize transportation projects as "high," "medium," or "low" priority.
>
> d. Coordination with all adopted transportation improvement programs within the County of Monterey including but not limited to TAMC, FORA, and cities.
>
> CIFPs shall be developed pursuant to Policy PS-I. Construction costs and land values shall be adjusted annually and the CIFP

shall be reviewed every five (5) years in order to evaluate the effectiveness of meeting the LOS standard for County roads. Road segments or intersections identified to be below LOS D shall be a high priority for funding.

Policy C-1.3: Circulation improvements that mitigate Traffic Tier 1 direct on-site and off-site project impacts shall be constructed concurrently (as defined in subparagraph (a) only of the definition for "concurrency") with new development. Off-site circulation improvements that mitigate Traffic Tier 2 or Traffic Tier 3 impacts either shall:

a. be constructed concurrently with new development, or

b. a fair share payment pursuant to Policy C-1.8 (County Traffic Impact Fee), Policy C-1.11 (Regional Development Impact Fee), and /or other applicable traffic fee programs shall be made at the discretion of the County.

Note: Tier 1 means impacts that are direct impacts on site, or off-site, but in the immediate vicinity of the project.

Tier 2 means direct or cumulative impacts to county roadways not in the immediate vicinity of development.

Tier 3 means impacts to regional roadways and highways identified in the TAMC Regional Development Impact Fee Program.

Policy C-1.4: Not withstanding Policy C-1.3, projects that are found to result in reducing a County road below the acceptable LOS standard shall not be allowed to proceed unless the construction of the development and its associated improvements are phased in a manner that will maintain the acceptable LOS for all affected County roads. Where the LOS of a County road impacted by a specific project currently operates below LOS D and is listed on the CIFP as a high priority, Policy C-1.3 shall apply. Where the LOS of a County road impacted by a specific project currently operates below LOS D and is not listed on the CIFP as a high priority, development shall mitigate project impacts concurrently. The following are exempt from this Policy except that they shall be required to pay any applicable fair share fee pursuant to Policies C-1.8, C-1.11, and /or other applicable traffic fee programs:

a. first single family dwelling on a lot of record;

b. allowable non-habitable accessory structures on an existing lot of record;

c. accessory units consistent with other policies and State Second Unit Housing law;

d. Any use in a non-residential designation for which a discretionary permit is not required or for which the traffic generated is equivalent to no more than that generated by a single family residence (10 ADT); and

e. Minimal use on a vacant lot in a non-residential designation sufficient to enable the owner to derive some economically viable use of the parcel.

Policy C-1.11 In addition to the County Traffic Impact Fee established in Policy C-1.8, the County shall require new development to pay a Regional Traffic Impact Fee developed collaboratively between TAMC, the County, and other local and state agencies to ensure a funding mechanism for regional transportation improvements mitigating Traffic Tier 3 impacts.

Countywide Traffic Impact Fee Programs

TAMC Fee and Sales Tax Revenue Measure

TAMC and its member jurisdictions have adopted a county-wide, regional impact fee to cover the costs for studies and construction of many improvements throughout Monterey County. This impact fee, which went into effect on August 27, 2008, is applied to all new development within Monterey County. The governing document for the fee is the *Regional Development Impact Fee Program Nexus Study Update* (Wood Rodgers 2013).

In November, 2016 Monterey County voters approved Measure X, the Transportation Safety & Investment Plan, a 30-year sales tax measure to fund a broad range of transportation improvements. Fifty million dollars has been earmarked for SR 68 improvements for congestion relief and safety improvements. TAMC is currently conducting corridor studies to identify improvement options and to focus on options that will provide the most significant benefits to residents and the travelling public (http://www.tamcmonterey.org/measure-x/programs-projects/). In addition, the TAMC regional development impact fee designates an additional four million dollars toward these improvements.

To date, a county-wide traffic fee program has yet to be adopted. However, the county has been assessing fees for the countywide traffic impact fee on an ad hoc basis per the fee program's draft fee schedule (Higgins 2017).

Toro Area Plan

The following supplemental policy included in the Toro Area Plan is applicable to the proposed project:

Policy 41.2.1.1(T) If new sites for office employment, services, and local conveniences are found to be appropriate, such sites should incorporate designs to allow use of alternate modes of transportation.

Las Palmas Ranch Specific Plan

The following circulation policies included within the Las Palmas Ranch Specific Plan generally apply to consideration of impacts of the proposed project:

Policy 3 Adequate off-street parking should be provided as a means of reducing road congestion, particularly in areas where reduced road right-of-way is proposed.

Policy 4 Turnouts and turnaround facilities may be required to accommodate emergency vehicles in areas of reduced right-of-way or where longer cul-de-sacs are proposed.

Policy 5 Interior roads shall have longitudinal grades not exceeding 15 percent.

Policy 7 The internal circulation system should be designed to accommodate a level of service "C" at full buildout. A trip generation factor of 8.0 trips per day per unit shall be used for this project.

Policy 8 The use of optional design and improvement standards is encouraged for the internal road system to reduce visual impacts, maintain a rural character and enhance the liveability, convenience and appearance of the project. Subject to specific review in each case, such optional standards shall permit extended cul-de-sac length and elimination or reduction of curbs and sidewalks, and may permit reduce right-of-way.

Policy 9 Roads which area perpendicular to viewing areas of which involve excessive cut and fill shall be discouraged.

Policy 10 Horizontal and vertical street alignments should relate to the natural contour of the site insofar as practical, while retaining safe sight distance for expected driving speeds but not less than 25 mph.

Policy 13 Access to the development will be by public road intersections including left turn channelizations constructed by the developer on River Road at the entrances to the subdivision. Design and construction shall be compatible with the widening of River Road.

> **Policy 14** Internal road connections should be provided where feasible between the areas of the subdivision in order to minimize the need for River Road to provide a route for intra-subdivision traffic.

Traffic Mitigations Previously Implemented for Las Palmas Ranch

The overall traffic impacts of the Las Palmas development were analyzed and addressed through the specific plan and its EIR. The specific plan EIR assessed traffic impacts for an upper and lower number of units and recommended mitigations accordingly. The Monterey County Board of Supervisors, in adopting the specific plan, approved a number of units midway between the high and low numbers analyzed, but required the mitigation measures for the larger project. The specific plan prescribed specific traffic mitigations, including payment of fees to a County fund to expand River Road to four lanes, for improvements to the River Road/Highway 68 intersection and for other local improvements. In later phases of the construction of Las Palmas Ranch, the developers, with the approval of the County, built all of the required improvements.

Those mitigations were based on traffic estimates developed in the specific plan EIR and documented in the specific plan and through conditions of project approvals. To assess the potential impacts of the proposed project, the project's traffic analysis preparer reviewed the specific plan EIR, specific plan, previous project conditions of approval, improvements that were constructed, and conducted traffic counts from all of the Las Palmas Ranch entrance points. The proposed project's analysis concluded:

1. The estimated trip generation for the Las Palmas Ranch development is 11,721 trips per day (LPRSP EIR).
2. Based on actual traffic counts, Las Palmas Ranch is generating on average 7,646 external trips per day (65% of projected).
3. The proposed project is estimated to add 363 external trips per day.
4. The cumulative traffic generation (existing plus project) is 8,009 trips per day (68% of projected), 3,712 trips less per day that originally estimated for Las Palmas Ranch.
5. All of the traffic improvements prescribed for Las Palmas Ranch to mitigate its impacts on River Road and Highway 68 have been completed.

9.3 THRESHOLDS OR STANDARDS OF SIGNIFICANCE

CEQA Guidelines appendix G indicates that a project may have a significant effect on the environment if it would:

- conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and

relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;

- conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
- substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- result in inadequate emergency access;
- result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; or
- conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Caltrans Definitions of Significant Traffic Impacts

Signalized Intersections

Caltrans defines an acceptable level of service for signalized intersections as LOS C/D (on the "cusp" or the transition between LOS C and LOS D). The project is said to create a significant adverse impact on traffic conditions at a signalized intersection under Caltrans' jurisdiction if:

- The level of service at the signalized intersection degrades from an acceptable LOS C/D threshold or better under background conditions to an unacceptable LOS D or worse under background plus project conditions, or
- The project would add traffic to a signalized intersection already operating at LOS D or worse.
- A significant impact is satisfactorily mitigated when measures are implemented that would restore intersection level of service to better than background conditions.

Freeway Impacts

Caltrans defines an acceptable level of service for freeway segments as LOS C or better. A significant adverse impact on traffic conditions would occur on a freeway segment if for either peak hour:

- The level of service on the freeway segment degrades from an acceptable LOS C or better under baseline conditions to an unacceptable LOS D or worse under project conditions; or

- New trips are added to a facility already operating at an unacceptable LOS D or worse under baseline conditions.
- A significant impact is satisfactorily mitigated when measures are implemented that would restore freeway conditions to better than background conditions.

Monterey County Definitions of Significant Traffic Impacts

Monterey County considers a project to have a significant impact on county roads if it would:

- Degrade a signalized intersection to below LOS C or diminish the volume to capacity ratio of an intersection already operating below LOS D and E by 0.01 or more, or any vehicles to an intersection already operating at LOS F;
- Degrade any traffic movement at an unsignalized intersection to LOS F, or cause any traffic signal warrant to be met;
- Degrade roadway segments operating at LOS A through E to a lower LOS of D, E, or F; and/or
- Add any trips to a roadway segment already operation at LOS F.

9.4 Environmental Impact Analysis

Project Trip Generation

The project is proposed to include 26 assisted living units (casitas), which are expected to have a traffic generation rate similar to typical attached senior housing units. It is also proposed to include 52 beds of assisted care and 48 beds of memory care (for traffic generation purposes, similar to a nursing home). In total, the project is expected to generate approximately 363 daily trips with 22 trips during the morning peak hour and 33 trips during the evening peak hour. This assumes the project operates with peak hour trip generation characteristics similar to a standard project with this mix of senior living uses (Higgins 2017). The project trip generation estimate is summarized in Figure 9-1, Project Trip Distribution.

The project is expected to employ about 93 staff members over a 24-hour period. The shift changes that are most relevant to project traffic impacts are those that occur near the peak hour of the street and highway system.

As a means of reducing peak hour trip generation, the project proposes to have shift changes occur outside peak travel periods, that is, during the hours of 7am to 9am and 4pm to 6pm. Morning shifts A and B, day shift B and the evening and night shifts all will change outside the two-hour street peak periods.

Rescheduling the day shift A schedule to begin and end outside the street peak period would eliminate 12 inbound trips in the morning peak hour (from day shift A) and 12 outbound trips during the evening peak hour. This would result in a net total of 10 morning street peak hour trips and 21 evening street peak hour trips.

Project Trip Distribution and Assignment

The project's trip distribution based on existing traffic patterns in the study area is shown graphically in Figure 9-2, Project Trip Generation. Project trip assignments at the study intersections are shown in Figure 9-3, AM & PM Peak Hour Volumes and Project Trip Assignment. The project would add about one AM peak hour trip and four PM peak hour trips to the two-lane section of SR 68 immediately west of the Toro Park interchange. These additional trips would have no impact on traffic flows. Project traffic will dissipate along the SR 68 corridor at the many crossroads including Torero Drive, San Benancio Road, Corral de Tierra Road, and Laureles Grade, resulting in less than one AM peak hour trip and about two PM peak hour trips west of Laureles Grade. Project traffic would be at or below one peak hour trip west of SR 218 (Higgins 2017).

Existing Plus Project Traffic Volumes

The project trip assignments were added to the existing traffic volumes to obtain estimated existing plus project traffic volumes. Existing plus project traffic volumes for the AM and PM peak hours are also presented in Figure 9-3, AM & PM Peak Hour Volumes and Project Trip Assignment.

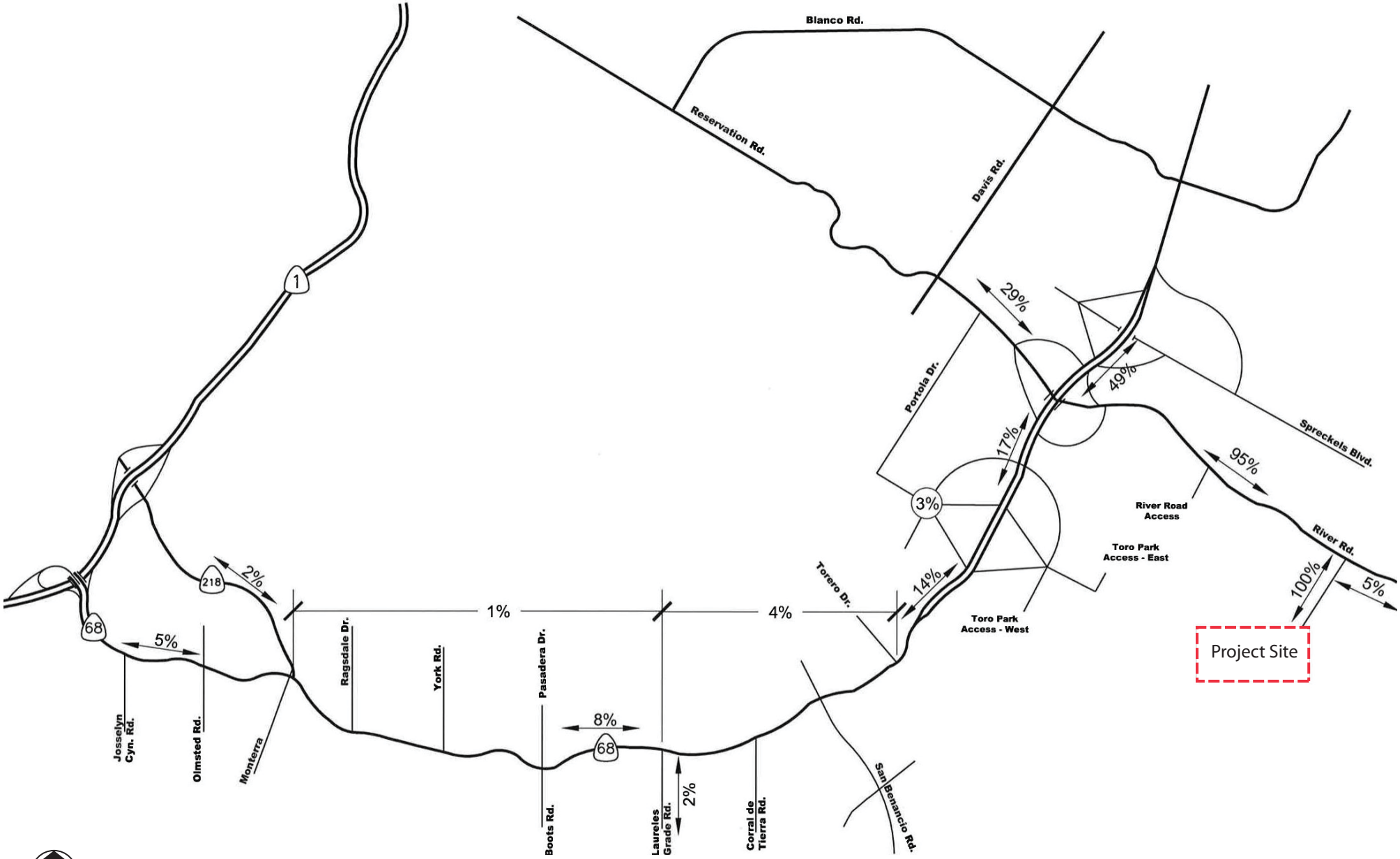
Existing Plus Project Conditions Intersection Conditions

All of the study intersections are projected to operate at acceptable levels of service under existing plus project traffic conditions and no improvements are recommended. Intersection levels of service are summarized in Figure 9-4, Intersection Levels of Service. LOS calculation worksheets are included as an appendix of the project's traffic impact assessment (Appendix D). As concluded in the project's traffic impact assessment, all project impacts at study intersections would be insignificant (Higgins 2017).

Existing Plus Project Conditions Road Segment Operations

The project would have no effect on the level of service of River Road between SR 68 and Las Palmas Parkway and would have no effect on SR 68 traffic operations. However, SR 68 currently operates at LOS F. Monterey County and Caltrans consider the addition of a single peak hour trip to be a significant impact. Therefore, although the added trips would be insignificant in proportion to existing traffic volumes, the project would have, as determined by Monterey

County and Caltrans, a significant impact on the two-lane section of SR 68 between Toro Park and SR 218.



Project Site

Source: Keith Higgins 2017

Figure 9-1
Project Trip Distribution

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TRIP GENERATION RATES[1]	ITE Land Use Code	Daily Trip Rate	AM Peak Hour				PM Peak Hour			
			Peak Hour Rate	% of ADT	% In	% Out	Peak Hour Rate	% of ADT	% In	% Out
Senior Housing - Detached (per unit)	251	3.68	0.22	6%	35%	65%	0.27	7%	61%	39%
Senior Housing - Attached (per unit)	252	3.44	0.2	6%	34%	66%	0.25	7%	54%	46%
Assisted Living (per bed)	254	2.74	0.18	7%	68%	32%	0.29	11%	50%	50%
Nursing Home (per bed)	620	2.74	0.17	6%	69%	31%	0.22	8%	33%	67%

GENERATED TRIPS	Project Size	Daily Trips	Peak Hour Trips	% of ADT	Trips Inbound	Trips Outbound	Peak Hour Trips	% of ADT	Trips Inbound	Trips Outbound
PROPOSED PROJECT (Revised Project)										
Senior Housing - Detached	0 Units	0	0	-	0	0	0	-	0	0
Senior Housing - Attached (Casitas)	26 Units	89	5	6%	2	3	7	8%	4	3
Assisted Care	52 Beds	142	9	6%	6	3	15	11%	8	7
Memory Care (Nursing Home)	48 Beds	132	8	6%	6	2	11	8%	4	7
Total Using Standard ITE Rates		**363**	**22**	**6%**	**14**	**8**	**33**	**9%**	**16**	**17**
Reduction in Peak Hour Traffic by Adjusting Day Shift A Schedule			**12**		**12**	**0**	**12**		**0**	**12**
Total with Adjusted Work Schedules			**10**		**2**	**8**	**21**		**16**	**5**

PROJECT TRAFFIC ASSIGNMENT TO HIGHWAY 68 SEGMENTS	Percent of Total	Total	EB	WB	Total	EB	WB
River Road to Toro Park (4 Lane Section)	17%	1.7	0.3	1.4	3.6	2.7	0.9
Toro Park to Laureles Grade (2 Lane Section)	14%	1.4	0.3	1.1	2.9	2.2	0.7
Laureles Grade to Highway 218 (2 Lane Section)	8%	0.8	0.2	0.6	1.7	1.3	0.4
West of Highway 218 (2 Lane Section)	5%	0.5	0.1	0.4	1.1	0.8	0.3
Highway 218	2%	0.2	0.0	0.2	0.4	0.3	0.1

Notes:

1. Trip generation rates published by Institute of Transportation Engineers, "Trip Generation," 9th Edition, 2012.

Source: Keith Higgins 2017

Figure 9-2
Project Trip Generation

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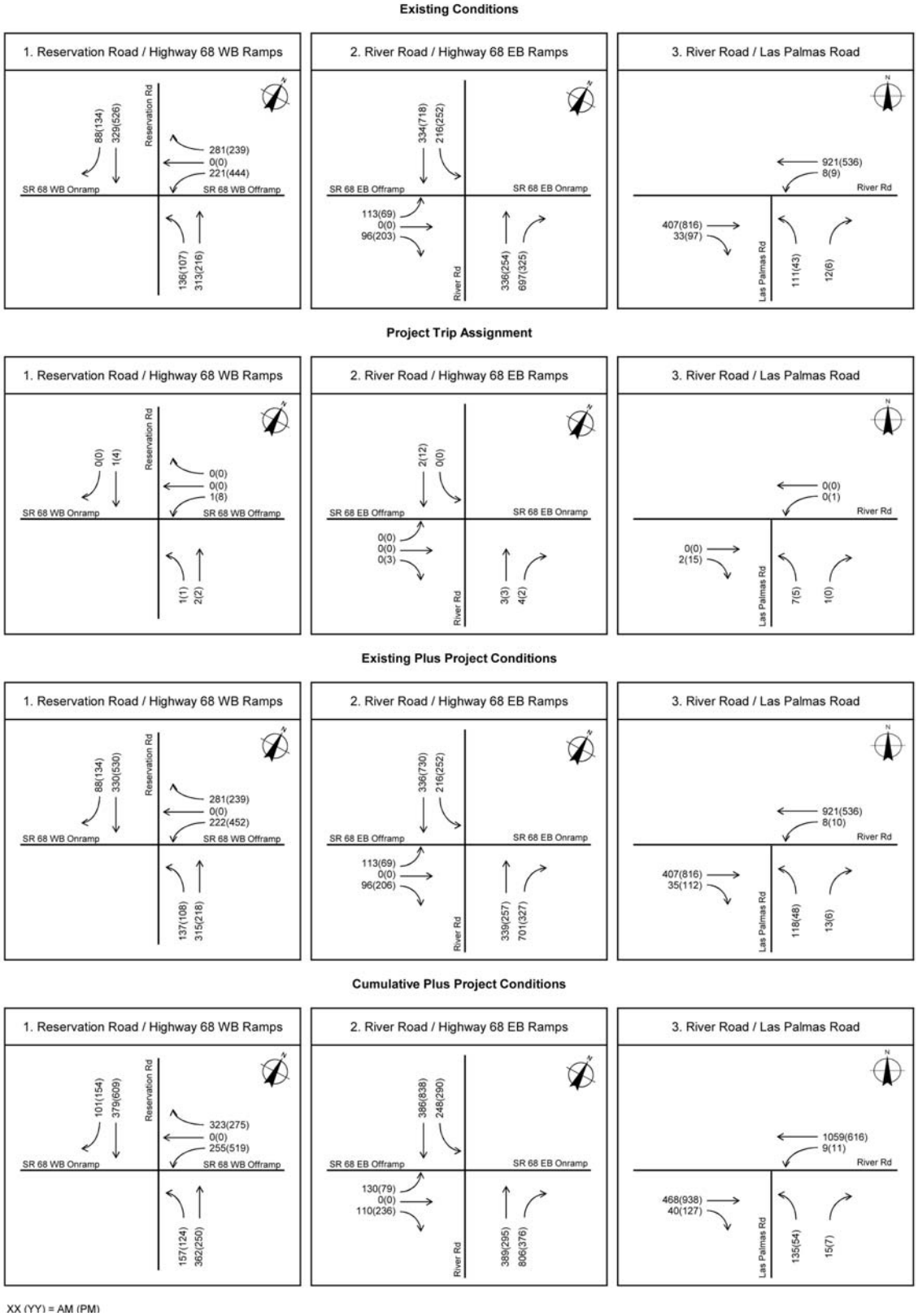

Source: Keith Higgins 2017

Figure 9-3
AM & PM Peak Hour Volumes & Project Trip Assignment

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	N-S Street	E-W Street	Existing Lane Configuration	Existing Intersection Control	LOS Standard	Existing Conditions				Existing + Project Conditions				Cumulative + Project Conditions			
						AM Peak Hr.		PM Peak Hr.		AM Peak Hr.		PM Peak Hr.		AM Peak Hr.		PM Peak Hr.	
						Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS
1	Reservation Road	Highway 68 WB Ramps	NB 1-L, 1-T SB 1-T/R WB 1-L/T, 1-R	Signal	Caltrans C/D	20.3	C	31.3	C	20.3	C	32.0	C	24.6	C	48.7	D
2	River Road	Highway 68 EB Ramps	NB 1-T, 1-R SB 1-L, 1-T EB 1-L/T, 1-R	Signal	Caltrans C/D	26.3	C	14.5	B	26.5	C	14.6	B	42.7	D	17.8	B
3	Las Palmas Road	River Road	NB 1-L, 1-R EB 2-T, 1-R WB 1-L, 2-T	Signal	County D	4.9	A	4.2	A	5.0	A	4.4	A	5.3	A	4.4	A

Notes:

1 L, T, R = Left, Through, Right

2 NB, SB, EB, WB = Northbound, Southbound, Eastbound, Westbound

3 Highlighted levels of service exceed jurisdiction's LOS standard.

Source: Keith Higgins 2017

Figure 9-4

Intersection Levels of Service

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The project would be required to pay a TAMC fee that would represent the project's fair share contribution toward SR 68 improvements and improvements on other regional facilities. In addition, construction and operational phases of the project would contribute monies for the TAMC sales tax over the next 30 years.

Neighborhood Street Analysis

The project site is located at the end extension of Woodridge Court. Woodridge Court connects to River Run Road, which connects to Las Palmas Road and provides access to and from River Road. Woodridge Court and River Run Court are local streets. Las Palmas Road functions as a collector street. Providing access to and from the project site would add vehicle trips to each of these streets.

Las Palmas Road currently carries approximately 164 morning peak hour and 155 evening peak hour trips. Traffic counts conducted in November 2013 indicated that Las Palmas Road between River Road and Winding Creek Road carries approximately 1,837 daily trips. Riverview Court daily traffic totaled 386, for a grand total of 2,223 for the 313 homes in the Las Palmas 1 development. Based on these traffic counts, the daily trip generation rate for the neighborhood is approximately 7.1 trips per day per home (Higgins 2017).

Two lane collector streets are generally held to have a capacity of approximately 10,000 vehicles per day. Las Palmas Road has a width of 40 feet, which corresponds to a secondary street in the Monterey County Standard Details, which assigns a conservative threshold of carrying up to 3,000 vehicles per day. LOS C was the general plan policy in effect at the time of the approval of the Las Palmas Ranch Specific Plan. These thresholds are therefore considered to correspond with LOS C. Assuming this rate applies to all subareas within the La Palmas Ranch development, the daily trip totals for Las Palmas Road between Winding Creek Road and River Run Road is approximately 1,200. This is within 60 percent below the LOS C capacity normally attributable to collector streets, as well as the Monterey County threshold of 3,000 vehicles per day (Higgins 2017).

River Run Road carries approximately 950 vehicles per day between Las Palmas Road and Woodbridge Court. River Run Road is a local street. It has a width of 38 feet, which is about midway between a secondary street (40 feet width) with a LOS C threshold of 3,000 and a tertiary street (34 feet width) with a LOS C threshold of 1,000. This section of street could therefore be considered a hybrid with a LOS C threshold of 2,000 vehicles per day. Functionally, it currently provides the sole access to over 130 homes plus the Corey House and the project site. River Run Road with the build-out of the project site under its original development proposal would be estimated to carry approximately 1,230 to 1,300 vehicles per day (35 percent below the LOS C threshold). On that basis, River Run Road would continue to operate at LOS A-B with implementation of the proposed project (Higgins 2017).

Another consideration for River Run Road is a comparison of anticipated traffic volumes with traffic volume thresholds used by nearby municipalities in neighborhood traffic management and traffic calming policies. Monterey County does not have such a policy, but the City of Salinas adopted the Neighborhood Traffic Management Program. This policy states that if traffic volumes on residential streets are projected to be less than 1,500 vehicles per day, then no action is needed, nor will it be taken.

The City of Salinas Traffic Calming Program states that streets carrying more than 1,600 vehicles per day are eligible for traffic calming. Volumes under 1,600 vehicles per day are within a reasonable level for a residential street. Both the policies indicate that collector streets are not eligible for traffic calming. The anticipated volume of 1,313 vehicles per day on River Run Road is below the threshold for both policies and therefore, would be considered within an acceptable traffic volume for a local residential street (Higgins 2017).

Woodbridge Court currently does not serve any residences. It has a width of 28 feet, which is similar to a county loop street. It carries occasional traffic primarily associated with the Corey House and maintenance vehicles. Woodbridge Court would carry all of the project's traffic, which is expected to total approximately 363 vehicles per day. This street would carry volumes well within acceptable levels for residential streets (Higgins 2017).

Table 9-1, Existing and Existing Plus Project Traffic Volumes below summarizes existing and existing plus project daily traffic volumes along the access route between the project site and River Road.

Table 9-1 Existing and Existing Plus Project Traffic Volumes

Street Segment	Street Classification & LOS C Threshold	Number of Homes Fronting on Street	Existing ADT and LOS	Project ADT	Existing Plus Project ADT/LOS
Las Palmas Rd – River Rd to Winding Creek	Collector/Secondary – 3,000	0	2,223-A	363	2,586-A
Las Palmas Rd – Winding Creek to River Run	Collector/Secondary – 3,000	0	1,200-A	363	1,563-A
River Run Rd – Las Palmas Rd to Woodbridge Court	Local/An Average of Secondary and Tertiary – 2,000	2	950-A	363	1,313-A/B
Woodbridge Court – River Run Road to Project Site	Tertiary - 300	0	0-A	363	363-A

SOURCE: Higgins 2017

NOTE: ADT = average daily trips; LOS = level of service

Two intersections exist along the project's access route to and from SR 68. The Las Palmas Road / River Run Road intersection is a T-intersection that is stop-controlled on the Las Palmas Road approach. Traffic volumes are well within a LOS A on both intersecting streets. The project would add only incrementally to existing volumes and no capacity or traffic control improvements would be currently warranted. The River Run Road / Woodbridge Court intersection has stop control on the River Run Road approach. No capacity or traffic control improvements would be required (Higgins 2017).

Emergency Access

The project's traffic impact assessment concluded that vehicle trip generation associated with the proposed project would be accommodated by the existing neighborhood roadway system. Therefore, implementation of the proposed project would not result in inadequate emergency access to the project site itself, or to residences in the Las Palmas Ranch neighborhood.

Applicant Proposed Mitigation Measures

The following mitigation measure intended to reduce impacts to traffic circulation in the vicinity of the project site has been proposed by the applicant.

1. To reduce peak hour trip generation, specifically on SR 68, all employee shift changes for project site operations shall occur outside of morning and evening peak trip hours. A requirement to schedule all morning, day, and night shifts for project operations outside of peak hours shall be included as a condition of approval associated with the conditional use permit.
2. To reduce overall trip generation to and from the project site, the project developer shall prepare a detailed plan for shuttle service. Shuttle services shall be offered to residents to access areas on the Monterey Peninsula and in Salinas from the project site. Additionally, shuttle service to nearby transportation hubs for employees shall be offered in the shuttle service plan. The shuttle service plan shall be submitted for review and approval to Monterey County prior to approval of any building permits on the project site.

9.5 Impact Summary and Mitigation Measures

IMPACT The Proposed Project Would Add Vehicle Trips to Local Neighborhood Roadways and Intersections (Less than Significant)

The proposed project would add approximately 363 vehicles per day within the neighborhood roadway system between River Road and the project site. Based on existing traffic conditions and the existing capacity of the neighborhood roadway system, the additional vehicle trips associated with the proposed project would have less-than-significant impacts on the neighborhood roadway system.

IMPACT The Proposed Project Would Add Vehicle Trips to the Reservation Road and State Route 68 Westbound Ramp Intersection, River Road and State Route 68 Eastbound Ramp Intersection, and the River Road and Las Palmas Road Intersection (Less than Significant)

All of the project's traffic impact analysis study intersections are projected to operate at acceptable levels of service under existing plus project traffic conditions and no improvements are required. Based on existing traffic conditions and the existing levels of service of the intersections, the additional vehicle trips associated with the proposed project would have less-than-significant impacts on the Reservation Road and SR 68 Westbound Ramp Intersection, the River Road and SR 68 Eastbound Ramp Intersection, and the River Road and Las Palmas Road Intersection.

IMPACT The Proposed Project Would Add Vehicle Trips to the River Road segments from State Route 68 to Las Palmas Road and Las Palmas Road to Las Palmas Parkway (Less than Significant)

The proposed project would add vehicle trips to the road segments of River Road from SR 68 to Las Palmas Road, and from Las Palmas Road to Las Palmas Parkway. Based on existing traffic conditions and the existing capacity of these roadway segments, the additional vehicle trips associated with the proposed project would have less-than-significant impacts on these two roadway segments of River Road.

IMPACT The Proposed Project Would Add Vehicle Trips to State Route 68, which Currently Operates at Level of Service F (Significant and Unavoidable)

The proposed project would add about one AM peak hour trip and four PM peak hour trips to the two-lane section of SR 68 immediately west of the Toro Park interchange. Project traffic will dissipate along the SR 68 corridor at the many crossroads including Torero Drive, San Benancio Road, Corral de Tierra Road, and Laureles Grade, resulting in less than one AM peak hour trip and about two PM peak hour trips west of Laureles Grade. Project traffic would be at or below one peak hour trip west of SR 218. Project-related traffic would not have any effect on SR 68 traffic operations. However, SR 68 currently operates at LOS F and Monterey County and Caltrans consider the addition of a single peak hour trip to be a significant impact when adding to a LOS F situation. Therefore, based on this threshold, the project would have a significant impact on the two-lane section of SR 68 between Toro Park and SR 218. As previously discussed, TAMC, Caltrans, and Monterey County have funding and are studying a variety of operational improvements along the corridor.

There are no mitigation measures available to reduce project-level impacts to a less-than-significant level, based on the Monterey County and Caltrans threshold, because the proposed project would have no effect on traffic operations. However, the project would be required to pay regional traffic impact fees that would serve as some mitigation for impacts

to SR 68. Nevertheless, the project would not be directly implementing any improvements to offset its impacts and will, therefore, have an unmitigated significant impact on SR 68. At this time, it is unknown whether any Caltrans/TAMC improvements to the corridor (e.g., widening and/or roundabouts along the route) would improve the level of service on SR 68.

Furthermore, the applicant has proposed to implement the following mitigation measures, which would reduce impacts to the traffic circulation in the vicinity of the project site.

TRA-1 To reduce peak hour trip generation, specifically on SR 68, all employee shift changes for project site operations shall occur outside of morning and evening peak trip hours. A requirement to schedule all morning, day, and night shifts for project operations outside of peak hours shall be included as a condition of approval associated with the conditional use permit.

TRA-2 To reduce overall trip generation to and from the project site, the project developer shall prepare a detailed plan for shuttle service. Shuttle services shall be offered to residents to access areas on the Monterey Peninsula and in Salinas from the project site. Additionally, shuttle service to nearby transportation hubs for employees shall be offered in the shuttle service plan. The shuttle service plan shall be submitted for review and approval to Monterey County prior to approval of any building permits on the project site.

Implementation of these mitigation measures would reduce impacts to traffic circulation in the vicinity of the project site. However, the mitigation measures would not alter the proposed project's significant and unavoidable impact to SR 68.

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TABLE OF CONTENTS

10.0 WATER SUPPLY 10-1

10.1 Environmental Setting 10-1

10.2 Regulatory Setting 10-7

10.3 Thresholds or Standards of Significance 10-10

10.4 Environmental Impact Analysis 10-11

10.5 Impact Summary and Mitigation Measures 10-13

Figures

No table of figures entries found.

Tables

Table 10-1 River View at Las Palmas Potable Water Demand Estimate[1, 2] ... 10-11

Table 10-2 Projected, Existing, and Proposed Las Palmas Ranch Water Use 10-12

10.0
Water Supply

This section of the Draft EIR addresses the project's effects on water resources, including water demand and supply for the proposed project.

During the Draft EIR's NOP review period, some members of the public questioned the availability of water supply for the proposed project. The county's NOP and comment letters are included in Appendix B.

10.1 Environmental Setting

Water Supply Purveyor

Urban water supply is provided to the Las Palmas Ranch Specific Plan Area by the California Water Service Company (Cal Water). The project site is located within Cal Water's Indian Springs/Salinas Hills/Buena Vista service area. Cal Water has provided a "can and will serve" letter for the proposed project, which is included as Appendix E. Landscape irrigation on the project site associated with the proposed project would use reclaimed water from the Las Palmas Ranch Wastewater Treatment Facility, operated by California American Water. Reclaimed water pipe connections to the treatment facility are already located on the project site.

Cal Water has a total of 28 wells that supply its Salinas service area. The design production capacity of active operational wells is 27,880 gallons per minute (gpm), which is equivalent to 40 million gallons per day (mgd) or 44,843 acre-feet per year (AFY). Cal Water has three new wells being constructed and scheduled to become operational in 2017 and 2018. Well capacities range from 500 gallons per minute (gpm) to 2,000 gpm. It is assumed that the three new wells will have an average design capacity of 1,200 gpm for a total of 3,600 gpm or 5.18 mgd, which is equivalent to 5,812 AFY. Three additional wells are planned within the boundary of the West Area Specific Plan, a project currently being considered by the City of Salinas that is located in the north of Boronda Road Future Growth Area. The design capacity for each of these three wells is 1,200 gpm each. The first of these is scheduled to come online in 2020 (Cal Water 2015).

Recent and Existing Weather Conditions

According to the California Department of Water Resources, California is experiencing record wet conditions following five consecutive years of drought. In 2015, the state had

record low statewide mountain snowpack of only five percent of average. The three driest consecutive years of statewide precipitation in the historical record were in 2012-14. Water year 2017 (October 1, 2016-September 30, 2017) has surpassed the wettest year of record (1982-83) in the Sacramento River and San Joaquin River watersheds and is close to becoming the wettest year in the Tulare Basin (set in 1968-69). Mountain snowpack is already well above the April 1 seasonal averages throughout the Sierra Nevada, with the southern Sierra being more than 200 percent of average for the year to date.

California experiences the most extreme variability in yearly precipitation in the nation. The summary on California Precipitation by the Center for Western Weather and Water Extremes at the Scripps Institution explains how large storms (often atmospheric river storms) contribute to those extreme changes. Water year 2017 has been an active year for atmospheric river storms.

The potential for wide swings in precipitation from one year to the next shows why the state must be prepared for either flood or drought in any year. Although this year may be wet, dry conditions could return again next year. 2017 may be only a wet outlier in an otherwise dry extended period. Unfortunately, the scientific ability to determine if next year will be wet or dry (known as sub-seasonal to seasonal forecasting, or long-range weather forecasting) isn't yet capable of delivering reliable predictions (California Department of Water Resources 2017).

Groundwater Supply, Demand, and Basin Overdraft

There is no available data regarding how the 2016-2017 storms have affected the Salinas Valley Groundwater Basin (groundwater basin). The following discussion is based upon reports prepared prior to the 2016-2017 storms.

Groundwater is currently the dominant source of water supply for agricultural and municipal water demands in the Salinas Valley, as well as all of unincorporated Monterey County. Agricultural water use represents approximately 90 percent of all water used in the Salinas Valley (Brown & Caldwell 2016, pp. 2-4 – 2-5). Urban water supply to Salinas is currently derived exclusively from groundwater. There are no sources of imported water available to augment groundwater supplies within the district or within the groundwater basin. For this reason, the condition of groundwater resources from a supply and demand perspective is important in considering potential effects of increased water demand that would result from development of the proposed project. Due to the growth of urban development and agricultural activities over time, demand for groundwater has increased, resulting in impacts on groundwater availability and quality.

The project site is situated in the foothills at the north-western end of the Salinas Valley, a relatively narrow, elongated, fault down-dropped, sedimentary basin in the California

Central Coast Range. The uplifted mountainous boundary consists of older granitic, metamorphic and marine sedimentary rocks of the Salinian tectonic block. Beneath the valley, a thick sequence of Tertiary marine sedimentary rocks is overlain by late Tertiary to Recent non-marine sedimentary deposits of fluvial and alluvial fan origin. The uppermost 1,000 feet, or more, of this non-marine sequence contains the fresh ground-water basin that is utilized for various water supply purposes.

Cal Water extracts groundwater from two hydraulically connected sub-basins of the groundwater basin known as the Pressure Subarea and the East Side Subarea. Much of the water supply for the Salinas area is extracted from the Pressure Subarea. The Pressure Area is a region of gradually declining groundwater elevations and is characterized by three confined aquifer systems, overlain and separated by thick clay layers that act as aquicludes. These aquifers named for their relative depths are known as the “180-foot", the “400-foot”, and “900-foot” aquifers. The groundwater level in the East Side Area is declining more rapidly than any other area in the groundwater basin. The East Side Area is comprised of unconfined, randomly scattered water bearing strata (Yarne & Associates 2016).

As described in Cal Water’s 2015 Urban Water Management Plan (UWMP), the groundwater basin was in an overdraft condition at the time the UWMP was adopted. The state has designated the 180-foot and 400-foot aquifers as critically over-drafted. While the basin remains unadjudicated, the California Department of Water Resources has listed the groundwater basin as a high priority. The main concern of the overdraft is not water level, but rather seawater intrusion into these two aquifers. Seawater intrusion threatens the quality of water extracted from the aquifers.

The UWMP notes the annual non-drought overdraft of the groundwater basin is approximately 45,300 AFY. Because of the hydrologic continuity between the ocean and the aquifers of the Pressure Area, seawater has been intruding into these aquifers at a rate of approximately 28,800 AFY. During droughts, the annual overdraft can escalate to between 150,000 and 300,000 AFY per year.

Refined data on the imbalance of the groundwater basin can be found in the Brown & Caldwell’s State of the Salinas River Groundwater Basin. That report investigates conditions in “Zone 2C” of the groundwater basin. Zone 2C is comprised of seven of the sub-basins within the groundwater basin. The report further focuses on the four water-producing subareas, including the Pressure Subarea and the East Side Subarea, that produce nearly all of the reported groundwater use within Zone 2C. The report states that the basin appears to be out of hydrologic balance. The average annual groundwater extraction for the four noted subareas that compose Zone 2C was about 523,000 AFY from 1959 to 2013. The average annual change in storage was about 17,000 to 24,000 AFY, including seawater intrusion. Based on the continued large storage declines in the East Side and Pressure Subareas (and

resulting groundwater declines and seawater intrusion), the current distribution of groundwater extractions is not sustainable. Seawater intrusion can account for up to 18,000 AFY of the total storage loss of 24,000 AFY. It is stated that sustainable use of groundwater can only be achieved by aggressive and cooperative water resources planning to mitigate seawater intrusion and groundwater head declines (Brown & Caldwell 2015, p. ES-16). Brown & Caldwell note three possible options for reducing seawater intrusion impacts. These include: 1) reducing pumping in the Pressure and East Side subareas; 2) shifting pumping to areas farther away from the coast as long as it is shifted to areas far enough inland; and 3) shifting pumping from the 180-foot and 400-foot aquifers to the deep 900-foot aquifer. Regarding the latter, it is uncertain whether this is a viable option given lack of information about connectivity between the three aquifers and whether pumping in the 900-foot aquifer would lead to the onset of regional seawater intrusion (Brown & Caldwell 2015, pp. 6-3 – 6-4).

Intruding seawater has advanced into the 180-foot aquifer to within one mile of Cal Water's closest well. Cal Water has shifted production as much as possible out of the 180-foot and East Side aquifers and located it further south and more in the 400-foot aquifer of the Pressure area. Cal Water does not pump from the 900-foot aquifer. No change was observed in the location of the intrusion contours between the years 2011 and 2013, the most recent year for which analysis is available. It is possible that the first two years of the current drought did not have an apparent effect on the movement of the seawater intrusion front (Brown & Caldwell 2015, p. ES-13).

Current/Planned Water Projects to Reduce Groundwater Overdraft

Seawater intrusion into the Salinas Valley Groundwater Basin has been a problem for many years. A solution was identified as early as 1946 when the State of California proposed a three-part remedy:

- Construct several large reservoirs to capture excess storm flow on the upper reaches of the Salinas River and its tributaries;
- Recharge groundwater in the upper valley and Forebay sub-areas of the Salinas Valley with the captured runoff; and
- Extract portions of the augmented groundwater and transmit it via a conveyance system to the East Side and Pressure sub-areas of the basin so that the water users in this northern-most region of the valley can reduce their use of groundwater.

The first two parts of this solution have been constructed and are in operation. Nacimiento and San Antonio reservoirs were built and are operated by the Monterey County Water Resources Agency. The water that they capture is released in a controlled manner to recharge the aquifers in the upper and forebay areas through the natural riverbeds. The final part of the solution however, has not been implemented (Cal Water 2016).

A number of additional projects have been implemented, are currently being implemented, or are planned to reduce overdraft and reduce/halt seawater intrusion within the groundwater basin. Several of these are summarized below.

Castroville Seawater Intrusion Project. The Castroville Seawater Intrusion Project was completed in 1998. It generates recycled water for use by agricultural water users in the Castroville area during the irrigation season. By providing recycled water for agricultural use, the need for groundwater pumping to meet agricultural demand is significantly reduced. This in turn results in reduced intensity and rate of seawater intrusion.

Salinas Valley Water Project. The Monterey Regional Water Pollution Control Agency (MRWPCA) has utilized a collaborative effort with Salinas Valley interests to develop the Salinas Valley Water Project to address water resources management issues within the Salinas Valley. The project was approved in 2003. The Salinas Valley Water Project provides for the long-term management and protection of groundwater resources in the basin by meeting the following objectives: stopping seawater intrusion and providing adequate water supplies and flexibility to meet current and future (year 2030) needs. In addition, the project provides the surface water supply necessary to attain a hydrologically balanced groundwater basin in the Salinas Valley. The Salinas Valley Water Project includes Nacimiento Dam spillway modification and a rubber dam on the Salinas River near Marina, to allow diversion of river water for treatment and piping to nearby farms for irrigation. The project is also intended improve flood control and Nacimiento Dam safety, recharge the aquifers and improve river flow for migration of the federally designated threatened Steelhead trout. Construction of the Nacimiento spillway modifications was completed in 2009 and Salinas River diversion facility began its operation in April 2010 (http://www.mcwra.co.monterey.ca.us/salinas_valley_water_project_I/salinas_valley_water_project_I.php).

Salinas Valley Groundwater Project Phase II. A conceptual design for Phase II of the Salinas Valley Water Project has been developed by Monterey County Water Resources Agency (MCWRA). Under this plan additional winter flood flows would be diverted from the Salinas River. These diversions, up to 135,000 AFY, could be directly used by urban customers. A technical memorandum was completed in 2013. Phase II incorporates two surface water diversion points and will be accompanied by conveyance and delivery facilities. The project is not yet funded, so its implementation has not begun (Phone Conversation with Howard Franklin, Monterey County Water Resources Agency, December 7, 2016).

Pure Water Monterey Project. The Pure Water Monterey Groundwater Replenishment Project will serve northern Monterey County. The project will provide both purified recycled

water for recharge of the Seaside Groundwater Basin that serves as drinking water supply, and recycled water to augment the existing Castroville Seawater Intrusion Project's crop irrigation supply. The project is jointly sponsored by the MRWPCA and the Monterey Peninsula Water Management District, and also includes participation by the City of Salinas, the Marina Coast Water District, and the MCWRA.

The project includes collection of a variety of new source waters and conveyance of that water to the MRWPCA's regional wastewater treatment plant (regional plant) for treatment and recycling. New source waters include: 1) water from the City of Salinas agricultural wash water system; 2) storm water flows from the southern part of Salinas and the Lake El Estero facility in Monterey; 3) surface water and agricultural tile drain water that is captured in the Reclamation Ditch and Tembladero Slough; and 4) surface water and agricultural tile drain water that flows in the Blanco Drain. The project would enable California American Water Company to reduce its diversions from the Carmel River system by up to 3,500 acre-feet per year by injecting the same amount of purified recycled water into the Seaside Groundwater Basin. The project would also provide additional recycled water for agricultural irrigation in northern Salinas Valley through the Castroville Seawater Intrusion Project's agricultural irrigation system. It is anticipated that in normal and wet years approximately 4,500 to 4,750 acre-feet per year of additional recycled water supply could be created for agricultural irrigation purposes. In drought conditions, the project could provide up to 5,900 acre feet per year for crop irrigation (Denise Duffy & Associates 2016). It is this latter source of new agricultural water that would replace an equivalent volume that is now pumped from the groundwater basin and contributes to groundwater overdraft and seawater intrusion.

Interlake Tunnel. Monterey County is currently in the process of developing the Interlake Tunnel Project which would connect Lake Naciemento and Lake San Antonio in southern Monterey County. The project is intended to move water between the two reservoirs to improve water storage and flood control.

Other Water Supply Projects. Cal Water's UWMP includes discussion of new water supply projects from which Cal Water may be able to obtain water supply that would reduce its need to pump groundwater from the groundwater basin. Chief among these are seawater desalination projects that are in the planning and review process. These include the Coastal Water Project in Marina and the DeepWater Desal project in Moss Landing. Other potential water sources include enhanced recycling and expanded surface water diversions from the Salinas River.

10.2 REGULATORY SETTING

State

Sustainable Groundwater Management Act

On September 16, 2014, Governor Brown signed into law Assembly Bill 1739, Senate Bill 1168, and Senate Bill 1319 (AB-1739, SB-1168, and SB-1319). This three-bill legislative package is known collectively as the Sustainable Groundwater Management Act. The act was amended in the later part of 2015 by Senate Bill 13, Senate Bill 226 and Assembly Bill 1390 to provide clarity to the original law and guidance on groundwater adjudications. This new legislation defines sustainable groundwater management as the "management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results". The legislation defines "undesirable results" to be any of the following effects caused by groundwater conditions occurring throughout the basin:

- Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply;
- Significant and unreasonable reduction of groundwater storage;
- Significant and unreasonable seawater intrusion;
- Significant and unreasonable degraded water quality;
- Significant and unreasonable land subsidence; and
- Surface water depletions that have significant and unreasonable adverse impacts on beneficial uses of the surface water.

The legislation provides for financial and enforcement tools to carry out effective local sustainable groundwater management through formation of groundwater sustainability agencies consisting of local public agencies, water companies regulated by the California Public Utilities Commission, and mutual water companies. The legislation requires that groundwater sustainability agencies within high and medium priority basins under the California Statewide Groundwater Elevation Monitoring Program subject to critical conditions of overdraft prepare and submit a groundwater sustainability plan for the basin by January 31, 2020, and requires groundwater sustainability agencies in all other groundwater basins designated as high or medium priority basins to prepare and submit a groundwater sustainability plan by January 31, 2022. Following state approval, the basin would thereafter be managed under the groundwater sustainability plan. The legislation does not require adjudicated basins to develop groundwater sustainability plans, but they are required to report their water use.

The key intended outcomes and benefits of the Sustainable Groundwater Management Act are numerous, and include:

- Advancement in understanding and knowledge of the State's groundwater basins and their issues and challenges;
- Establishment of effective local governance to protect and manage groundwater basins;
- Management of regional water resources for regional self-sufficiency and drought resilience;
- Sustainable management of groundwater basins through the actions of Groundwater Sustainability Agencies, utilizing State assistance and intervention only when necessary;
- All groundwater basins in California are operated to maintain adequate protection to support the beneficial uses for the resource;
- Surface water and groundwater are managed as "a Single Resource" to sustain their interconnectivity, provide dry season base flow to interconnected streams, and support and promote long-term aquatic ecosystem health and vitality;
- A statewide framework for local groundwater management planning, including development of sustainable groundwater management best management practices and plans;
- Development of comprehensive and uniform water budgets, groundwater models, and engineering tools for effective management of groundwater basins;
- Improved coordination between land use and groundwater planning; and
- Enforcement actions as needed by the SWRCB to achieve region-by-region sustainable groundwater management in accordance with the 2014 legislation.

To assist in attaining the above outcomes, the California Department of Water Resources (DWR) will provide groundwater sustainability agencies with the technical and financial assistance necessary to sustainably manage their water resources. The benefits of these outcomes include:

- A reliable, safe and sustainable water supply to protect communities, farms, and the environment, and support a stable and growing economy; and
- Elimination of long-term groundwater overdraft, an increase in groundwater storage, avoidance or minimization of subsidence, enhancement of water flows in stream systems, and prevention of future groundwater quality degradation.

As part of its responsibilities to implement the act, DWR has defined the 180-foot, the 400-foot, and the Paso Robles aquifers within the groundwater basin as high priority basins. Groundwater sustainability plans must be implemented for these aquifers by 2020. The other aquifers within the groundwater basin must have adopted plans by 2022 (Cal Water 2016).

In March 2017, the Salinas Valley Basin Groundwater Sustainability Agency was formed and is responsible for preparing groundwater sustainability plans. A groundwater sustainability plan is anticipated by January 31, 2022. The goal is to achieve sustainability 20 years after adoption of the plan (http://www.salinasgroundwater.org/).

California Green Building Standards Code

The Green Building Standards Code (CALGreen), which requires all new buildings in the state to be more energy efficient and environmentally responsible, took effect on January 1, 2011. These comprehensive regulations will achieve major reductions in greenhouse gas emissions, energy consumption and water use. Water use reductions are specified based on performance standards contained in the code that target indoor plumbing fixtures such as toilets, showerheads, faucets, etc., as well as outdoor water use through installation of irrigation controllers.

California Water Service Urban Water Management Plan

California's Urban Water Management Plan Act requires urban water suppliers to prepare an UWMP every five years and to file this plan with the DWR, the California State Library, and any city or county within which the supplier provides water supplies. All urban water suppliers, either publicly or privately owned, providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet annually are required to prepare an UWMP.

The UWMP is a foundational document and source of information about the Cal Water Salinas District's historical and projected water demands, water supplies, supply reliability and vulnerabilities, water shortage contingency planning, and demand management programs, including water conservation planning. Among other things, it is used as:

- A long-range planning document by Cal Water for water supply and system planning; and
- Source data on population, housing, water demands, water supplies, and capital improvement projects used in regional water resource management plans prepared by wholesale water suppliers and other regional planning authorities, general plans prepared by cities and counties, and statewide and broad regional water resource plans prepared by DWR, SWRCB, or other state agencies.

The Urban Water Management Plan Act was enacted in 1983. Over the years, it has been amended in response to water resource challenges and planning imperatives confronting California. A significant amendment was made in 2009 as a result of the governor's call for a statewide 20 percent reduction in urban water use by 2020. Colloquially known as 20x2020, the Water Conservation Act of 2009 (also referred to as SB X7-7) required urban retail water suppliers to establish water use targets for 2015 and 2020 that would result in statewide water savings of 20 percent by 2020. Beginning in 2016, urban retail water suppliers are

required to comply with the water conservation requirements in SB X7-7 in order to be eligible for state water grants or loans. Chapter 5 of the Cal Water's Salinas District UWMP contains the data and calculations used to determine compliance with these requirements (Cal Water 2016, pp. 11-12).

County

Monterey County General Plan

The Monterey County General Plan Land Use Element and Public Services Element provide the following goals, policies and objectives pertaining to water supply and distribution applicable to this project. Land Use Element goals LU-1 and LU-2 aim to concentrate development in areas where suitable access to services and facilities such as water and sewer.

Las Palmas Ranch Specific Plan

The following policies in the Las Palmas Ranch Specific Plan are applicable to water supply for the project site.

Policies

1. As the first priority, the entire development must be served by a public utility water company providing domestic and fire flow in accordance with the requirements of State and County health and fire agencies. If a public utility water company satisfactory to the County is no feasible, then an incorporated mutual water company may perform this function.
2. Availability of water meeting the requirements of Policy No. 1 shall be demonstrated as to each increment of development prior to filing of a final subdivision map or issuance of any building permit for that increment of development.
3. Plans and specifications for domestic and fire flow water supply shall be submitted to local and state environmental health agencies for approval.

10.3 THRESHOLDS OR STANDARDS OF SIGNIFICANCE

The CEQA Guidelines (Appendix G) indicates that a project may have a significant effect on the environment if it would:

- Require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or

- Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; or
- Not have sufficient water supplies available to serve the project from existing entitlements and resources including groundwater, and would require new or expanded entitlements.

These are the issues evaluated in the impact analysis below.

10.4 Environmental Impact Analysis

Water Demand

The projected water use of the proposed project is provided in Table 10-1, River View at Las Palmas Water Demand Estimate.

Table 10-1 River View at Las Palmas Potable Water Demand Estimate[1, 2]

Casitas							
	Units	Kitchen Sink	Bath Sink	Toilet	Shower	Misc (Washer)	Totals
A	10	10	10	10	10	1	
B	12	12	24	24	24	12	
C	4	4	8	8	8	4	
Total Fixtures	26	26	42	42	42	17	
Fixture Unit Value		2	1	1.8			
Fixture Units		52	42	75.6	84	34	
Total Fixture Units							287.6
Water Demand (AFY)							2.876 AFY
Assisted Living							
Beds	Use Factor						Totals
52	0.085 AFY/Bed						4.42 AFY
Memory Care							
Beds	Use Factor						Totals
48	0.085 AFY/Bed						4.08 AFY
Total Project							11.376 AFY

SOURCE: EMC Planning Group 2017

NOTE:
[1] Monterey Peninsula Water Management District Fixture Unit Values for Residential Use and Commercial Use Factors have been used to determine project water demand.
[2] Landscaping on the project site would use recycled water.

The Las Palmas Ranch Specific Plan FEIR estimated total water demand for the Specific Plan area to be 922 AFY. When proposed, the specific plan included 1,578 housing units, which was evaluated in the specific plan EIR. However, the Board of Supervisors ultimately approved only 1,031 housing units, approximately sixty-five percent of the original number. Sixty-five percent of 922 AFY would result in a corresponding water demand of approximately 599 AFY.

California Water Service, the water purveyor for the specific plan area, has provided a "can and will serve" for the proposed project. Although California Water Service was not able to provide a current figure for actual water use in the specific plan area, California American Water Company, the wastewater treatment provider for the specific plan area, records wastewater flows from a period of January 2016 to February 2017as an average of 162,398 gpd (email communication with Mike Magretto, California American Water Company, March 13, 2017). This amount of wastewater flow, 162,398 gpd, equals approximately 182 AFY, less than half of the 599 AFY projected as water supply required and approved for the specific plan area. Common landscaped areas of the specific plan area utilize recycled water, but private residences use potable water for outdoor landscaping. However, water used for outdoor use is considered as a component of total water demand for a residence and therefore would not be considered additional water demand not already accounted for in totals. Therefore, it can be concluded that the proposed project and the entire Las Palmas Ranch development combined would use significantly less groundwater than projected in the original EIR. These numbers are presented in Table 10-2, Projected, Existing, and Proposed Las Palmas Ranch Water Use.

Table 10-2 Projected, Existing, and Proposed Las Palmas Ranch Water Use

	1982 EIR	Approved Specific Plan	Actual Water Use	Proposed Project Water Use	Total Water Use
Water Demand	922 AFY	599 AFY	182 AFY	11.376 AFY	193.376 AFY

SOURCES: 1982 Las Palmas Ranch EIR, 2017 California American Water Company, 2017 EMC Planning Group

The proposed project is subject to compliance with County of Monterey code requirements for water conservation. Furthermore, the project site has existing "purple pipe" infrastructure to use recycled water for all on-site landscaping, further reducing demand for domestic water on the site.

Construction or Expansion of New Water Facilities

Based on the "can and will serve" letter provided by California Water Service, the proposed project would not require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The "can and will serve" letter indicates the applicable water purveyor for the site is able to provide water supply for the proposed project based on its existing facilities. Although the proposed project would increase water demand on the project site, no new or expanded facilities, the construction of which could result in environmental impacts, would be required to meet that demand. No impacts would occur associated with construction of new water treatment, storage and distribution facilities.

Groundwater Impacts

As presented earlier in the groundwater setting of this section, the average annual groundwater extraction for the four noted subareas that compose Zone 2C was about 523,000 AFY from 1959 to 2013. The proposed project would add 11.376 acre feet per year, which is a 0.002 percent increase. This contribution to the cumulative existing impact is not considerable, and therefore, is a less-than-significant impact.

10.5 Impact Summary and Mitigation Measures

IMPACT **Increase Potable Water Demand for the Service Area by Approximately 11.376 AFY (Less than Significant)**

As identified in Table 10-1, River View at Las Palmas Water Demand Estimate, the proposed project would have an estimated potable water demand of 11.376 AFY. The "can and will serve" letter provided by California Water Service for the proposed project indicates the applicable water purveyor for the site is able to provide water supply for the proposed project based on its existing facilities. This would be a less-than-significant impact.

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TABLE OF CONTENTS

11.0 EFFECTS NOT FOUND TO BE SIGNIFICANT 1

11.1 CEQA Requirements 1

11.2 Agricultural/Forest Resources 1

11.3 Cultural Resources 1

11.4 Geology & Soils 2

11.5 Hazardous Materials 2

11.6 Surface Hydrology 5

11.7 Mineral Resources 7

11.8 Noise 7

11.9 Public Services 8

11.10 Recreation 9

11.11 Solid Waste 9

11.12 Wastewater 10

Figures

Figure 11-1 Project Site Slopes 11-2

Tables

No table of figures entries found.

11.0
Effects Not Found to be Significant

11.1 CEQA Requirements

CEQA Guidelines 15128 states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. The following environmental topics were reviewed.

11.2 Agricultural/Forest Resources

The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, or timberland. The Monterey County General Plan identifies the property as Grazing Land. The project has been lightly grazed over the years, but only as part of a much larger grazing operation on adjoining properties. The project site is not of a sufficient size to be considered a viable agricultural unit for anything other than grazing. The project will not have an impact on existing or adjoining agricultural uses, or result in the loss or conversion of forest land to non-forest use.

11.3 Cultural Resources

According to the Monterey County General Plan Archaeological Sensitivity Map, the project site is located in an area of low archaeological sensitivity; thus, the likelihood of resources being present on the project site is low. The project site was surveyed in 1977 for the Las Palmas Ranch Specific Plan Final Environmental Impact Report, and it was concluded that no archaeological resources are known or suspected to exist on the project site. The report identified two nearby historical resources, an early adobe and the "Corey House", neither of which resource is located on the project site. Protection of the Corey House was addressed with the development of the neighboring Las Palmas Ranch #1 and the adobe site was determined to be beyond restoration as almost nothing remains, thus development would not impact these nearby resources. The 2010 Monterey County General Plan policies set forth comprehensive measures to avoid and minimize adverse impacts on archaeological resources (Policies OS-6.1, OS-6.2, OS-6.3, OS-6.4 and OS-6.6), paleontological resources (OS-7, OS-7.2, OS-7.3, OS-7.4, and OS-7.5) and human remains (OS-8.1, OS-8.2, OS-8.3, OS-8.4, OS-8.5, OS-8.6, and OS-8.7) in the event unanticipated resources are found on the project site during ground disturbance activities. The project would not impact cultural resources.

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

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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.

Dam Inundation

The Monterey County General Plan EIR concluded that potential for severe inundation in the Salinas Valley should either Nacimiento or San Antonio dams, located approximately 70 miles southeast of the project site, fail is unlikely. Nacimiento and San Antonio dams are routinely inspected, monitored, and studied by the Department of Water Resource's Division of Safety of Dams to verify their integrity and safety which further minimizes risk to property and public safety within project site. Therefore, there would not be impacts related to dam failure and inundation.

11.7 MINERAL RESOURCES

According to the Mineral Resources Map in the General Plan EIR, the project site does not contain any mineral extraction operations or known deposits of minerals of statewide or local importance. Therefore, the proposed project would not result in the loss of availability of minerals of statewide or local importance.

11.8 NOISE

Noise Levels Exceeding Standards/Substantial Increase in Ambient Noise Levels

The proposed project is not expected to produce significant temporary or continuous noise from on-site operations that would significantly increase exiting ambient noise levels. The proposed project does not include point sources of high intensity noise or sources that are unique or excessive relative to other types of residential uses. Due to the nature of the use, the daily activities would be mostly confined inside of buildings. Any outdoor activities are expected to be low intensity passive uses that would not generate excessive noise. Design of the facility, berms, and landscaping would further preclude noise from travelling off the property. On-site operations would not generate noise with an intensity that exceeds county standards at the nearby noise sensitive residential use.

Construction activities on the project site would be subject to Monterey County construction noise standards, including:

- Construction shall occur only during times allowed by ordinance/code unless such limits are waived for public convenience;
- All equipment shall have properly operating mufflers; and
- Lay-down yards and semi-stationary equipment such as pumps or generators shall be located as far from noise-sensitive land uses as practical.

Increases in traffic generation may result during construction activities and from employee trips to and from the facility, which may elevate noise levels along local roadways. The

Monterey County General Plan EIR concluded that the General Plan Noise Element provides sufficient analysis thresholds and recommendations for noise attenuation to effectively mitigate transportation noise impacts.

Safety Element Policy S-7.6 (acoustical analysis) states that an acoustical analysis shall be part of the environmental review process for projects when noise-sensitive receptors are proposed in areas exposed to existing or projected noise levels that are "normally unacceptable" as defined by the County. The area of the project site is not considered by the County to experience normally unacceptable noise levels (Connolly, Luke. Email message to consultant, 9 April 2017). The proposed project is consistent with the development anticipated by the general plan, area plan, and specific plan. Thus, the project would not result in significant traffic noise impacts.

Groundborne Vibration

As with any type of construction, vibration may at times be perceptible by the adjacent neighborhood. However, construction phases that have the highest potential of producing vibration (pile driving and use of jackhammers and other high power tools) would be intermittent and would only occur for short periods of time within the project site and would not result in environmental impacts related to exposure of people and structures to excessive groundborne vibration

Excessive Airport Noise

There are no private airstrips in the immediate vicinity of the project site. The Salinas Municipal Airport is 4.5 miles to the north. Monterey Regional Airport is approximately 8.5 miles to the east. The Marina Airport is approximately 6.5 miles to the northwest. Therefore, the persons living or working on the property would not be subject to excessive noise levels related to airports.

11.9 PUBLIC SERVICES

The proposed project may contribute to future demand for new fire and police protection facilities, the construction of which could have potential to create adverse impacts. Neighboring Las Palmas Ranch #1 currently has private security for the subdivision. The proposed project would participate proportionately in the cost of that security and will provide additional on-site security, which would lessen the need for on-site police protection. Additionally, the project would implement all fire district design recommendations that reflect the current requirements of the Uniform Fire Code and the fire district's regulations to ensure fire-safe structures.

The Monterey County General Plan EIR determined that impacts would be less than significant with full buildout of the general plan because if new facilities are required in the

future to meet demand, they would be subject to independent CEQA review; mitigation of any significant impacts that may be identified would be required where feasible.

The developer of the proposed project would be required to pay development impact fees. Government Code Section 65995(h) provides that payment of development impact fees in accordance with its provisions constitutes "full and complete mitigation of the impacts" of new development.

Las Palmas Ranch does provide a limited amount of private security. There is a guard at the main entrance during the day time but the post is not staffed in the evening or nighttime hours. A periodic patrol through the subdivision is done at night. Given the project is for a senior assisted living community it is unlikely there will be a significant exposure to the need for increased police protection. Fire and ambulance service already exists and there is an agreement in place that the subdivision is a "no-siren zone."

As a senior living facility, the project would not generate any students. Therefore, the project would not result in the need for new or physically altered school facilities.

There would likely only be minimal use of existing recreational facilities in the area. Due to the projects nature and design as a senior assisted living facility containing its own recreational facilities, it is unlikely residents would use off site recreation facilities. No new recreation facilities will be required to be constructed other than those which will be incorporated into the project.

There would be no impacts related to public services.

11.10 RECREATION

Due to the nature of the project being a senior assisted living facility and having on-site recreational facilities incorporated into the project design, it is unlikely residents would use off site recreation facilities. Construction of new recreation facilities would not be required aside from than those which would be incorporated into the project. There would be no environmental impacts associated with construction of new recreational facilities.

11.11 SOLID WASTE

The proposed project will generate solid waste during its construction and operations. Solid waste would likely be delivered to the Johnson Canyon Landfill that is operated by the Salinas Valley Solid Waste Authority, or to other facilities that may be developed or secured by the Salinas Valley Solid Waste Authority over time. The proposed project would be encouraged to participate in the Salinas Valley Solid Waste Authority's recycling and waste reduction programs consistent with state solid waste diversion regulations. The Salinas Valley Solid Waste Authority is responsible for ensuring that the cumulative solid waste

disposal capacity needs of its member jurisdictions are met over time through expansion of existing landfill capacity, creation of new landfill capacity, and/or deployment of waste conversion technology that substitutes for landfill disposal capacity. The Johnson Canyon Landfill service life is approximately 38 years at current permitted capacity and rate of waste fill with no new waste diversion programs (Salinas Valley Solid Waste Authority 2017). If the landfill is expanded, the anticipated service life will range from 80 to 100 years. In the event that the landfill reaches full capacity, the Salinas Valley Solid Waste Authority has several options to choose from including expanding the landfill beyond its current permitted capacity, reconsidering expansion of the closed Jolon Road Landfill, or seeking landfill capacity in the region but outside of their service area (i.e. Monterey Peninsula Landfill located north of Marina, Kirby Canyon Landfill in Santa Clara County or John Smith Landfill in San Benito County).

The Salinas Valley Solid Waste Authority is responsible for ensuring that its solid waste management activities are consistent with related state regulatory requirements. As needed, the Salinas Valley Solid Waste Authority would, through its member agencies, implement programs (e.g. recycling, diversion, etc.) with which new development must participate. The proposed project would not have significant impacts related to solid waste.

11.12 WASTEWATER

The Las Palmas Ranch development is served by two wastewater treatment plants: Las Palmas Wastewater Treatment Plant #1 and #2. The treatment plans are operated by California American Water Company. The design capacity for Las Palmas Wastewater Treatment Plant #1 is 90,000 gallons per day (gpd) and the design capacity for Las Palmas Wastewater Treatment Plant #2 is 145,000 gpd, for a total design capacity of 235,000 gpd. Wastewater flows for the entire Las Palmas Ranch development are directed to one common area and thereby split from this area to one of the treatment plants. According to California American Water Company records of flows from a period of January 2016 to February 2017, average wastewater flows are 162,398 gpd (email communication with Mike Magretto, California American Water Company, March 13, 2017) thereby allowing extra capacity of approximately 72,602 gpd.

The proposed project is estimated to generate approximately 12,070 gpd based on wastewater generation rates of 80 gpd per person used to estimate wastewater generation within the Las Palmas Ranch development. Therefore, with 72,602 gpd available capacity, the treatment plants would be able to accommodate additional wastewater flows from the proposed project. Even a more conservative wastewater generate rate of 100 gpd for the proposed project would fall well within the existing wastewater treatment capacity for the area. A “can and will serve” letter from California American Water Company to project representatives, dated November 3, 2015, regarding the proposed project and the availability of the wastewater treatment to be accommodated is included as Appendix G.

TABLE OF CONTENTS

12.0 ENERGY 12-1

12.1 CEQA Requirements 12-1

12.2 Methodology 12-1

12.3 Energy Setting 12-1

12.4 Energy Regulatory Setting 12-2

12.5 Projected Energy Consumption 12-6

12.6 Guidance for Energy Efficiency/Conservation 12-7

12.7 Conclusion 12-8

12.0 Energy

12.1 CEQA Requirements

Public Resources Code section 21100 (b)(3) requires that an environmental impact report include a detailed statement setting forth mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.

Development of the proposed project will result in an increased demand for energy during construction and operations, once the facility has been developed and occupied. Primary sources of energy use will be transportation fuels, electricity, and natural gas.

For purposes of this analysis, implementation of the project would be considered to result in wasteful or inefficient consumption of energy if it failed to comply with related general plan policies and failed to implement energy demand reduction/efficiency measures. A multitude of state regulations and legislative acts are aimed at improving vehicle fuel efficiency, energy efficiency, and energy conservation. Several of these are described below. Through the CEQA and development review processes, the county will implement these state regulations and guide development of the project to reduce energy consumption.

12.2 Methodology

Estimates of projected energy demand are based on a number of sources cited in this section including the greenhouse gas emissions (GHG) modeling. The GHG modeling assumes that full buildout of project would occur by 2020.

12.3 Energy Setting

Pacific Gas and Electric, one of the largest utilities in the state of California, is the primary purveyor of electricity and natural gas in the county. Pacific Gas and Electric operates a major network of electricity and natural gas transmission lines within its service area, including Monterey County.

For more than a decade, federal, state and regional energy agencies and energy providers have been focused on reducing growth in fossil-fuel based energy demand, especially in the form of transportation fuels and electricity. Key environmental goals have been to reduce air

pollutants and GHGs. As a result, investments in a range of energy efficiency and conservation programs and technologies to improve transportation fuel efficiency have been increasing, as has the focus on land use planning as a tool to reduce vehicle trips/lengths and transportation related energy use as well as the promotion of alternative modes of transportation.

Population growth is a key driver for increasing residential and commercial energy demands and for water pumping and other energy-intensive services, and the county's population and energy demand will continue to grow. In order to minimize the need for additional electricity generation facilities, both the state and regional energy purveyors have focused investments on energy conservation and efficiency over the past decades. Further, as required under the state's Renewable Portfolio Standard, Pacific Gas and Electric is well on its way to obtaining a minimum of 33 percent of its retail power from renewable sources by 2020 based on data from the California Public Utilities Commission (http://www.cpuc.ca.gov/rps_homepage/). The state has recently passed legislation requiring that by 2030, 50 percent of the power supply provided by retail power providers, including Pacific Gas and Electric, must be obtained from renewable sources.

As the project site is vacant, it does not contain any developed uses that are sources of energy demand.

12.4 Energy Regulatory Setting

Energy conservation is embodied in many federal, state, and local statutes and policies. At the federal level, energy standards apply to numerous products (e.g., the EnergyStar™ program) and transportation (e.g., vehicle fuel efficiency standards). At the state level, Title 24 of the California Administrative Code sets energy standards for buildings, rebates/tax credits are provided for installation of renewable energy systems, and the Flex Your Power program promotes conservation in multiple areas. Refer also to Section 3.8 Greenhouse Gas Emissions.

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission is an independent agency that regulates the interstate transmission of electricity, natural gas, and oil. The Federal Energy Regulatory Commission reviews proposals to build liquefied natural gas terminals and interstate natural gas pipelines; it also licenses hydropower projects. Licensing of hydroelectric under the authority of Federal Energy Regulatory Commission includes input from state and federal energy, environmental protection, fish and wildlife, and water quality agencies.

National Energy Policy

The National Energy Policy, established in 2001 by the National Energy Policy Development Group, is designed to help the private sector and state and local governments promote dependable, affordable, and environmentally sound production and distribution of energy for the future (National Energy Policy Development Group 2001). Key issues addressed by the energy policy are energy conservation, repair, and expansion of energy infrastructure, and ways of increasing energy supplies while protecting the environment.

California Energy Commission

The California Energy Commission is California's primary energy policy and energy planning agency. Created by the California Legislature in 1974, the California Energy Commission has five major responsibilities: 1) forecasting future energy needs and keeping historical energy data; 2) licensing thermal power plants 50 megawatts or larger; 3) promoting energy efficiency through appliance and building standards; 4) developing energy technologies and supporting renewable energy; and 5) planning for and directing state response to energy emergencies. Under the requirements of the California Public Resources Code, the California Energy Commission, in conjunction with the Department of Commerce's Division of Oil, Gas, and Geothermal Resources, is required to assess electricity and natural gas resources on an annual basis or as necessary. The Systems Assessment and Facilities Siting Division of the California Energy Commission provides coordination to ensure that needed energy facilities are authorized in an expeditious, safe, and environmentally acceptable manner.

California Public Utilities Commission

The California Public Utilities Commission (CPUC) is the State agency responsible for regulating services and utilities, protecting consumers, safeguarding the environment and assuring Californians' access to safe and reliable utility infrastructure and services. The essential services regulated by the CPUC include electric, natural gas, telecommunications, water, railroad, rail transit and passenger transportation companies. The CPUC was established by the State Legislature as the Railroad Commission in 1911; it was subsequently redesignated through a Constitutional Amendment as the Public Utilities Commission in 1946.

California 2008 Energy Action Plan Update

The state adopted the *California Energy Action Plan* in 2003, followed by the *Energy Action Plan II* in 2005. The current plan, the *California 2008 Energy Action Plan Update*, is California's principal energy planning and policy document. The updated document examines the state's ongoing actions in the context of global climate change, describes a coordinated implementation plan for state energy policies, and identifies specific action areas to ensure

that California's energy resources are adequate, affordable, technologically advanced, and environmentally sound. The *California 2008 Energy Action Plan Update* establishes energy efficiency and demand response (i.e., reduction of customer energy usage during peak periods) as the first-priority actions to address California's increasing energy demands. Additional priorities include the use of renewable sources of power and distributed generation (i.e., the use of relatively small power plants near or at centers of high demand). To the extent that these actions are unable to satisfy the increasing energy demand and transmission capacity needs, clean and efficient fossil-fired generation is supported. The *California 2008 Energy Action Plan Update* examines policy changes in the areas of energy efficiency, demand response, renewable energy, electricity reliability and infrastructure, electricity market structure, natural gas supply and infrastructure, research and development, and climate change (California Energy Commission 2008).

California Building Codes

California's *Energy Efficiency Standards for Residential and Nonresidential Buildings* (California Code of Regulations, Title 24, Part 6) were first established in 1978 to reduce California's energy consumption. The standards were most recently updated in January 2013. Energy efficient buildings require less electricity, natural gas, and other fuels, the use of which creates GHG emissions. Since initial adoption in 1978, California's per capita building energy use has increased about nine percent, while the national per capita building energy use has increased by more than 50 percent (California Energy Commission 2008, 2012).

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, took effect in January 2011 and was most recently updated in January 2013. These comprehensive regulations are intended to achieve major reductions in greenhouse gas emissions, energy consumption, and water use (California Building Standards Commission 2015).

Energy Efficiency Act of 2006 (AB 2021)

This bill encourages all investor-owned and municipal utilities to aggressively invest in achievable, cost-effective, energy efficiency programs in their service territories. The results of this bill were expected to reduce forecasted electricity demand by 10 percent over 10 years from 2006 through 2016, offsetting the projected need to build 11 new major power plants.

California Assembly Bill No. 1493 ("Pavley I Rule")

AB 1493 was enacted on July 22, 2002. It requires CARB to develop and adopt regulations that improve fuel efficiency of vehicles and light-duty trucks. Pavley I requirements apply to these vehicles in the model years 2009 to 2016.

Advanced Clean Cars

In January 2012, CARB adopted an Advanced Clean Cars program, which is aimed at increasing the number of plug-in hybrid cars and zero-emission vehicles in the vehicle fleet and on making fuels such as electricity and hydrogen readily available for these vehicle technologies.

Renewable Energy Legislation/Orders

The California Renewable Portfolio Standard Program, which requires electric utilities and other entities under the jurisdiction of the California Public Utilities Commission to meet 20 percent of their retail sales with renewable power by 2017, was established by SB 1078 in 2002. The renewable portfolio standard was accelerated by seven years, to 20 percent by 2010, through SB 107 in 2006. The program was subsequently expanded by the renewable electricity standard approved by CARB in September 2010, requiring all utilities to meet a 33 percent target by 2020. SB 350, adopted in September 2015, increases the standard to 50 percent by 2030.

California Senate Bill 350 (Clean Energy and Pollution Reduction Act of 2015)

SB 350 was adopted in October 2015. It has several aspects. Among its requirements are that the State Energy Resources Conservation and Development Commission must establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030. Local publicly owned electric utilities are now required to establish annual targets for energy efficiency savings and demand reduction consistent with this goal. The bill also is intended achieve GHG reductions through increased investments in transportation electrification and notes that reducing GHGs to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050 consistent with Executive orders S-03-05 and S-30-15 will require widespread transportation electrification.

California Senate Bill 32 (California Global Warming Solutions Act of 2006: Emissions Limit)

This bill was adopted in September 2006. It established a new statewide GHG emissions reduction target of at least 40 percent below 1990 levels by the end of 2030. It represents an interim GHG reduction target designed to ensure that the state continues to adopt rules and regulations that keep the state on track to meet the 2050 statewide GHG reduction goal of 80 percent below 1990 levels by 2050 set forth in Executive Order S-03-05. The emissions reduction goal set in SB 32 sets expectations for GHG emissions reductions in the state in the

post-AB 32 2020 environment given that emissions reduction goals set forth in AB 32 will have been reached by 2020.

12.5 PROJECTED ENERGY CONSUMPTION

The three primary sources of long-term energy consumption from new development and operations will be fuel use in vehicles traveling within, and to and from the project, use of natural gas, and use of electricity. Each of these energy consumption sources is described below.

Transportation Fuel Use

Table 4.2, Trip Summary, of the CalEEMod presented in Appendix C of this draft EIR, results shows that at buildout, the project would generate approximately 690,549 travel miles annually (approximately 1,892 miles daily). This total is a composite based on total weekday, Saturday, and Sunday vehicle trips. The proposed project would result in an increase in vehicle trips and an increase in the volume of transportation fuel that would be consumed by trucks, light-duty vehicles, passenger cars, relative to existing conditions. The increase will add to the cumulative demand for transportation fuel locally and regionally.

County of Monterey Vehicle Miles Traveled (VMT) data for 2014 was obtained from the *California Department of Transportation (Caltrans) Highway Performance Monitoring System (HPMS) 2014 Public Road Data* (California Department of Transportation 2014; http://www.dot.ca.gov/hq/tsip/hpms/datalibrary.php). Total daily VMT in 2014 was estimated at 10,093,310 miles. At 1,892 daily VMT, the proposed project would represent less than 0.02 percent of the county daily VMT in 2014. At project buildout by 2020, this percentage would be even smaller as anticipated growth in the county would lead to additional total VMT countywide.

Vehicle miles traveled serves as a general proxy for the magnitude of transportation fuel consumption. The change in VMT with the project was input into the Emissions Factors (EMFAC) model (EMFAC2014 v1.0.7) to estimate the change in fuel demand that would result from the VMT increase. The proposed project would result in an increase in fuel demand of about 35,770 gallons per year (approximately 98 gallons per day) relative to the 2020 without project conditions.

Electricity

Section 5.3, Energy by Land Use - Electricity, in the CalEEMod results shows that at buildout, future uses within the site would demand approximately 509,321 kWh of electricity. This demand could be reduced by approximately 11,000 kWh of electricity with installation of energy efficient ENERGY STAR® appliances.

Energy Consumption Data Management System information maintained by the California Energy Commission shows that in 2015, total electricity consumption in the county was 2,660,172,821 kWh; 696,014,751 kWh of this total was attributable to residential uses (http://www.ecdms.energy.ca.gov/elecbycounty.aspx). The project electricity consumption at buildout would represent about 0.02 percent of total 2015 county consumption and likely a smaller percentage of total county consumption in the project buildout year of 2020 as electricity consumption in the county grows over time.

Natural Gas Use

Energy usage is typically quantified using the British Thermal Unit (BTU). The BTU is the amount of energy that is required to raise the temperature of one pound of water by one degree Fahrenheit. As points of reference, the approximate amount of energy contained in a gallon of gasoline, 100 cubic feet (one therm) of natural gas, and a kilowatt hour of electricity are 123,000 BTUs, 100,000 BTUs, and 3,400 BTUs, respectively.

Table 5.2 Energy by Land Use – Natural Gas, in the CalEEMod results shows that at buildout, future uses within the site would demand approximately the equivalent of 1,398,530 BTU (13.98 therms) of energy from natural gas use per year from space heating and other internal building uses. One therm is equivalent to 100,000 BTU.

According to Energy Consumption Data Management System information maintained by the California Energy Commission, in 2015, total natural gas consumption in Monterey County was approximately 102,464,303 therms (http://www.ecdms.energy.ca.gov/gasbycounty.aspx). The project consumption at buildout would represent less than 0.0001 percent of 2015 county consumption and a smaller percentage of total county consumption in the project buildout year of about 2020 as natural gas consumption in the county continues to grow over time.

12.6 GUIDANCE FOR ENERGY EFFICIENCY/CONSERVATION

Reduction of Energy Use - Regulatory Requirements

As described in the Regulatory Setting above, a number of federal and particularly state regulatory programs are being implemented to improve the efficiency of transportation fuel, natural gas, and electricity use. New development within the county must comply with the regulations, many of which are beyond the implementation control of county government and project developers. For example, in the transportation sector, the Pavley I and II standards and the Advanced Clean Car standards will result in improved transportation fuel efficiency. In the building energy use sector, implementation of CALGreen and Title 24 building standards will reduce natural gas and electricity consumption.

Monterey County General Plan

The 2010 general plan includes several policies which will directly and indirectly result in reduced energy consumption. The general plan includes Policy OS-10.11, which adopted a GHG emissions reduction target of 15 percent below 2005 levels by 2020 and required development of a GHG reduction plan for the county by 2013. Policy 0S-10.12 directs the county to adopt a Green Building Ordinance to require green building practices and materials for new development.

Green Building Ordinance

The Green Building Ordinance (18.11- Green Building Standards) was adopted by the county in 2013. The ordinance establishes standards and procedures to require development to comply with GreenPoint or LEED standards or their equivalent. These standards are in addition to, and achieve a greater level of efficiency that the current California Building Code Standards including the CALGreen mandatory requirements.

Las Palmas Ranch Specific Plan

Energy Conservation Policies

> 1. Each residential unit should be should be afforded adequate solar access for the operation of active and passive solar systems. Locating structures with their major axis oriented within 22.5 degrees of true east/west is generally the best means to insure adequate south-facing solar access. For single-family homes, the orientation is fairly simple to implement as is full access to the south wall for passive solar design. For multi-family units, orientation and access are more difficult; generally south roof access for active space hearing or domestic water hearing systems is considered sufficient.
>
> 2. Careful design of structures to utilize solar access and to control heat loss and heat gain can achieve significant energy conservation. When these design elements are coupled with passive design features (thermal storage units, south facing glass, domestic hot water systems and other energy conserving components), the energy conservation potential greatly increases. Support structures built by the developer such as commercial areas, swimming pools, recreation and community buildings should make maximum use of alternate energy sources both to reduce operation costs and to serve as community examples.

12.7 CONCLUSION

As discussed above, the proposed project would represent an extremely small fraction of the county's long-term energy consumption. State and federal regulations regarding fuel efficiency standards for vehicles in California are designed to reduce wasteful, unnecessary

and inefficient use of energy for transportation. The County of Monterey has policies and regulations in place require that new development considers energy reduction and comply with standards that achieve a greater level of efficiency than current California Building Code Standards. Conformance to applicable energy conservation/efficiency regulations and standards would ensure that the proposed project would not result directly or indirectly result in inefficient, wasteful, and unnecessary consumption of energy.

In order to be consistent with the two Las Palmas Ranch Specific Plan policies presented above, the applicant shall implement the following mitigation measure:

Mitigation Measure

ENG-1 Prior to approval of building permits for each of the project components, the applicant shall submit a report to the Director of Planning demonstrating how the project is consistent with the energy conservation policies identified in the Las Palmas Ranch Specific Plan.

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TABLE OF CONTENTS

13.0 CUMULATIVE IMPACTS.....13-1

13.1 CEQA Requirements 13-1

13.2 Cumulative Development Scenario 13-2

13.3 Cumulative Impacts and the Proposed Project's Contribution 13-3

13.0
Cumulative Impacts

13.1 CEQA Requirements

CEQA Guidelines section 15130 requires a discussion of cumulative impacts when the project's incremental effect is cumulatively considerable, as defined in section 15065(a)(3), which states, "The project has possible environmental effects that are individually limited but cumulative considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. A cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR. When the combined cumulative impacts associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting its conclusion that the cumulative impact is less than significant.

A lead agency may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and, therefore, is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the other identified projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

CEQA requires a cumulative development scenario to consist of either a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or, a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

13.2 CUMULATIVE DEVELOPMENT SCENARIO

CEQA requires a cumulative development scenario to consist of either:

- a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or,
- a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

For this EIR, the evaluation of cumulative impacts is based on implementation of the proposed project when considered in conjunction with development forecasts based on the buildout of County of Monterey General Plan. The general plan addresses development within the unincorporated areas of Monterey County with a planning horizon year of 2030 and buildout in 2092. Following adoption, the general plan, the county prepared and adopted area plans for seven sub-areas: North County, Greater Salinas Valley, Greater Monterey Peninsula, Cachagua, South County, and Toro, where the project site is located. Each area plan contains supplemental policies intended to more specifically guide land use activities and development in accordance with the local characteristics of each area.

The general plan addresses development that influences development planning and decision-making in the county. The general plan identifies the project site for medium density residential development. Thus, development on the project site, in some form, has been anticipated by future development projects for the county and specific project area.

The analysis of cumulative impacts for individual topic areas provided below generally assumes, unless otherwise noted, that the cumulative development scenario is existing and probable future development associated with buildout of the county general plan.

As allowed by CEQA Guidelines section 15130 (b)(1)(B), the EIR includes a summary of projections contained in the general plan to form the cumulative projects scenario; i.e. build-out of the general plan. The general plan EIR provides an estimate of approximately 10,015 new residential units and 500 acres of commercial development within the inland areas of unincorporated Monterey County (Table 3-8, New Growth by Planning Area, Community Area and Rural Center, 2006-2030 and 2092 Buildout).

For each topic area, an evaluation and determination as to whether the proposed project's impacts are cumulatively considerable is presented.

13.3 Cumulative Impacts and the Proposed Project's Contribution

As identified in Section 11.0 Effects Not Found to be Significant, the proposed project would have no impact or less-than-significant impacts for the following topics: Agricultural/Forest Resources, Cultural Resources, Geology & Soils, Hazardous Materials, Surface Hydrology, Mineral Resources, Noise, Public Services, Recreation, Solid Waste, and Wastewater. Therefore, the proposed project would not substantially contribute to potential cumulative impacts for these topics, and these topics are not further considered. Only environmental topics identified as having potential significant impacts which may thereby contribute to cumulative impacts are discussed in this EIR.

Aesthetics

The cumulative context for aesthetics impacts are areas of existing and potential future development within Monterey County. The county's general plan EIR concluded that buildout of the general plan with implementation of applicable goals, policies, and actions in the general plan, and specifically within area plans (including the Toro Area plan) would not result in significant impacts on scenic vistas or scenic highways. However, even with implementation of applicable goals, policies, and actions in the general plan, including area plans, the general plan EIR concluded that buildout of the general plan would result in significant and unavoidable impacts to visual character and light and glare impacts in the county.

The LPRSP FEIR (pp 56-59) recognized that the development of Las Palmas Ranch would "… be expected to change from the existing open land/agriculture to a more urban setting softened by landscaping, entry way treatment and architectural control." The LPRSP FEIR also states, "Given the distance from the highway (approximately 1/2-3/4 mile) and the level of development envisioned by the Toro Vista development [now Ferrini Ranch] visual impacts on Highway 68 are insignificant." The FIER goes on to prescribe mitigations measures for the Las Palmas Ranch development. The River View at Las Palmas project incorporated those measures into its design.

As identified in Chapter 5.0 Aesthetics, the proposed project would result in a less-than-significant impact, with mitigation, to altering the visual character of the site. However, as the development of the proposed project would contribute to the overall conversion of vacant county land to developed land, development of the proposed project is a contributor to the already identified significant and unavoidable impact for buildout of the general plan

for the county as a whole. As the project is required to mitigate for these visual impacts (AES-1, AES-2, AES-3), the project's contribution would not be considerable and therefore, would be less than significant.

As identified in Chapter 5.0 Aesthetics, the proposed project would have a less-than-significant impact from the introduction of new sources of light and glare on the project site with the implementation of Mitigation Measure AES-4. Therefore, the project's contribution to the county-wide significant light and glare impacts would not be considerable and therefore, would be less than significant.

Air Quality

The cumulative context for this topic is the effect of existing and future growth of the county general plan on the air quality of the North Central Coast Air Basin (air basin). As discussed in Section 6.0, Air Quality, the air basin is in non-attainment with state mandated thresholds for ozone and suspended particulate matter (PM^{10}).

The county general plan EIR identified significant impacts on regional air quality resulting from buildout of the general plan. Under cumulative conditions, there could be an increase in reactive organic gases (ROG), nitrogen oxides (NOx) and particulate matter (PM^{10}) and these cumulative impacts were determined to contribute considerably to cumulative impacts on air quality.

The proposed project would generate construction and operational emissions of ozone precursors and particulate matter that that would contribute to cumulative air quality impacts. As reported in Section 6.0, Air Quality, the proposed project is consistent with the air district's air quality management plan at 2020 and later time periods. Development of the project site would result in criteria pollutant emissions of ozone precursors and PM^{10} that exceed air district standards and for which the air basin is in nonattainment. According to the CalEEMod air quality modeling, the proposed project would generate operational PM^{10} and ROG emissions that would exceed the air district's thresholds during the construction phase of the project. Therefore, unmitigated project-related PM^{10} and ROG emissions would be cumulatively considerable.

However, implementation of Mitigation Measures AQ-1 – AQ-4 (Section 6.0, Air Quality) would reduce the project contribution to regional air quality impacts to less than cumulatively considerable. For these reasons, the proposed project's contribution to cumulative air quality impacts would not be cumulatively considerable.

Biological Resources

The cumulative context for impacts on biological resources varies with the type of resource being considered, as the range of any particular type of plant or wildlife resource varies in size and species concentration.

As reported in Section 7.0, Biological Resources, if not mitigated, the proposed project would result in contributing to the cumulative loss of important biological resources, including the direct losses of special-status plant and wildlife species and their habitat.

Implementation of the mitigation measures BIO-1 – BIO-6 identified in Section 7.0, Biological Resources, would reduce the project's impacts to biological resources to less than significant. Therefore, the proposed projects' contribution to the cumulative impact on biological resources would not be cumulatively considerable.

Greenhouse Gas Emissions

Global climate change is, as the name implies, a global phenomenon. Greenhouse gas emissions released to the atmosphere from a variety of human activities and natural processes that occur across the globe are contributing to global warming. While the U.S. emits the largest per capita volume of GHGs of any country in the world, other major countries contribute substantial volumes of emissions that continue to grow on a per capita basis. Because climate change is a global phenomenon, it is highly unlikely that any one development project located anywhere in the world would have a significant individual impact on climate change. It is the sum total of contributions of development around the world that contribute to the problem. Hence, global climate change is inherently a cumulative effect.

The individual contribution of a project to GHGs in the atmosphere can generally be quantified in terms of volume of greenhouse gas emissions that it generates. However, the precise indirect effects of that contribution are difficult if not impossible to identify due to the complexity of local, regional, and global atmospheric dynamics and to the broad scale at which global warming impacts such as sea level rise, increase in weather intensity, decrease in snowpack, etc. are known to occur.

As noted in Section 8.0, Greenhouse Gas Emissions, the proposed project as mitigated, would generate approximately 634.02 metric tons CO2e annually that contribute to climate change. Because the potential impacts of the proposed project are inherently considered in a cumulative context, the analysis in Section 8.0, Greenhouse Gas Emissions, is a cumulative impact assessment.

The resident population for this project is conservatively assumed to be the sum of all the casita beds (42) plus approximately one-quarter of the remaining 100 beds (25). As described in section 8.0, Greenhouse Gas Emissions, the one-quarter figure is based on the vehicle trip rates for care facilities, which are approximately one-quarter the rate for single-family residences. The total resident population would, therefore, be 67. The proposed project is projected to create 92 jobs at maximum capacity. Therefore, the service population is 159 (67 residents plus 92 employees). The 2020 GHG efficiency metric for the proposed project is3.99 MT CO_2e/service population (634.02 MT/159). This is below the threshold of significance of

4.88 MT CO_2e/service population. Consequently, the project's GHG emissions fall below the threshold of significance and are not cumulatively considerable.

Traffic

2030 Cumulative Traffic Volume Forecasts

Future traffic growth projections for the study area were derived based on 2030 traffic volume projections within the 2010 Monterey County General Plan. A growth rate of 15 percent was applied to the existing traffic volumes to estimate 2030 cumulative traffic volumes. This is more conservative than the projections developed for SR 68 in the draft scenic highway plan for SR 68 currently being prepared by TAMC, which is based on the Fort Ord Reuse Authority travel demand model that projected slightly less than 10 percent growth along the SR 68 corridor between the years 2016 and 2035.

Cumulative Plus Project Conditions Intersection Operations

Two study intersections are projected to operate at unacceptable levels of service under cumulative plus traffic conditions. Intersection levels of service are summarized in Figure 9-4, Intersection Levels of Service. LOS calculation worksheets are included in the project's traffic impact assessment (Appendix D).

The Reservation Road / SR 68 WB Ramp intersection is projected to operate at an unacceptable LOS D during the PM peak hour under cumulative plus project traffic conditions. The River Road / SR 68 EB Ramp intersection is projected to operate at an unacceptable LOS D during the AM peak hour under cumulative plus project traffic conditions (Higgins 2017).

The project's traffic impact study (Higgins 2017) identified that the following improvements would result in acceptable levels of service at the two intersections. The project's traffic impact study concludes that both of the two options listed below would be feasible, but that each would require Monterey County and Caltrans coordination.

1. Add a dedicated southbound right-turn land at the Reservation Road / SR 68 WB Ramp intersection and a second southbound left-turn lane at the River Road / SR 68 EB intersection.
2. Convert the Reservation Road / SR 68 WB Ramps and River Road / SR 68 EB Ramp intersections to roundabouts.

Per CEQA Guidelines Section 15130(3), a project's contribution is less than cumulatively considerable if a project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. Therefore, by paying TAMC and Monterey County traffic impact fees, which could be used for either or both

mitigation options listed above, the proposed project would have a less than cumulatively considerable impact on the identified intersections.

IMPACT At a Cumulative Level, the Proposed Project Would Add Vehicle Trips to the Reservation Road and State Route 68 Westbound Ramp Intersection and the River Road and State Route 68 Eastbound Ramp Intersection (Less than Significant with Mitigation)

The proposed project would add vehicle trips to the Reservation Road and State Route 68 Westbound Ramp Intersection and the River Road and State Route 68 Eastbound Ramp Intersection. These intersections are projected to operate at unacceptable levels of service under cumulative plus traffic conditions.

Mitigation Measures

CTRA-1 The applicant shall pay Transportation Agency for Monterey County and County of Monterey traffic impact fees.

Cumulative Plus Project Conditions Road Segment Operations

River Road is expected to continue to operate at LOS C between SR 68 and Las Palmas Road and LOS D from Las Palmas Road to Las Palmas Parkway under 2030 cumulative Conditions, according to the 2010 Monterey County General Plan Environmental Impact Report. These are considered acceptable levels of service (Higgins 2017).

As previously stated, SR 68 currently operates at LOS F. The projected increase in traffic volumes under cumulative conditions would exacerbate these conditions and the project would contribute to these cumulative conditions.

IMPACT At a Cumulative Level, the Proposed Project Would Add Vehicle Trips to State Route 68 (Significant and Unavoidable)

Under cumulative plus project conditions, SR 68 is projected to operate at LOS F. The proposed project would contribute to incremental increases in cumulative traffic volumes on SR 68 and would, therefore, contribute to a significant cumulative impact.

There are no mitigation measures available to reduce cumulative-level impacts to a less-than-significant level, based on the Monterey County and Caltrans threshold. However, the project would be required to pay regional traffic impact fees that would serve as some mitigation for impacts to SR 68 improvements. Nevertheless, the project would not be directly implementing any improvements to offset its impacts and would, therefore, have an unmitigated significant impact on SR 68. At this time, it is unknown whether any Caltrans/TAMC improvements to the corridor (e.g., widening and/or roundabouts along the route) would improve the level of service on SR 68.

Furthermore, the applicant has proposed mitigation measures TRA-1 and TRA-2, which would reduce impacts to the traffic circulation in the vicinity of the project site. Additionally, the applicant shall be required to pay TAMC and Monterey County traffic impact fees, per mitigation measure CTRA-1. However, the mitigation measures would not change the proposed project's significant and unavoidable impact to SR 68.

Water Resources

The cumulative development scenario for water supply is development within the boundary of the Salinas Valley Groundwater Basin. As described in Section 10.0, Water Supply, past and present development within the boundary of the groundwater basin has contributed to groundwater overdraft conditions - a significant cumulative impact. The impact analysis presented in Section 10.0, Water Supply, is also a cumulative impact analysis, as the water demands on one project would not significantly affect the groundwater supply.

The proposed project would contribute to the water demand anticipated by the county's general plan and accounted for in the urban water management plan. According to the urban water management plan demand for California Water Service's Salinas District, municipal water demand is anticipated to increase from 19,180 acre-feet per year in 2020 to 23,154 acre-feet per year in 2040 (California Water Service 2016). The 11.376 acre-feet per year required for the proposed project when completed, comprises approximately .05 percent of the California Water Service Salinas District's demand by 2020 and approximately .04 percent of the projected year 2040 demand.

Although the proposed project would increase water demand on the project site, no new or expanded facilities, the construction of which could result in or contribute to environmental impacts, would be required to meet that demand. No new cumulative impacts would occur associated with construction of new water treatment, storage and distribution facilities already in progress or planned to meet demand in the California Water Service Salinas District. The proposed project's contribution to a cumulative increase in water demand would not result in impacts that are greater than those studied and addressed by the general plan EIR and the recently updated urban water management plan. Therefore, the proposed project's contribution to cumulative impacts to water supply is not cumulatively considerable.

TABLE OF CONTENTS

14.0 GROWTH INDUCING 14-1

14.1 CEQA Requirements 14-1

14.2 Economic Growth Inducement 14-1

14.3 Removing Impediments to Growth 14-2

14.4 Population Growth Inducement 14-2

14.0
Growth Inducing

14.1 CEQA REQUIREMENTS

As required by Section 15126.2(d) of the CEQA Guidelines, an EIR must discuss ways in which a proposed project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. Although growth inducement itself is not considered an environmental effect, it could potentially lead to adverse environmental effects.

A project may foster economic or population growth through:

- Creating economic expansion (e.g., changes in revenue base or employment expansion, etc.). Economic expansion effects can include those resulting from the "multiplier effect." A "multiplier" is an economic term used to describe inter-relationships among various sectors of the economy. The multiplier effect relates to the direct employment effect of a project, as well as indirect and induced employment growth. The multiplier effect includes the notion that the on-site, direct employment and population growth resulting from a project is not the complete picture of the growth it has potential to create;
- Removing an impediment to growth, examples of which include changing zoning or general plan designations to enable a greater level of development than was previously foreseen, expanding the capacity of infrastructure beyond that needed to serve a specific project such that the barriers for additional growth are reduced, or establishing an essential public service that previously did not exist and which is necessary to support additional growth; or
- Providing new housing that accommodates additional population growth.

14.2 ECONOMIC GROWTH INDUCEMENT

The proposed project is anticipated to employ 92 persons for operations of the proposed assisted living facility, in addition to creating temporary local employment opportunities

during construction of the facility. The environmental impacts resulting from the direct economic growth inducing effects of the proposed project are evaluated in other sections of this EIR.

It is likely that revenues generated by new development and portions of the incomes received by new employees will be fed back into the local economy. The increased investment in the local economy could in turn have a multiplier effect that indirectly causes business and population growth beyond the boundaries of the immediate project area. The magnitude of this effect, and the types of and locations where new growth could occur as a result are unknown. Consequently, it would be speculative to project the potential environmental effects of indirect population and business growth.

14.3 Removing Impediments to Growth

The project site has been previously identified for development, as it is designated medium density residential in the Monterey County 2010 General Plan, the Las Palmas Specific Plan and the Zoning Ordinance (Title 21). There are, therefore, no policy or regulatory impediments to growth as far as development on the project site. However, as discussed in other areas of this document, approval of the proposed project would require an amendment to the Las Palmas Specific Plan and a use permit and design review from Monterey County.

14.4 Population Growth Inducement

The project site is a 15.67-acre lot (Parcel Q) created as part of the Las Palmas Subdivision #1. The site is located within the boundary of the Las Palmas Ranch Specific Plan. Adopted in 1983, the Las Palmas Ranch Specific Plan designated the property Medium Density Residential (MDR). This is currently the land use designation for the site in the Monterey County 2010 General Plan and Toro Area Plan. The Las Palmas Ranch Specific Plan was adopted by the Monterey County Board of Supervisors in 1983. Also in 1983, the Board of Supervisors adopted the Toro Area Plan, incorporating the Las Palmas Ranch Specific Plan by reference. The property was zoned "MDR/2.61-D" (Medium Density Residential, 2.61 units per acre, with Design Control). This zoning density would allow up to 40 dwellings for approval on the project site. In 2010, the Board of Supervisors adopted the Monterey County 2010 General Plan, including an updated Toro Area Plan, with the project site remaining identified for medium residential development at 2.61 units/acre.

The proposed project includes an amendment to the Las Palmas Specific Plan. The Specific Plan designates the project site for medium density residential development. The proposed project falls under the County's general definition of a residential care facility in that the project will be licensed by the State of California to provide "…24-hour residential care and varying levels and intensities of medical or non-medical care, supervision, services or assistance to persons living in a residential setting." The proposed project is not a residential use under the County codes or the specific plan and the project does not provide dwelling

units that will operate or function as independent units. Therefore, the project would not result in a direct population increase.

TABLE OF CONTENTS

15.0 SIGNIFICANT UNAVOIDABLE IMPACTS 15-1

15.1 Summary of Significant Unavoidable Impacts 15-1

15.0
Significant Unavoidable Impacts

15.1 SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

Based on the environmental analysis provided in Chapters 5-14 of this EIR, most of the impacts associated with the proposed project would be reduced to a level of insignificance through the implementation of mitigation measures. However, the project would result in significant unavoidable impacts as summarized below.

Traffic and Circulation

IMPACT The Proposed Project Would Add Vehicle Trips to State Route 68, which Currently Operates at Level of Service F (Significant and Unavoidable)

The proposed project would add about one AM peak hour trip and four PM peak hour trips to the two-lane section of SR 68 immediately west of the Toro Park interchange. Project traffic will dissipate along the SR 68 corridor at the many crossroads including Torero Drive, San Benancio Road, Corral de Tierra Road, and Laureles Grade, resulting in less than one AM peak hour trip and about two PM peak hour trips west of Laureles Grade. Project traffic would be at or below one peak hour trip west of SR 218. Project-related traffic would not have any effect on SR 68 traffic operations. However, SR 68 currently operates at LOS F and Monterey County and Caltrans consider the addition of a single peak hour trip to be a significant impact when adding to a LOS F situation. Therefore, based on this threshold, the project would have a significant impact on the two-lane section of SR 68 between Toro Park and SR 218. As previously discussed, TAMC, Caltrans, and Monterey County have funding and are studying a variety of operational improvements along the corridor.

There are no mitigation measures available to reduce project-level impacts to a less-than-significant level, based on the Monterey County and Caltrans threshold, because the proposed project would have no effect on traffic operations. However, the project would be required to pay regional traffic impact fees that would serve as some mitigation for impacts to SR 68. Nevertheless, the project would not be directly implementing any improvements to offset its impacts and will, therefore, have an unmitigated significant impact on SR 68. At this time, it is unknown whether any Caltrans/TAMC improvements to the corridor (e.g., widening and/or roundabouts along the route) would improve the level of service on SR 68.

Furthermore, the applicant has proposed to implement the following mitigation measures, which would reduce impacts to the traffic circulation in the vicinity of the project site.

TRA-1 To reduce peak hour trip generation, specifically on SR 68, all employee shift changes for project site operations shall occur outside of morning and evening peak trip hours. A requirement to schedule all morning, day, and night shifts for project operations outside of peak hours shall be included as a condition of approval associated with the conditional use permit.

TRA-2 To reduce overall trip generation to and from the project site, the project developer shall prepare a detailed plan for shuttle service. Shuttle services shall be offered to residents to access areas on the Monterey Peninsula and in Salinas from the project site. Additionally, shuttle service to nearby transportation hubs for employees shall be offered in the shuttle service plan. The shuttle service plan shall be submitted for review and approval to Monterey County prior to approval of any building permits on the project site.

Implementation of these mitigation measures would reduce impacts to traffic circulation in the vicinity of the project site. However, the mitigation measures would not alter the proposed project's significant and unavoidable impact to SR 68.

IMPACT At a Cumulative Level, the Proposed Project Would Add Vehicle Trips to State Route 68 (Significant and Unavoidable)

Under cumulative plus project conditions, SR 68 is projected to operate at LOS F. The proposed project would contribute to incremental increases in cumulative traffic volumes on SR 68 and would, therefore, contribute to a significant cumulative impact.

There are no mitigation measures available to reduce cumulative-level impacts to a less-than-significant level, based on the Monterey County and Caltrans threshold. However, the project would be required to pay regional traffic impact fees that would serve as some mitigation for impacts to SR 68 improvements. Nevertheless, the project would not be directly implementing any improvements to offset its impacts and would, therefore, have an unmitigated significant impact on SR 68. At this time, it is unknown whether any Caltrans/TAMC improvements to the corridor (e.g., widening and/or roundabouts along the route) would improve the level of service on SR 68.

Furthermore, the applicant has proposed mitigation measures TRA-1 and TRA-2, which would reduce impacts to the traffic circulation in the vicinity of the project site. Additionally, the applicant shall be required to pay TAMC and Monterey County traffic impact fees, per mitigation measure CTRA-1. However, the mitigation measures would not change the proposed project's significant and unavoidable impact to SR 68.

TABLE OF CONTENTS

16.0 IRREVERSIBLE IMPACTS.....16-1

16.1 CEQA Requirements..... 16-1

16.2 Proposed Project Effects..... 16-1

16.0
Irreversible Impacts

16.1 CEQA Requirements

CEQA Guidelines section 15126.2(c) requires a discussion of significant and irreversible changes that would be caused by the project if implemented. The use of non-renewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse in the future unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvements that provide access to previously inaccessible areas generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. Public Resources Code Section 21100(b)(2)(B) requires an EIR to include a detailed statement setting forth any significant effects on the environment that would be irreversible if a proposed project is implemented. Examples of irreversible environmental changes, as set forth in CEQA Guidelines Section 15126.2(c), include the following:

- The proposed project would involve a large commitment of nonrenewable resources such that removal or nonuse thereafter is unlikely;
- The primary and secondary impacts of a proposed project would generally commit future generations to similar uses (e.g., a highway providing access to a previously inaccessible area); or
- The proposed project involves uses in which irreversible damage could result from any potential environmental accidents associated with the proposed project.

Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

16.2 Proposed Project Effects

The proposed project would include the consumption of non-renewable building materials and energy resources during the construction phase, as well as the ongoing consumption of energy for lighting, air conditioning, space and water heating, and travel to and from the site during the life of the project. The consumption of such resources is typical of this type of development and would result in an irreversible commitment of natural resources for

construction and operations of the proposed project. The proposed project does not involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.

TABLE OF CONTENTS

17.0 ALTERNATIVES 17-1

17.1 CEQA Requirements 17-1

17.2 Alternatives Considered 17-1

17.3 Alternatives Considered But Rejected 17-9

17.4 Comparison of Alternatives 17-9

Figures

No table of figures entries found.

Tables

Table 17-1 Project Alternatives Summary 17-9

17.0 Alternatives

17.1 CEQA Requirements

CEQA Guidelines section 15126.6(a) requires a description of reasonable alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. It also requires an evaluation of the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. CEQA Guidelines section 15126.6(b) further requires that the discussion of alternatives focus on those alternatives capable of eliminating any significant adverse environmental impacts or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. CEQA Guidelines section 15126.6(e) stipulates that a no project alternative be evaluated along with its impacts.

CEQA Guidelines section 15126.6(d) requires the EIR to present enough information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. CEQA Guidelines section 15126.6(e) requires the identification of an environmentally superior alternative. If the "No Project" alternative is the environmentally superior alternative, then the environmentally superior alternative amongst the remaining alternatives must be identified.

17.2 Alternatives Considered

The following alternatives to the project are considered:

1. Alternative 1: No project/no development;
2. Alternative 2: No project/minimum use;
3. Alternative 3: No project/existing zoning; and
4. Alternative 4: Reduced project.

Each of these alternatives is described below, followed by an analysis of how each alternative may reduce impacts associated with the proposed project.

Alternative 1: No Project/No Development

CEQA Guidelines section 15126.6 (e) requires the "no project" alternative be evaluated along with its impacts. The "no project" alternative analysis must discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Alternative Description

The "no project/no development" alternative assumes no development would occur on the project site. The project site would continue to be vacant land, partially used for grazing. Under this alternative, there would be no potential adverse impacts to aesthetics, air quality biological resources, greenhouse gas emissions, transportation and traffic, or water supply.

Alternative 2: No Project/Minimum Use

Alternative Description

The "no project/minimum use" alternative assumes the proposed project would not be constructed or operated on the project site. Instead, this alternative considers the construction of the minimum allowable use on the subject property, which would be one single family dwelling and any accessory structures considered incidental to residential use, such as barns and storage buildings.

Aesthetics

The proposed project would impact scenic vistas and the visual character of the site, and would introduce new sources of light and glare to the project site and vicinity. Impacts to scenic vistas, the visual character of the site, and the introduction of new sources of light and glare would be potentially significant impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AES-1, AES-2, AES-3, and AES-4.

Alternative 2 would have less aesthetic-related impacts than the proposed project. Although possible to have aesthetic impacts based on the size and location on the project site of any structures related to a single-family residence, any potential impacts would be less than the proposed project. However, this form of development may still be within the public viewshed from scenic vista points, would change the visual character of the site from undeveloped to developed, and would also introduce new sources of light and glare to the project site and vicinity. Similar mitigation measures to reduce impacts to a less-than-significant level as for the proposed project would likely be applicable to Alternative 2,

depending on proposed site design. However, as there would be no discretionary approval for the project, having enforceable mitigation measures applied to the site would be unlikely.

Air Quality

The proposed project would have air quality-related impacts related to emissions during construction of the proposed project on the site. These impacts would be potentially significant impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AQ-1, AQ-2, AQ-3, and AQ-4.

Alternative 2 would have less air quality-related impacts than the proposed project. Construction activities on the project site for one single family residence and associated structures would have construction related emissions; however, based on the reduced scale of construction, construction emissions would not represent significant impacts and no mitigation measures would likely be required to reduce impacts to a less-than-significant level.

Biological Resources

The proposed project would impact biological resources, including potential loss or disturbance of American badgers, potential loss or disturbance of burrowing owls, potential loss or disturbance of Monterey dusky-footed woodrats, potential loss or disturbance of special-status bats, and potential loss or disturbance of nesting birds. All potential impacts can be reduced to less-than-significant levels with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-6. The proposed project would also have a less-than-significant impact on impeding the movement of common wildlife.

Alternative 2 would have much fewer potential biological impacts than the proposed project. Construction activities on the project site for one single family residence and associated structures would minimal impacts significant impacts to biological resources because of a much smaller building footprint.

Greenhouse Gas Emissions

The proposed project's greenhouse gas emissions would be less than significant and no mitigation measures are required. Alternative 2 would result in fewer greenhouse gas emissions, which would be less than significant and no mitigation measures would be required.

Transportation and Traffic

As a combined assisted living facility (100 beds) and detached assisted living units units (26 units; 42 beds), based on ITE trip generation rates for each category, the proposed project would generation approximately 363 daily trips (266 for assisted living facility and 96 for the detached assisted living units. The proposed project would result in less-than-significant

impacts to area intersections and roadways segments of River Road. However, the proposed project would result in a significant and unavoidable impact of adding additional traffic to SR 68.

Based on trip generation rates for single family homes in the Las Palmas development, one single family residences on the project site would generate approximately 7.1 daily trips.

Therefore, Alternative 2 would result in a decreased amount of daily trips to and from the project site and can be expected to have less impacts than the proposed project. However, as even one single family residence could result in additional traffic on SR 68 during the AM and/or PM peak hours, Alternative 2 would also result in a significant and unavoidable impact.

Water Supply

The proposed project would have an estimated water demand of 11.376 AFY. Applying the water demand assigned to the casita units of the proposed project (2.876 AFY for 26 units) for the conceptual build-out of one single family residential unit on the project site would be significantly less. Therefore, while the proposed project would result in a less-than-significant impact to water supply, Alternative 2 would result in a lower water demand.

Alternative 3: No Project/Existing Zoning

Alternative Description

The “no project/existing zoning” alternative assumes the proposed project would not be constructed or operated on the project site. However, considering that the project site is designated for medium density residential development, it is reasonable to assume that up to 40 dwelling units could be approved and constructed on the project site. Although, it is worth noting that other use categories could also be considered for this alternative. Based on existing zoning for the project site, the following uses could be established on the project site:

- Public and quasi-public uses including churches, cemeteries, parks, playgrounds, schools, public safety facility, public utility facilities;
- Mobile home park;
- Agricultural employee housing;
- Christmas tree cutting and removal and other uses of similar agricultural nature;
- Other uses of a similar nature, density and intensity;
- Transitional Housing; or
- Supportive Housing.

Supportive housing is defined by the Monterey County Code as housing with no limit on length of stay that is occupied by a target population. ("Target population" means persons

with low income having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act (California Welfare and Institutions Code, section 4500 et seq.) and may include, among other populations, adults, emancipated youth, families, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (MCC 21.06.1278)) and is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community. Transitional housing and transitional housing development is considered as buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time of no less than six months. The county's zoning code describes each use as being contained within allowed housing units of the zoning district (Monterey County 2017).

Therefore, for purposes of this analysis, Alternative 3 considers that the 40 single-family residential units on the site could also be considered as 40 supportive housing units, or 40 transitional housing units. Each unit could have multiple bedrooms and house a number of persons. For purposes of this alternatives analysis, 40 units of single-family, supportive housing, or transitional units are considered to be roughly equivalent.

Aesthetics

The proposed project would impact scenic vistas and the visual character of the site, and would introduce new sources of light and glare to the project site and vicinity. Impacts to scenic vistas and the introduction of new sources of light and glare would be potentially significant impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AES-1, AES-2, AES-3, and AES-4.

Alternative 3 would have similar aesthetic-related impacts as the proposed project, as development on the site of up to 40 residential units would be expected to occur. This form of development would still be within the public viewshed from scenic vista points, would change the visual character of the site from undeveloped to developed, and would also introduce new sources of light and glare to the project site and vicinity. Mitigation measures applicable to the proposed project would also apply to Alternative 3.

Air Quality

The proposed project would have air quality-related impacts related to emissions during construction of the proposed project on the site. These impacts would be potentially significant impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AQ-1, AQ-2, AQ-3, and AQ-4.

Alternative 3 would have similar air quality-related impacts as the proposed project, as development on the site of up to 40 residential units would be expected to occur. Construction activities on the project site for up to this number of residences would have construction related emissions which would be potentially significant. Mitigation measures applicable to the proposed project would also apply to Alternative 3.

Biological Resources

The proposed project would impact biological resources, including potential loss or disturbance of American badgers, potential loss or disturbance of burrowing owls, potential loss or disturbance of Monterey dusky-footed woodrats, potential loss or disturbance of special-status bats, and potential loss or disturbance of nesting birds. All potential impacts can be reduced to less-than-significant levels with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-6. The proposed project would also have a less-than-significant impact on impeding the movement of common wildlife.

Alternative 3 would have similar biological impacts as the proposed project, as development on the site of up to 40 residential units would be expected to occur. Mitigation measures applicable to the proposed project would also apply to Alternative 3.

Greenhouse Gas Emissions

The proposed project's greenhouse gas emissions would be less than significant and no mitigation measures are required. Alternative 3 would also result in greenhouse gas emissions which would be less than significant and no mitigation measures would be required.

Transportation and Traffic

As a combined assisted living facility (100 beds) and detached assisted living units (26 units; 42 beds), based on ITE trip generation rates for each category, the proposed project would generation approximately 362 daily trips (266 for assisted living facility and 96 for senior adult housing units. The proposed project would result in less-than-significant impacts to area intersections and roadways segments of River Road. However, the proposed project would result in a significant and unavoidable impact of adding additional traffic to SR 68.

Based on trip generation rates for single family homes in the Las Palmas development, 40 single family residences on the project site would generate approximately 284 daily trips.

Therefore, Alternative 3 would result in an increased amount of daily trips to and from the project site and can be expected to have greater impacts than the proposed project. Furthermore, Alternative 3 would also result in a significant and unavoidable impact to SR 68. Mitigation measures applicable to the proposed project would also apply to Alternative 3.

Water Supply

The proposed project would have an estimated water demand of 11.376 AFY. Applying the water demand assigned to the casita units of the proposed project (2.876 AFY for 26 units) for the conceptual build-out of up to 40 single family residential units on the project site would likely be less than 5.00 AFY. Therefore, while the proposed project would result in a less-than-significant impact to water supply, Alternative 3 would result in a lower water demand.

Alternative 4: Reduced Project

Alternative Description

The "reduced project" alternative includes a reduced development footprint. For conceptual purposes, Alternative 4 eliminates the casitas from the proposed project. This would result in the loss of 26 living units with 42 beds, representing 30 percent of the total beds of the proposed project, and would result in a proportionate reduction in environmental impacts. Therefore, under this reduced project scenario, development on the project site would include the assisted living facility and memory care living facility, and other associated site improvements.

Aesthetics

The proposed project would impact scenic vistas and the visual character of the site, and would introduce new sources of light and glare to the project site and vicinity. Impacts to scenic vistas and the introduction of new sources of light and glare would be potentially significant impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AES-1, AES-2, AES-3, and AES-4.

Alternative 4 would have similar, albeit slightly less, aesthetic-related impacts as the proposed project, as development on the site of the assisted living facility and memory care facility would still be within the public viewshed from scenic vista points and would also introduce new sources of light and glare to the project site and vicinity. Mitigation measures applicable to the proposed project would also apply to Alternative 4.

Air Quality

The proposed project would have air quality-related impacts related to emissions during construction of the proposed project on the site. These impacts would be potentially significant impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AQ-1, AQ-2, AQ-3, and AQ-4.

Alternative 4 would have similar air quality-related impacts as the proposed project, but to a lesser extent based on a reduced amount of construction activities that would occur on the site. Mitigation measures applicable to the proposed project would also apply to Alternative 4.

Biological Resources

The proposed project would impact biological resources, including potential loss or disturbance of American badgers, potential loss or disturbance of burrowing owls, potential loss or disturbance of Monterey dusky-footed woodrats, potential loss or disturbance of special-status bats, and potential loss or disturbance of nesting birds. All potential impacts can be reduced to less-than-significant levels with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-6. The proposed project would also have a less-than-significant impact on impeding the moment of common wildlife.

Alternative 4 would have similar impacts to biological resources as the proposed project, but to a lesser extent based on a reduced amount of development which would occur on the site. Mitigation measures applicable to the proposed project would also apply to Alternative 4.

Greenhouse Gas Emissions

The proposed project's greenhouse gas emissions would be less than significant and no mitigation measures are required. Alternative 4 would also result in greenhouse gas emissions that would be less than significant and no mitigation measures would be required. Furthermore, based on overall reduced development on the site, greenhouse gas emissions from Alternative 4 would be less than the proposed project.

Transportation and Traffic

As a combined assisted living facility (100 beds) and detached senior adult housing units (26), based on ITE trip generation rates for each category, the proposed project would generation approximately 362 daily trips (266 for assisted living facility and 96 for senior adult housing units). The proposed project would result in less-than-significant impacts to area intersections and roadways segments of River Road. However, the proposed project would result in a significant and unavoidable impact of adding additional traffic to SR 68 in the AM and PM peak hours.

Based on ITE trip generation rates for assisted living facilities, Alternative 4 would generate approximately 266 daily trips, as compared to 362 daily trips of the proposed project. Alternative 4 would result in fewer impacts to traffic than the proposed project. However, Alternative 4 would also result in a significant and unavoidable impact.

Water Supply

The proposed project would have an estimated water demand of 11.376 AFY. Demand for water supply of Alternative 4 would be less than the proposed project, based on the overall reduction in development on the project site, reflecting an overall reduced water demand for the site. The estimated water demand for Alternative 4 would be 8.5 AFY. Alternative 4 would result in a less-than-significant impact on water supply, however to a lesser extent than the proposed project.

17.3 ALTERNATIVES CONSIDERED BUT REJECTED

An alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in west Salinas, shopping, and regional roadway access.

Having an alternative access to the project site was also considered as an alternative, but rejected from further consideration. Alternative access either directly from River Road or as a new internal subdivision roadway would not decrease impacts of the proposed project and may result in increased impacts as compared to the proposed project, such as increased traffic, visual, biological, and impacts to recreational areas associated with entry from River Road.

17.4 COMPARISON OF ALTERNATIVES

The alternatives are summarized and compared in a matrix format in Table 17-1, Project Alternatives Summary.

Table 17-1 Project Alternatives Summary

Environmental Topic	No Project/No Development	No Project/Min. Development	No Project/ Existing Zoning	Reduced Project
Aesthetics	-	-	=	-
Air Quality	-	-	=	-
Biological Resources	-	-	=	-
Greenhouse Gas Emissions	-	-	=	-
Transportation and Traffic	-	-	+	-
Water Supply	-	-	-	-
Project Objectives	Not Met	Not Met	Not Met	Partially Met

SOURCE: EMC Planning Group 2017

NOTE: (—) less, (=) similar, (+) greater

The no project/no development alternative would result in no potential adverse environmental impacts, but would not meet any of the proposed project objectives. The no project/minimum development alternative would result in less environmental impacts than the proposed project, but would not meet any of the proposed project's objectives. The no project/existing zoning alternative would result in a similar level of impacts as the proposed project; however, and would not meet the objectives of the proposed project. The reduced

project would have an overall reduction in intensity of potential impacts based on the overall reduction in development on the project site, but the reduced project alternative would only partially meet the objectives of the proposed project and may prove to be economically infeasible. Therefore, the environmentally superior alternative that would partially meet the objectives of the proposed project would be the reduced project alternative.

TABLE OF CONTENTS

18.0 DOCUMENT AND WEB SOURCES.....18-1

18.0
Document and Web Sources

This section provides the document and web sources referenced in the EIR.

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TABLE OF CONTENTS

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19.0
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APPENDIX A

LAS PALMAS RANCH SPECIFIC PLAN AND FINAL EIR

LAS PALMAS RANCH SPECIFIC PLAN

MONTEREY COUNTY, CALIFORNIA

SEPTEMBER, 1983

MONTEREY COUNTY BOARD OF SUPERVISORS
William Peters, Chairman
Marc del Piero
Michal Moore
Dusan Petrovic
Barbara Shipnuck

MONTEREY COUNTY PLANNING COMMISSION
David Hendrick, Chairman
S. Gary Varga, 1st Vice Chairman
Calvin Reaves, 2nd Vice Chairman
Peter Cailotto
Louis Calcagno
Tom Glau
Manuel Jiminez
Thomas Mill
Lynn Riddle

MONTEREY COUNTY PLANNING DEPARTMENT
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Leblanc & Company, Economics
Brian Finegan, Legal
Brandon & Tibbs, Accountants, Accounting & Finance

Adopted by the Monterey County Planning Commission
April 15, 1983

Adopted by the Monterey County Board of Supervisors
September 20, 1983

INDEX

I INTRODUCTION

A. Format and Content of this Specific Plan

B. Nature and Purpose of the Plan

C. Statutes

D. Existing Conditions

II LAS PALMAS RANCH SPECIFIC PLAN

A. Introduction

1. The Value of Goals

2. The Function of Policies

B. Phasing of Development

C. Housing and Residential Land Use

D. Commercial Land Use

E. Circulation

F. Conservation and Open Space

G. Energy Conservation

H. Preservation of Significant Agricultural Land

I. Design and Sensitivity

J. Erosion, Drainage and Flood Control

K. Public Facilities and Services

1. Water

2. Wastewater

3. Schools

4. Fire Protection

5. Police Protection

III THE REGULATORY FUNCTION

A. CEQA Compliance

B. Zoning

1. Interim Zoning

2. Ultimate Zoning

C. Use Permits

D. Subdivision

E. Conditions of Approval

F. Modifications to Plan

IV NONREGULATORY IMPLEMENTATION

A. Assessment and Service District Policies

B. Homeowners' Association Policies

APPENDIX A - River Road Area of Development Concentration General Plan Amendment

GRAPHICS INDEX

FIGURE	TITLE	OPPOSITE PAGE
A	Aerial View Showing Monterey Bay	Following Index
B	Vicinity Map	I-1
C	Schematic Slopes Map	I-4
D	Las Palmas Ranch Specific Plan Land Use Table	I-6
E	Specific Plan Land Use Map	II-1
F	Corey House Restoration	II-6
G	1980 Traffic Volumes - Directional Split Data	II-7
H	Frontal Slopes Map	II-12
I	Erosion and Drainage Control Concepts	II-18
J	Erosion and Drainage Control Concepts	II-19
K	Conceptual Cross Sections, Neighborhood Open Spaces	II-20

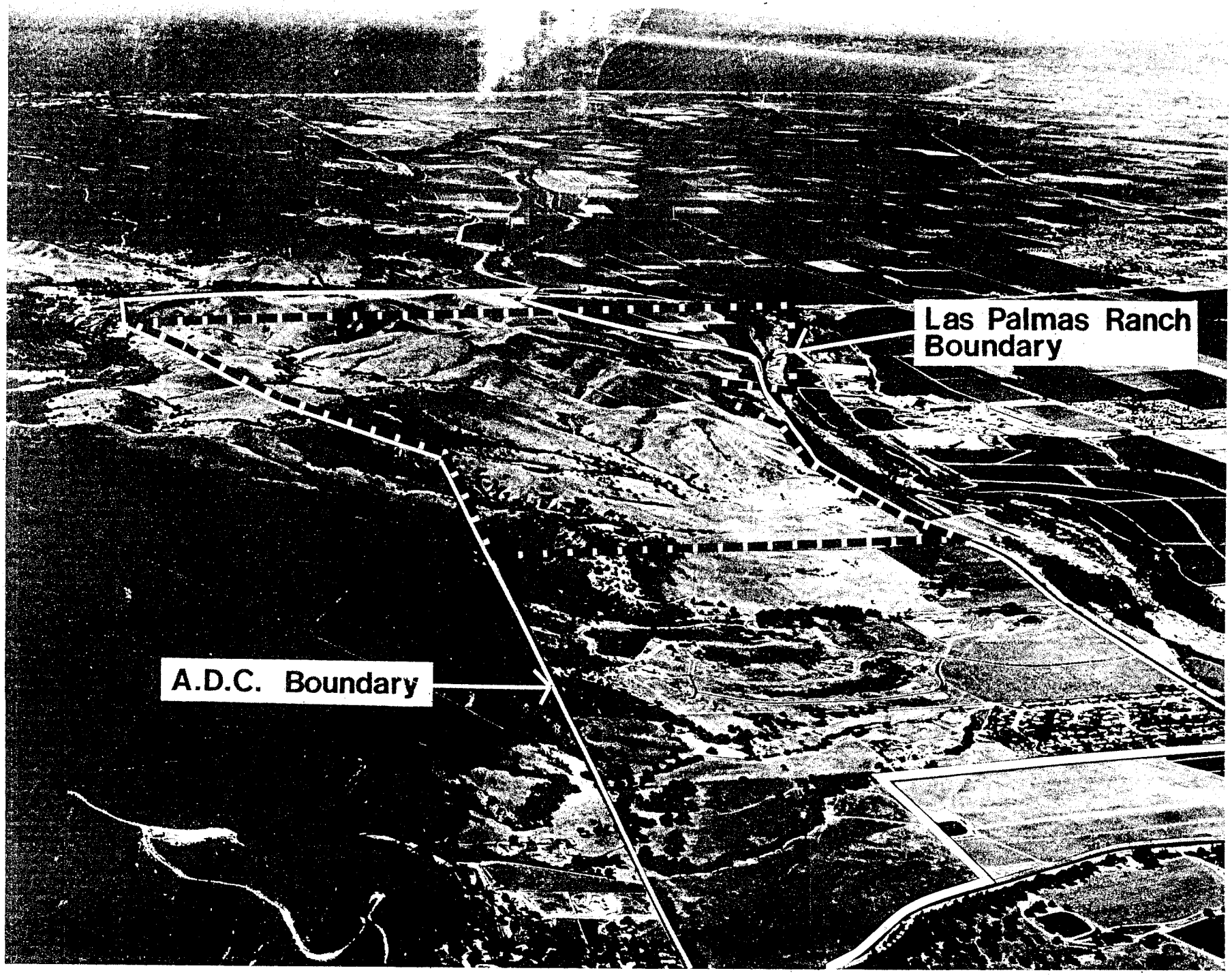


FIGURE A AERIAL VIEW SHOWING MONTEREY BAY

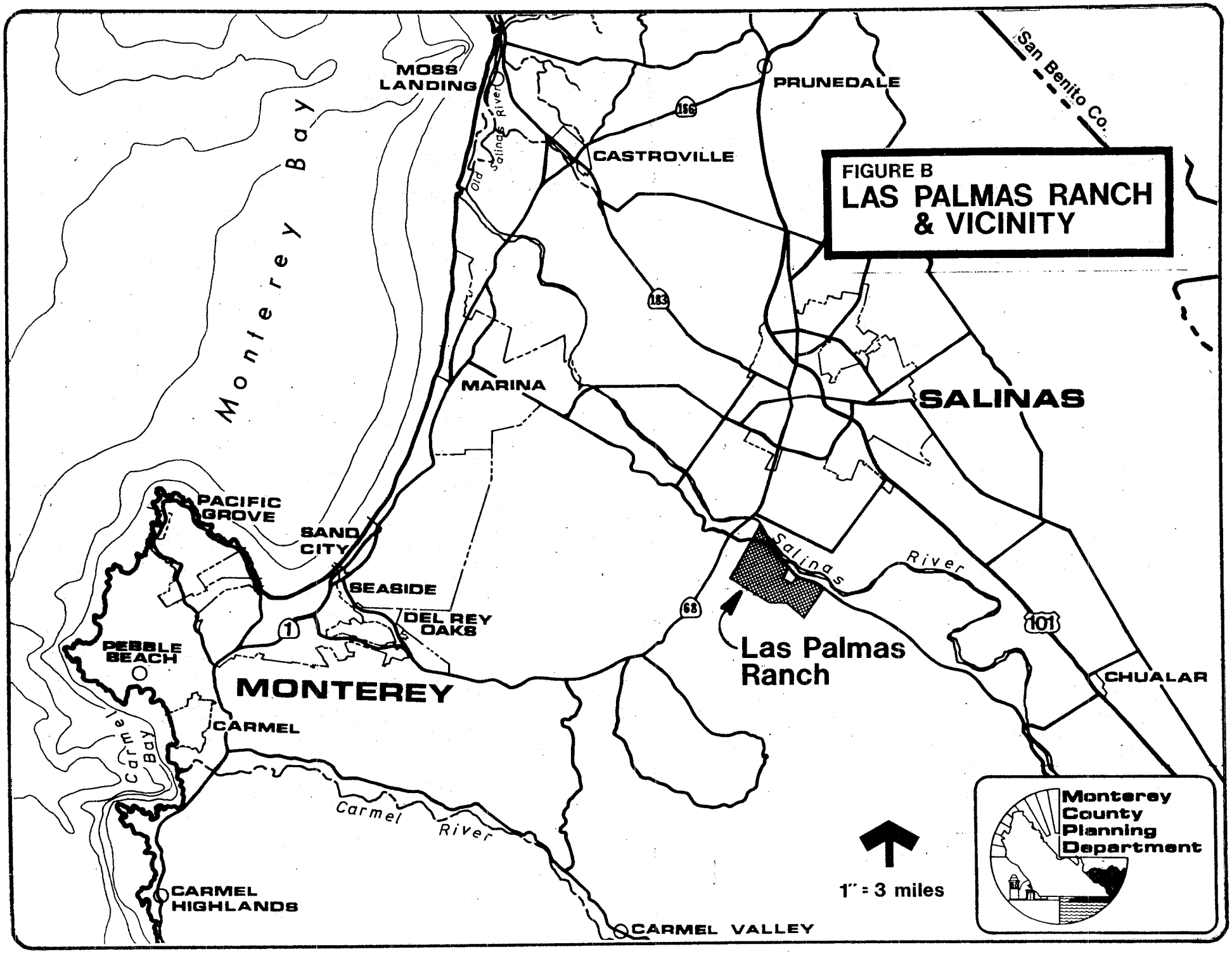


FIGURE B
LAS PALMAS RANCH
& VICINITY
MOSS LANDING
Monterey Bay
Old Salinas River
PRUNEDALE
San Benito Co.
156
CASTROVILLE
183
MARINA
SALINAS
PACIFIC GROVE
SAND CITY
SEASIDE
DEL REY OAKS
1
68
101
Salinas River
Las Palmas Ranch
PEBBLE BEACH
MONTEREY
CARMEL
CHUALAR
Carmel Bay
Carmel River
CARMEL HIGHLANDS
CARMEL VALLEY
1" = 3 miles
Monterey County Planning Department

CHAPTER I
INTRODUCTION TO THE SPECIFIC PLAN

A. FORMAT AND CONTENT OF THIS SPECIFIC PLAN

This Las Palmas Ranch Specific Plan is presented in four parts, including this introductory chapter.

Chapter II presents the Las Palmas Ranch Specific Plan.

Chapter III explains the regulatory process that must be undertaken in order for the developer and the County to implement this Specific Plan. This chapter also describes any changes required in the ADC criteria and in county ordinances in order to implement this Specific Plan.

Non-regulatory elements of plan implementation are described in Chapter IV. While local government is not always directly concerned with the action of the private sector, these elements will have an important affect on overall progress toward building Las Palmas Ranch and on the timing and phasing of both public and private decisions.

B. NATURE AND PURPOSE OF THE PLAN

The Las Palmas Ranch Specific Plan serves as the primary instrument for securing approval of the County of Monterey to carry out semi-rural development proposals of the Las Palmas Ranch Partnership under the Monterey County General Plan.

The implementation of the Las Palmas Ranch Specific Plan calls for the application of design, phasing, financing and regulatory techniques which have emerged from the creation of other successful community developments throughout the State and country. The Las Palmas Ranch Partnership and the County of Monterey must each play an important role in achieving the gradual transition of a controlled amount of land to a development status while maintaining the integrity of adjacent lands where intensified development is not called for in the General Plan. There is a variety of tools which enable local government to monitor the development process; including relevant state statutes, the Monterey County General Plan, and local ordinances. This Specific Plan provides an additional tool.

The Specific Plan has several functions:

1. The Specific Plan presents the goals of the developer.

2. The Specific Plan describes and illustrates design and construction concepts for the Las Palmas Ranch which are consistent with policies of the General Plan.

3. The Specific Plan sets forth the procedures which will be utilized by the County to implement these policies and concepts.

4. The Specific Plan describes various non-regulatory tools of implementation which are needed to achieve the goals of the developer and the County.

This Specific Plan for Las Palmas Ranch provides a unique opportunity to devise a development scheme which reflects a more rational and human scale to semi-rural living than generally has resulted from the local planning process in California. The development of Las Palmas Ranch is, to some extent, then, a bold challenge to the creativity of local government and the developer to respond to the needs of the community through a productive team effort.

The River Road ADC boundaries are Pine Canyon Road on the east, River Road on the north, Highway 68 on the west and Toro Regional Park on the south, but excludes the St. John's College and Marks properties. The ADC includes other land than the Las Palmas Property, but does not include that portion of the Las Palmas Ranch located on the north side of River Road.

C. STATUTES

The Las Palmas Specific Plan has been prepared under the authority of the following sections of the California Government Code:

> Section 65450. The planning agency may, or if so directed by the legislative body shall, prepare specific plans based on the General Plan and drafts of such regulations, programs and legislation as may in its judgment be required for the systematic execution of the general plan and the planning agencies may recommend such plans and measures to the legislative body for adoption.
>
> Section 65450.1. A specific plan need not apply to the entire area covered by the general plan. The legislative body or the planning agency may designate areas within a city or a county for which the development of a specific plan will be necessary or convenient to the implementation of the general plan. The planning agency may, or if so directed by the legislative body shall, prepare specific plans for such areas and recommend such plans to the legislative body for adoption.
>
> Section 65451. Such specific plans shall include all detailed regulations, conditions, programs and proposed legislation which shall be necessary or convenient for the systematic implementation of each element of the general plan listed in Section 65302, including, but not limited to, regulations, conditions, programs and proposed legislation in regard to the following:

(a) The location of housing, business, industry, open space, agriculture, recreation facilities, educational facilities, churches and related religious facilities, public buildings and grounds, solid and liquid waste disposal facilities, together with regulations establishing height, bulk and setback limits for such buildings and facilities, including the location of areas, such as flood plains or excessively steep or unstable terrain, where no building will be permitted in the absence of adequate precautionary measures being taken to reduce the level of risk to that comparable with adjoining and surrounding areas.

(b) The location and extent of existing or proposed streets and roads, their names or numbers, the tentative proposed widths with reference to prospective standards for their construction and maintenance, and the location and standards of construction, maintenance and use of all other transportation facilities, whether public or private.

(c) Standards for population density and building density, including lot size, permissible types of construction, and provisions for water supply, sewage disposal, storm water drainage and the disposal of solid waste.

(d) Standards for the conservation, development, and utilization of natural resources, including underground and surface waters, forests, vegetation and soils, rivers, creeks, and streams, and fish and wildlife resources. Such standards shall include, where applicable, procedures for flood control, for prevention and control of pollution of rivers, streams, creeks, and other waters, regulation of land use in stream channels and other areas which may have a significant effect on fish, wildlife and other natural resources of the area, the prevention, control and correction of soil erosion caused by subdivision roads or any other sources, and the protection of watershed areas.

(e) The implementation of all applicable provisions of the open-space element as provided in Article 10.5 (commencing with Section 65560) of this chapter.

(f) Such other measures as may be necessary or convenient to insure the execution of the general plan.

In the last few years, there have been a number of amendments to various other sections of State Codes which are relevant to the purposes of the Specific Plan. These include:

Government Code Section 65860(a). County or city zoning ordinances shall be consistent with the general plan of the county or city by June 30, 1973.

Business and Professions Code Section 11526(c). No city or county shall approve a tentative or final subdivision map unless the governing body shall find that the proposed subdivision together with the provisions for its design and improvement, is consistent with applicable general or specific plans of the city or county.

D. EXISTING CONDITIONS

The environmental setting of the Las Palmas Ranch property was initially described in the report Las Palmas Ranch Environmental Resources Inventory, completed in 1978 and accepted by the Planning Commission and the Board of Supervisors in January of 1979. That inventory is incorporated herein by reference; however, portions are repeated below in order to provide background information on the site as it exists.

The site is comprised of approximately 1578 acres, fronting on River Road approximately one-half mile to the east of the intersection of River Road and State Highway 68 and continuing east for approximately two miles.

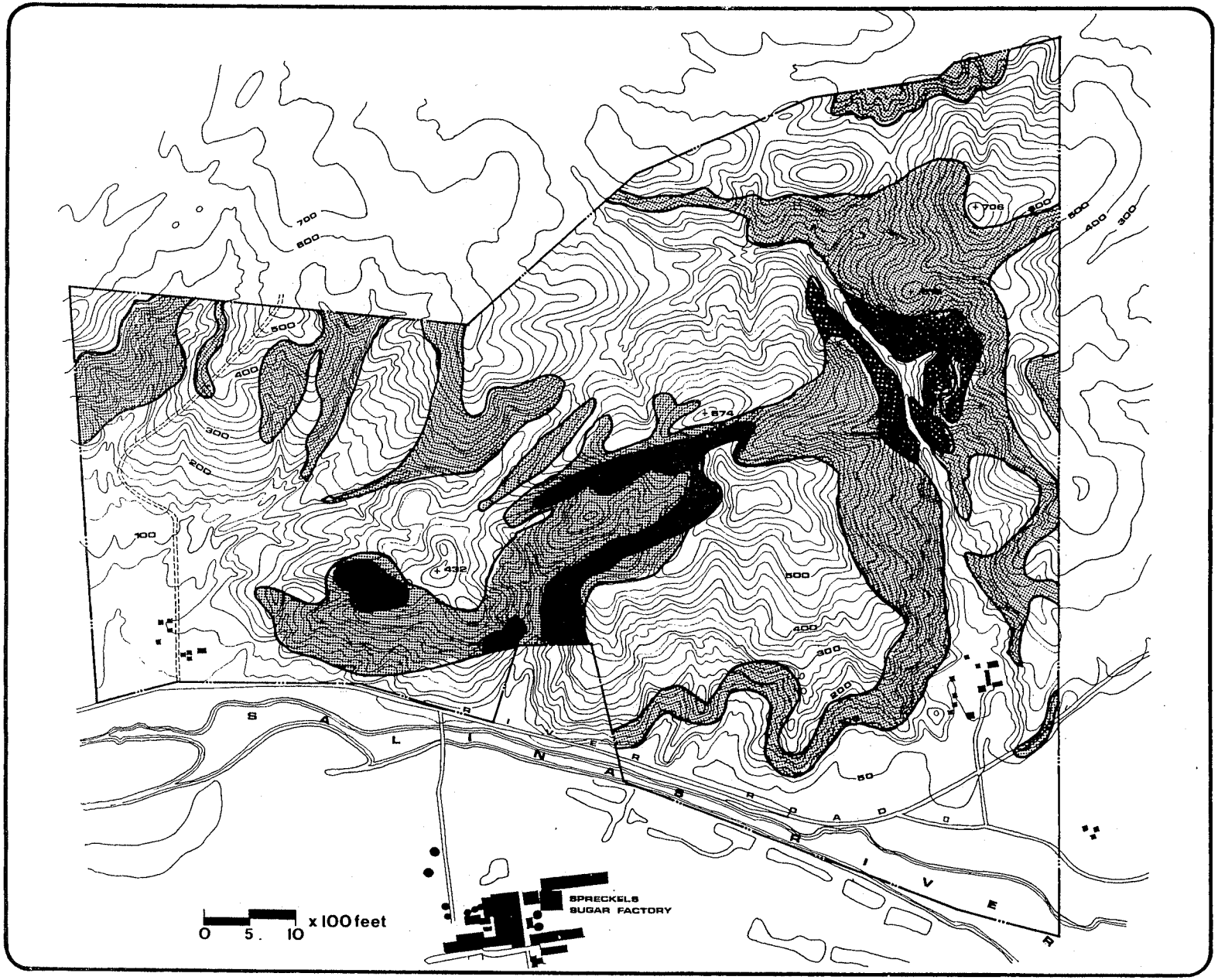
It is irregular in shape and topography. Ground level varies from approximately 40 feet mean sea level (MSL) to 700 feet MSL. General slopes are moderate although there are a few steep canyons.

SLOPE ANALYSIS OF LAS PALMAS RANCH

Slope Category	Acreage	Percentage of Total Acreage
0-10%	280	18
11-20%	488	31
21-30%	326	21
30%+	481	30

The site is essentially vacant and is used primarily for grazing. Row crops are farmed on a small portion of the Ranch north and south of River Road and bordering the Salinas River. This land will remain substantially in agricultural use.

The land surrounding the Las Palmas site is primarily in residential use. Beyond the western border lies vacant land, the former Ferrini Ranch, now approved for residential development in accordance with the Toro Vista Specific Plan, adopted December 16, 1980. Further west, across Highway 68, are residential developments: Serra Village, Toro Creek Estates, Toro Sunshine, Toro Park Estates and Creekside. These developments range in density from four to seven dwelling units per acre. On the eastern boundary is Vista Del Rio, a residential development of eighty one-acre lots. Other properties to the east include the Indian Springs Ranch Subdivision, a clustered development at an overall density of one unit per acre, and the Pedrazzi Subdivision, a standard subdivision of ninety-five homes on lots average one-third acre in size. Directly across the Salinas River, to the north, is the Spreckels sugar plant complex and the town of Spreckels. On the south border is Toro Regional Park.



Las Palmas Ranch

FIGURE C

SCHEMATIC SLOPE MAP

- 0-30% SLOPE
- 30-50% SLOPE
- 50%+ SLOPE

Monterey County Planning Department

Although the seismic safety element indicates the possibility of an inferred fault, referred to as the King City (Reliz-Rinconada) fault, in the vicinity of Las Palmas Ranch, extensive exploration by geologists Cooper & Clark (Geotechnical Evaluation November 19, 1980 and Fault Evaluation May 20, 1981) have verified that there is no evidence to support existence of that fault on Las Palmas Ranch property.

A series of natural drainage courses traverse the property in a northeasterly direction. These serve relatively small drainage areas which originate from within the property boundaries. Most of the soils in these areas have moderate to high permeability, and most of the storm run-off percolates into the groundwater basin before reaching River Road. Such drainage conditions do not appear to present any danger to the areas proposed for development. The exception is the portion of the property lying northeast of River Road, not proposed for housing, which lies within the one hundred year flood line as suggested by the U. S. Corps of Engineers.

The area is blessed with a Mediterranean type climate: mild year-round temperatures, temperate winters and an average rainfall ranging from thirteen inches at River Road to fifteen inches at the upper elevations of the site.

Currently, three wells are supplying water to the property; one produces approximately 1,650 gallons per minute of water of excellent quality. According to the State Water Resources Control Board Reports the surface and groundwater quality of the Salinas River Sub-Basin is suitable for all water uses.

Air quality reports by the Air Pollution Control District indicate pollutants at a level well within Federal standards. (See Inventory, Appendix C.) Air circulation and air quality at the site are good. Moderate, prevailing northwesterly winds blow almost daily. Emissions from motor vehicles on River Road is the primary source of pollutants. These are presently minimal, and the prevailing winds disperse these pollutants down the valley, away from Salinas.

The major botanical resource of the Las Palmas Ranch site is the Coast Live Oak. These trees are widely dispersed throughout the property. Some of the specimens are two to three hundred years old. Generally, cattle grazing has suppressed the growth of seedlings and young oaks. There are two kinds of brush, chamise and sagebrush which flourish in two areas. Native grasses have long since been replaced by European annual grasses. Riparian vegetation is found along the Salinas River, principally willows and cottonwood.

The mammal and bird population includes species adapted to open grassland and pasture. Generally, these are transient. Permanent residents include some smaller mammals such as rodents and reptiles. The habitat appears ideal for seed eating birds such as doves and quail; and woodpeckers because of the many dead or senescent oaks. No rare or endangered species of mammal, bird, reptile or amphibians is evident on the property.

The Las Palmas Ranch property generates no significant amount of noise. Traffic on River Road and on nearby Highway 68 is the primary source of noise, but

field studies of Community Noise Equivalent Levels found noise levels to be in the "permissible" range. The site lies several miles off the commercial flight patterns of both the Monterey and Salinas airports, so noise tends to be intermittent and of a very low volume.

An archeological survey of the site revealed no pre-historic archeological resources. Remains of an adobe structure were located, but these were deemed beyond restoration. A ten thousand square foot Victorian manor is the site's only historically significant structure. The Las Palmas Ranch Partnership has recently restored the exterior of this imposing building, and plans to restore its interior. The developers have also been responsible for having the manor placed on the roster of National Historical Buildings (see Appendix A of the Inventory).

There are no commercial or shopping facilities within the boundaries of the proposed River Road ADC. The closest complete shopping complex is located at the intersection of South Main Street and Blanco Road in Salinas; approximately two and one-half miles to the north.

Recreational opportunities in the Toro area are numerous and varied. Toro Regional Park and Laguna Seca Recreational Area are available for picnicking, biking, auto racing and horse-back riding. Corral de Tierra Country Club, Laguna Seca Golf Club and Chamisal Tennis Club are also close at hand.

FIGURE D: LAS PALMAS RANCH SPECIFIC PLAN LAND USE TABLE

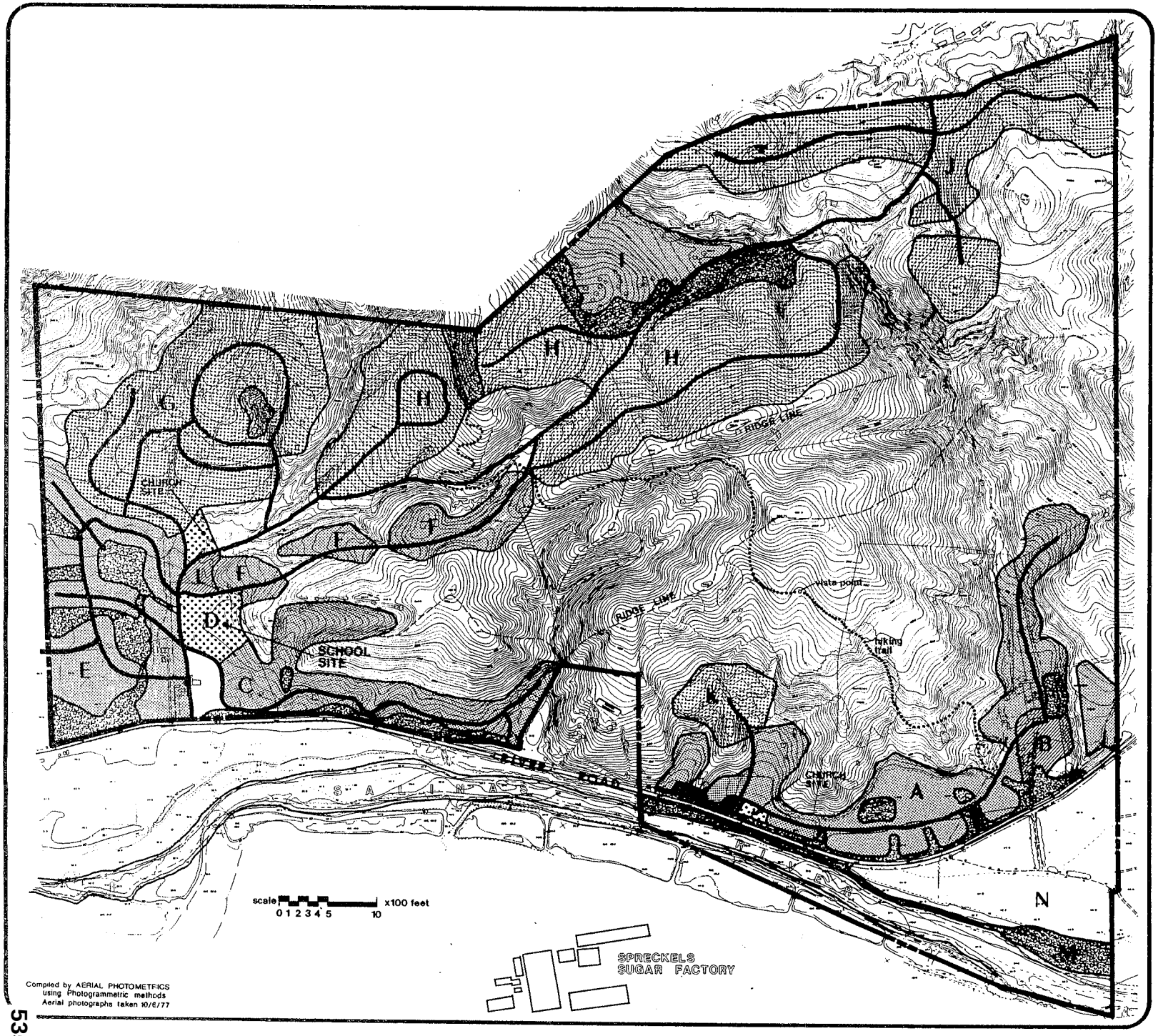
ADC Policy Plan Areas	Residential Units		Total Units	Other Land Uses	Other Acreage	Total Acres	Density Units/AC
	Multi	Single					
A	312	0	312			104	3.00
B	-	-	-	COMMERCIAL/RECREATIONAL	6	6	N/A
C	131	0	131			62	2.11
D	-	-	-	SCHOOL/CHURCH SITES	15	15	N/A
E	0	168	168			76	2.21
F	104	0	104			32	3.25
G	0	80	80			95	.84
H	0	142	142			152	.93
I	0	46	46			28	1.64
J	0	43	43			90	.48
K	0	5	5			11	.45
L	-	-	-	COMMERCIAL	6	6	N/A
				OPEN SPACE:			
M				RIPARIAN CORRIDOR	13		
N				AGRICULTURAL LAND	56		
O				NEIGHBORHOOD/INFORMAL OPEN SPACES	65		
				CENTRAL OPEN SPACE & FRONTAL SLOPES	767		
				TOTAL OPEN SPACE		901	N/A
TOTAL	547	484	1031			1579	.65 AV.

NOTE: ACREAGES BOUNDARIES OF THE PLAN AREA AND NUMBER OF UNITS WITHIN EACH PLAN AREA ARE APPROXIMATE. SPECIFIC BOUNDARIES, AND NUMBER AND MIX OF UNITS WILL BE DETERMINED AT THE TIME OF FINAL ENGINEERING, PROVIDED THAT THE TOTAL NUMBER OF RESIDENTIAL UNITS SHALL NOT EXCEED 1,031. DEVELOPMENT MAY NOT OCCUR IN THE APLHABETICAL ORDER IN WHICH THE PLAN AREAS ARE LETTERED ON THE PLAN.

Las Palmas Ranch

FIGURE E

SPECIFIC PLAN



Compiled by AERIAL PHOTOMETRICS
using Photogrammetric methods
Aerial photographs taken 10/6/77

Monterey County Planning Department

CHAPTER II

LAS PALMAS RANCH SPECIFIC PLAN

A. INTRODUCTION

1. The Value of Goals

The Las Palmas Ranch Specific Plan did not originate with county government. It began as the idea of a group of property owners who saw this large ranch being used to provide housing for the people of their community. Before their idea can achieve reality, however, it must be blended with the County's objective for development of the River Road area. The end product will be the Las Palmas Ranch Specific Plan, which will represent a joint expression of the aims and aspirations of the property owner, as well as the ends and objectives of the people of the County as declared by their local government.

This Chapter II is a statement of the aims and aspirations of the Specific Plan ("goals"); and the means by which the plan can achieve the goals ("policies").

Goals are necessry to give meaning to the short-and-long-term policies and actions called for by the Las Palmas Ranch Specific Plan. The goals set forth in this chapter are an essential expression of the commitment of the Las Palmas Ranch Partnership in connection with the development and management of their project. These goals ensure the protection of the major elements of the ranch's natural environment and rural setting, while at the same time providing a desirable residential community.

2. The Function of Policies

Policies are specific courses of action by which adopted goals are to be implemented.

The policies of this Specific Plan are intended to function as measures for the mitigation of potential environmental impacts of the project. They are also intended to serve as directions to the developer, the County staff and the public decision makers in the review and processing of the various phases of the project development. Where appropriate, policies of this Specific Plan will become conditions of approval of tentative maps and use permits.

Although the policies in this Chapter II are grouped under specific subject headings, a single policy may well serve to implement a number of goals. For example, policies stated under the agricultural land use, the design sensitivity and the erosion and drainage control sections also help to carry out the conservation and open space goal. The policies of this Specific Plan, therefore, should be considered as an integrated program of action for achieving the goals of the plan.

B. PHASING OF DEVELOPMENT

Residential development may proceed at a basic rate of up to 130 units per year. Up to 65 units may be built in addition to this basic yearly rate. Any units allowed in a year, but not built during that year may be built in following years. However, the accumulation of units shall not begin until the first residential unit is initiated.

It is important, however, to assure that adequate infrastructure such as water, sewers and roadway capacity is available or is made available to accommodate each increment of development as it is built. By the same token, the County needs to ensure that a proportionate amount of the total open space designated in this specific plan is provided at the time each phase of development commences. And although a given increment of the development may provide more or less than 15% of its housing units as low or moderate income units, it is essential that a schedule be adopted to assure that the committed number of affordable units will be provided in a reasonable and orderly progression and that the inclusionary units are not left to the end of the development or relegated to one or two isolated areas of the project.

C. HOUSING AND RESIDENTIAL LAND USE

GOAL: The primary goal of Las Palmas Ranch Specific Plan is to provide a broad mix of housing opportunities to all economic segments of the community without expanding existing urban boundaries into major farming areas.

BACKGROUND

According to the Monterey County Housing Plan, adopted by the Board of Supervisors on September 22, 1981, there is an immediate need within the County's unincorporated areas of 4,800 housing units by 1985. In order to meet this demand, the AMBAG Housing Study indicates a need for 1,000 units per year in the greater Salinas area.

Monterey County has adopted a Growth Management Policy which states in part that growth shall occur in or adjacent to urban areas or in areas specified for future growth which are able to provide urban services. The effect of this policy on the supply of housing is unknown because the implementation mechanism is yet to be adopted.

The Monterey County Housing Plan also points out the special housing needs of certain categories of households (large families, handicapped persons, the elderly, female-headed households and migrant farmworkers).

This Specific Plan responds to as many of these needs as is feasible.

The Las Palmas Ranch Partnership has entered into an agreement with the Monterey County Housing Authority to provide land in the City of Salinas at no

present cost to the Authority for the construction of fifty units of low-income family housing. The Partnership applied to the County to be allowed credit for these fifty units toward the Partnership's commitment to provide 15% of the units of Las Palmas Ranch as low or moderate income housing. On January 26, 1982 the Board of Supervisors approved these units as applying toward the inclusionary requirement.

OBJECTIVES

1. To help fulfill the continuing housing demands of the county as disclosed by the Monterey County Housing Plan and the AMBAG Housing Study.

2. To reduce the necessity for Salinas and other nearby communities to expand into surrounding major agricultural lands in order to meet housing demands.

3. To provide a range of housing affordable to all economic segments of the community.

4. To provide a full range of housing types within an environmentally sensitive plan.

5. To maintain the quality of the semi-rural residential environment.

6. To provide housing to meet the needs of the segment of Monterey County population that desires semi-rural living but with a full range of community facilities.

7. To consider the housing goals, plans and objectives of communities making up the County's housing market.

8. To explore and offer feasible, innovative methods of housing financing that will permit home ownership by a broad range of families.

POLICIES

1. The development of Las Palmas Ranch shall comply with the County's Inclusionary Housing Ordinance. Credit shall be given for the fifty units of low income family housing constructed by the Monterey County Housing Authority in the City of Salinas on the land provided by the Las Palmas Ranch Partnership.

2. All available sources of government and private financing and funding should be utilized for the construction of housing, including where appropriate the following:

U. S. Department of Housing and Urban Development, Federal Housing Administration;

U. S. Department of Agriculture, Farmers Home Administration, Home Ownership Loans Program, Rural Rental Housing Programs, Farm Labor Housing Loans Program, Water and Sewer Loans and Grants Program;

Economic Development Administration;

California Department of Housing and Community Development;

California-Housing Finance Agency;

Housing Assistance Council, Inc., Revolving Loan Fund;

Rural America, Loan Fund Policy.

3. To the extent feasible, low and moderate income housing should be disbursed throughout the project in order to minimize physical isolation and to promote social integration.

4. The appearance of the low and moderate income housing shall be compatible with other housing within the subdivision.

5. The Specific Plan allows a maximum 1,031 residential units in accordance with Figure D and Figure E.

6. Housing should be produced in an orderly phased program over a period of several years based upon market demands and availability of financing.

7. In order to preserve the semi-rural character of the area and to mitigate adverse impacts on significant viewshed areas, higher density housing should be clustered behind natural land forms, generally at lower elevations and not on steeper slopes or ridge lines.

8. An Inclusionary Housing Plan for the entire project shall be prepared by the developer reflecting compliance with the County's Inclusionary Housing Ordinance. This plan shall be submitted to and approved by the County prior to consideration of the first increment of residential development.

9. Recreational facilities and open space shall be provided on an incremental basis in accordance with project built-out.

10. Optional or modified public improvement, development, and construction standards where available should be utilized where appropriate to produce quality housing at reduced unit cost.

11. A Development Incentive Zone of ten acres shall be provided within the areas designated in this specific plan for medium density residential development. The density for this DIZ shall not exceed ten units per acre. This density may be and is encouraged to be dispersed throughout the medium density areas rather than being concentrated in a single ten-acre area.

D. COMMERCIAL LAND USE

GOAL: To provide twelve acres of centrally located commercial and service facilities appropriate to the convenience needs of the visitors and guests of Las Palmas Ranch as well as the residents of the entire River Road Area of Development Concentration.

BACKGROUND

At the present time, the only commercial outlet in the River Road ADC is a small, older convenience store across River Road from the entrance to the Pedrazzi subdivision. Although the Toro Area Master Plan designates a small area of commercial development at the corner of River Road and Pine Canyon Road, that land is presently in productive agricultural use and the likelihood is remote that the property will be developed for other than agricultural purposes in the foreseeable future, if ever. Consequently, residents of the River Road ADC must travel outside the vicinity for virtually all of their shopping needs.

The nearest complete retail and service facilities are in the City of Salinas, approximately three and one-half miles to the north. Limited convenience commercial outlets are located in Toro Park Estates, approximately two and one-half miles to the west of Las Palmas Ranch on Highway 68. A small amount of highway commercial development is called for in the Toro Vista Specific Plan, to be located on Reservation Road just west of Highway 68.

Although the residents in the Las Palmas Ranch development and in the River Road ADC should continue to look to the major commercial centers of Salinas and Monterey for the majority of their comparison goods shopping needs, the provision of convenience shopping outlets within the boundaries of the ADC would produce a number of public and private advantages. Such convenience outlets might include a "quick-stop" market with gasoline pumps, deli-liquor, barber/beauty shop, cleaners, and similar light retail shops. In addition to making shopping more convenient to the residents of the area, it would substantially reduce travel-based energy consumption, congestion on Highway 68 and resultant air pollution.

The Corey House, upon completion of its restoration, will function as a center for social and recreational activities of the residents of Las Palmas Ranch, and to a degree as a visitor attraction. it is appropriate to plan limited commercial facilities in and about the Corey House to meet the demand for dining and related activities. Furthermore, because this Specific Plan contemplates a concentration of recreational facilities around the Corey House for the utilization of the residents of the development and their guests, provision should be made for the availability of food, drink, recreational and athletic supplies and other similar goods in this vicinity. Commercial facilities around the Corey House might include a restaurant, sports shop, gift store, deli and similar uses.

In order to best meet the needs of all of the residents of the River Road ADC, the main body of commercial facilities should be centrally located. A

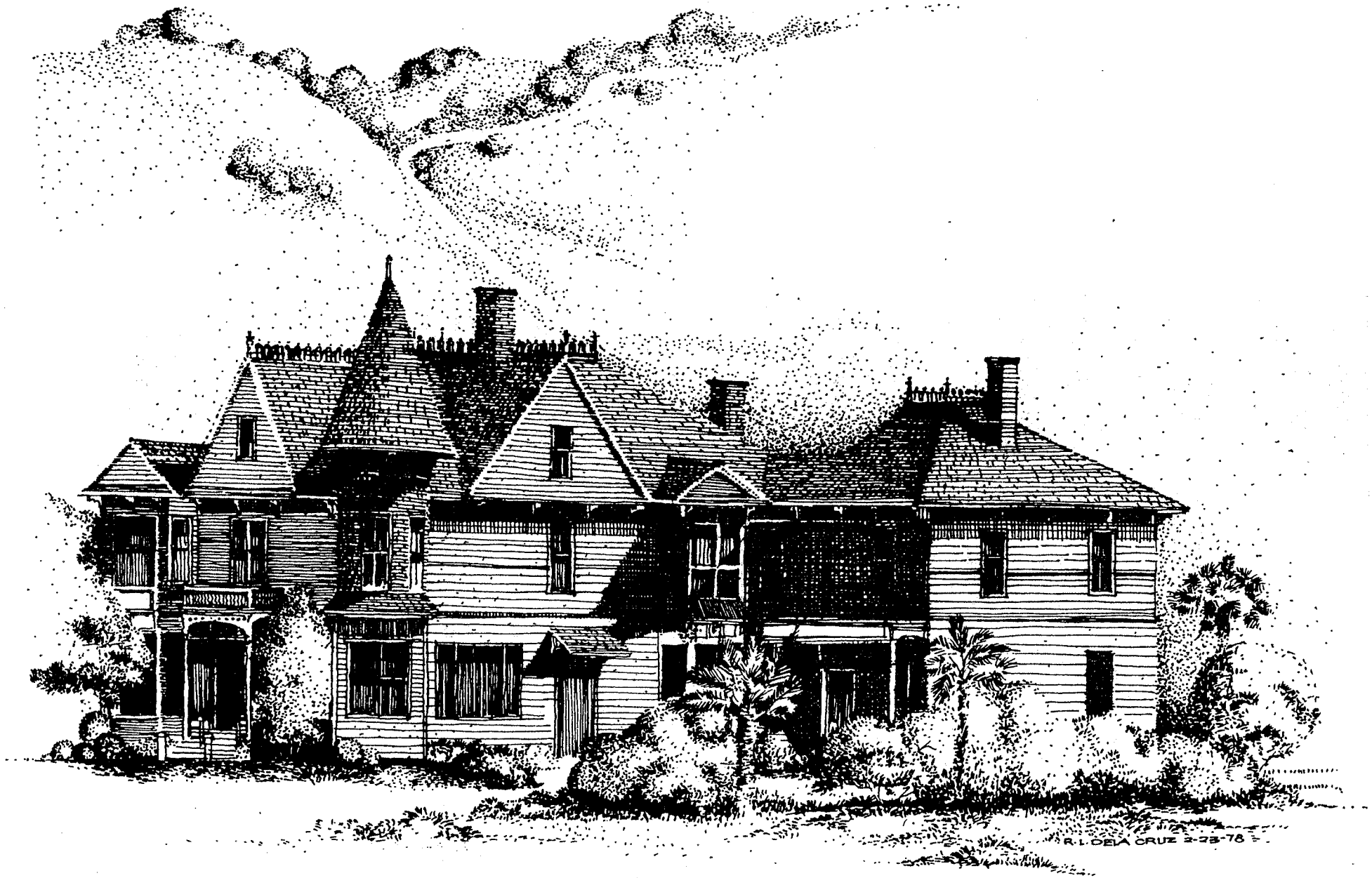


FIGURE F COREY HOUSE RESTORATION

location near the eastern end of the Las Palmas Ranch property would be centrally located to all existing and proposed development within the ADC.

OBJECTIVES

1. To develop a centrally located commercial and service area at the easterly end of Las Palmas Ranch to service the convenience shopping needs of the residents of Las Palmas Ranch and the River Road ADC.

2. To develop a small commercial and service facility in and about the Corey House to meet the convenience needs of visitors to the Corey House and those utilizing the recreational facilities in and about the Corey House.

POLICIES

1. Retail commercial and service facilities appropriate to meet the convenience shopping needs of the residents of Las Palmas Ranch and the River Road ADC should be provided in the area designated as "L" in Figure D.

2. Retail commercial and service facilities appropriate to the convenience needs of the visitors to the Corey House and those utilizing the recreational facilities in and about the Corey House should be developed in the area designated as "B" in Figure D.

3. All commercial development shall be of a size, design and intensity compatible with the semi-rural character of the River Road ADC.

4. The design, lighting and materials of all commercial signing for the development shall be carefully regulated to assure compatibility with the semi-rural character of the area.

5. All areas proposed for commercial development should be placed in Planned Commercial ("PC") or similar zoning providing for continued regulation by the County of uses, design, parking, landscaping and signing.

E. CIRCULATION

GOAL: To provide a safe, efficient and aesthetically pleasing system for the circulation of automobiles, pedestrians and other modes of transportation within the project; and to consider the reasonable needs for travel to and from the project.

BACKGROUND

Circulation concerns for the Las Palmas Ranch fall into two principal categories: (1) The internal provisions for circulation within the project itself, and (2) the external matter of travel to and from the project. The former is primarily within the purview of the developer's responsibilities; the latter, although a matter

of concern to this project, is primarily a problem for regional or even state solution.

The internal circulation system for Las Palmas Ranch will consist of two major collector roads. The collector serving the western portion of the project will enter River Road approximately at the Corey House. The collector serving the eastern portion of the project will enter approximately two miles further down River Road (see Figure D).

Neighborhood subcollector streets and lanes are designed to provide safe and efficient access to all portions of the project while maintaining a sense of separation and independence for the various residential neighborhoods.

This Specific Plan anticipates extensive use of optional design and improvements standards as provided by the Monterey County Subdivision Ordinance in order to maintain a rural character and enhance the liveability, convenience and appearance of the development. Although it is proposed to observe county standards as to materials, minimum lane width and longitudinal grades, optional standards are proposed as to maximum cul-de-sac length, width of right of way, and use of curb and sidewalk. These reduced standards will be offset in some cases by the generous provision in the plan for off-street parking and by the use of turnouts and turnarounds for emergency equipment.

All development costs of the on-site circulation network will be funded by the developer (see Chapter IV). It is proposed that the major collector roads and subcollector streets in the higher density areas will be dedicated public streets. Private roads may be utilized for some of the larger lot single family development, and for the interior lanes within PUD clusters.

Provision will be made within the project to accommodate alternative means of transportation to the automobile. A system of pathways suitable for pedestrian and bicycle use will connect the residential areas with commercial, educational and recreational centers. Although public transit does not presently serve River Road, it is expected that such service will be provided as development of this project and Toro Vista proceeds. Safe, centrally located bus loading areas for both public transit and school buses are proposed for both the western and the eastern portions of the project.

OBJECTIVES

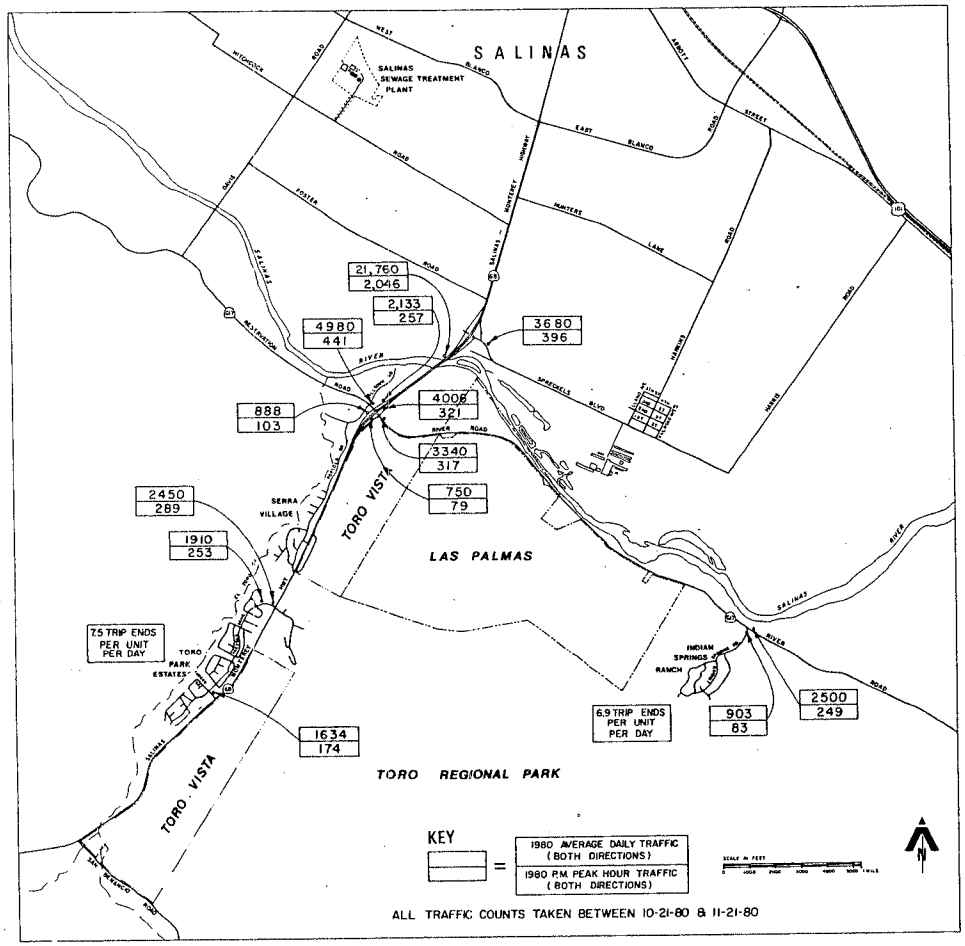
1. Provide an internal circulation system of collector roads and neighborhood collector streets and lanes providing safe, efficient and aesthetically pleasing access to the areas of development for automobiles, pedestrians and alternative modes of transportation.

2. Provide or participate in the provision of off-site improvements reasonably necessary to assure safe travel to and from the project.

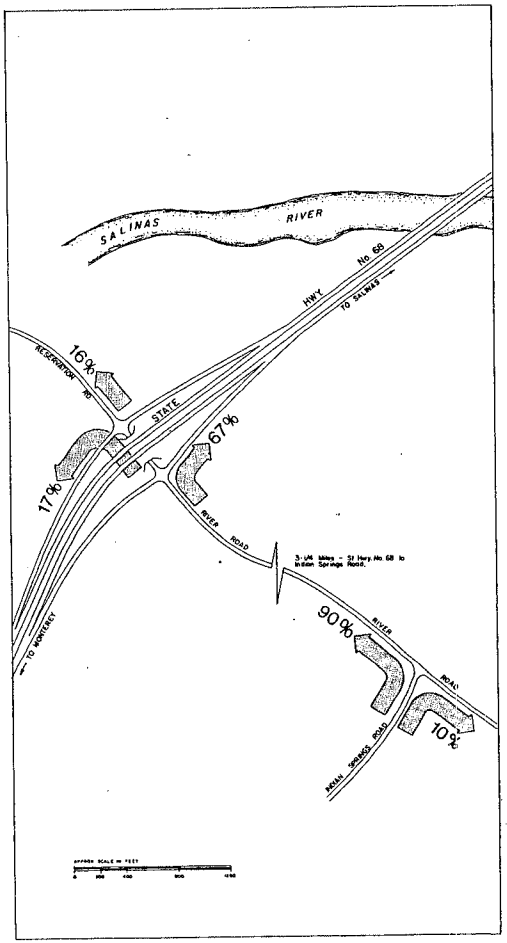
Las Palmas Ranch

FIGURE G

1980 TRAFFIC VOLUMES AND DIRECTIONAL SPLIT DATA



October 1980 Traffic Counts



Directional Split Data For Indian Springs Morning Peak Period Traffic

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POLICIES

1. Provide a system of pathways suitable for pedestrian and bicycle use to connect residential areas with commercial, educational and recreational areas of the project.

2. Safe, attractive and centrally located loading areas for school buses and public transit should be provided at appropriate locations in both the east and west areas of the project as determined by consultation with transit agencies.

3. Adequate off-street parking should be provided as a means of reducing road congestion, particularly in areas where reduced road right-of-way is proposed.

4. Turnouts and turnaround facilities may be required to accommodate emergency vehicles in areas of reduced road right-of-way or where longer cul-de-sacs are proposed.

5. Interior roads shall have longitudinal grades not exceeding 15%.

6. With the following exceptions, on-site roads shall be privately owned and maintained.

A. Extensions of existing public roads. Such connections and extensions shall be publicly owned and maintained.

B. Subdivision roads maintained by user fees or other locally-generated revenues, and not by the county road fund. Such roads may be publicly owned.

7. The internal circulation system should be designed to accommodate a level of service "C" at full buildout. A trip generation factor of 8.0 trips per day per unit shall be used for this project.

8. The use of optional design and improvement standards is encouraged for the internal road system to reduce visual impacts, maintain a rural character and enhance the liveability, convenience and appearance of the project. Subject to specific review in each case, such optional standards shall permit extended cul-de-sac length and elimination or reduction of curbs and sidewalks, and may permit reduced right-of-way.

9. Roads which are perpendicular to viewing areas of which involve excessive cut and fill shall be discouraged.

10. Horizontal and vertical street alignments should relate to the natural contour of the site insofar as is practical, while retaining safe sight distance for expected driving speeds but not less than 25 mph.

11. Street name signs and regulatory devices constructed of wood or other natural materials and of the size and height compatible with the surroundings should be utilized.

12. The developer shall dedicate fee title along the project frontage on River Road so that the sum of the width of existing right-of-way and new dedication (on either side) equals 110 feet. Widening in excess of 110 feet may be required for slopes. These slopes may be provided for as slope easements and may be landscaped by the developer and included as part of the meandering 50 foot setback/landscaped area described in Conservation and Open Space Policy #9.

13. Access to the development will be by public road intersections including left turn channelizations constructed by the developer on River Road at the entrances to the subdivision. Design and construction shall be compatible with the widening of River Road as contemplated by Policy #12 above.

14. Internal road connections should be provided where feasible between the areas of the subdivision in order to minimize the need for River Road to provide a route for intra-subdivision traffic.

15. Road connections should be provided where feasible between the subdivision and adjacent subdivisions in order to minimize the need for subdivision traffic to utilize River Road.

16. The developer shall pay a development fee to the County for improvements to Highway 68. This development fee shall be $620.75 per residential unit (a total of $640,000.00, being 10.66% of the estimated cost of the two lane first phase of the Corral de Tierra bypass), and shall be payable as to each residential unit at the time the building permit for the residence is issued.

17. The maximum contribution to improvements to River Road shall be $1,400,000 (prior to indexing). This contribution shall be for a project to be designated by the County Public Works Department. A payment of 1/1031 of this amount shall be paid to the County at the time each residential building permit is issued. When 600 such permits have been issued the designated road improvement project shall be built. If the accumulated contributions are insufficient to fund the project, the developer shall then contribute the balance of the cost up to the above maximum obligation.

18. The development contributions provided in Policies 16 and 17 are based on 1983 dollars, and will be adjusted annually in accordance with the West Coast Engineering News Record General Engineering Cost Index. These development contributions, together with the dedications and improvements required by Policies 12 and 13 shall constitute the project's total required participation in the construction or financing of off-site roads and circulation facilities.

F. CONSERVATION AND OPEN SPACE

GOAL: To conserve and protect in open space those aspect of Las

Palmas Ranch that constitute the major visual and environmental resources of the site; and to provide for the managed utilization of open space for active and passive recreational purposes.

BACKGROUND

Open space is an essential component of any well-designed residential project. It provides areas for active and passive recreation immediately adjacent to dwelling units. It increases project amenity by providing landscaped areas and important scenic vistas. Open space can be an important design element, breaking up monotonous patterns of housing and improving the visual attractiveness of the development. Open space increases design flexibility and permits the preservation of natural features for even greater amenity.

By statutory definition open space includes banks of rivers, riparian vegetation, watershed lands, outdoor recreation areas, areas of outstanding scenic, historical and cultural value, and areas of economic importance used for production of food and fibre.

A number of these open space components are found within Las Palmas Ranch and are therefor incorporated in this Specific Plan.

The first component of the Las Palmas Ranch open space includes the banks of the Salinas River and the narrow band of riparian vegetation adjacent thereto. These areas constituting the northerly boundary of Las Palmas ranch, will be left in their natural state and retained in the ownership of the developer.

The second open space component of Las Palmas Ranch is the approximately 50 acres of level land lying between the riparian corridor and River Road. This area will be preserved in agricultural use.

This agricultural land shall be placed in permanent agricultural zoning. It will remain in the ownership of the developer or a successor entity, and will be leased for farming purposes.

The Corey House itself and the grounds around it constitute the third component of the Las Palmas Ranch open space. The developer has already restored the exterior of this magnificent structure, and has had the building placed on the roster of National Historical Buildings. The Corey House is suitable for a variety of active uses; as a social center for the project and headquarters for the recreational complex around it; as a center for retail commercial and service facilities to meet the needs for those utilizing the recreational facilities and visitors to the historic residence. The Corey House itself will remain in the ownership of the developer, with space being leased to the various users including the owner's association. The recreational facilities surrounding the Corey House will be owned and managed by the owners' association for the use of the project residents and their guests.

By far the largest of the open space components, consisting of approximately 767 acres, is the central open area embracing the central ridge lines and north-facing frontal slopes visible from the Highway 68 Scenic Corridor (see Figure H). This area constitutes the major watershed area of the ranch as well as the prime visual resource visible from within the ranch and from the Highway 68 Scenic Corridor. This area should provide an excellent source of active and passive enjoyment for the residents of Las Palmas Ranch (see discussion in Section H of this Chapter II). This plan calls for this area to be left basically in its natural state. Improvements will consist only of trails, vista points and drainage and erosion control devices. This central open area will be owned and managed by the master owners' association, and should be placed in open space zoning and subjected to appropriate scenic easements.

The final component of open space in the Las Palmas Ranch project includes the smaller parks and recreational areas which are interspersed within and among the clusters of higher density development. Some of these areas are shown in Figure D. Others will be designed as each increment of cluster development is proposed. These areas will be owned and managed by the neighborhood or village owners' association. The utilization of these neighborhood open spaces as a means of separating housing clusters and providing visual screening is illustrated in Figure K.

OBJECTIVES

1. To preserve the site's major frontal slopes and ridgelines in open space in order to maintain the rural setting as a visual backdrop to the clustered housing.

2. To provide for continued agricultural use of lands north of River Road.

3. To maintain a feeling of open space along the immediate River Road corridor.

4. To conserve the Salinas River bank and the adjoining riparian vegetation in open space.

5. To preserve and enhance the historical significance of the Corey House.

6. To utilize open space as an important design element for avoiding monotonous patterns of development.

7. To provide for active and passive enjoyment of the open space within the project.

8. To assure open space integrity through ownership and management entities.

POLICIES

1. The following constitute the open space elements of Las Palmas Ranch to be protected:

A. The Salinas River bank and the riparian vegetation adjacent thereto;

B. The agricultural land north of River Road;

C. The central ridge lines and north-facing frontal slopes visible from the Highway 68 Scenic Corridor as delineated on Figure H.

D. The Corey House.

2. Prohibit building on ridgelines visible from designated scenic corridors, as delineated on Figures H and K.

3. Higher density housing units shall be clustered behind natural landforms or on lower elevations.

4. Open space areas shall be placed in scenic easements and open space zoning or otherwise adequately protected from development that could destroy the natural amenities of the site.

5. The open space areas other than the riparian corridor, the agricultural land and the Corey House shall be conveyed to an owners' management association or other appropriate entity legally empowered and obligated to manage these areas and to collect fees or assessments therefor.

6. A proportionate amount of open space should be provided with each increment of housing. Trails provided within the open space management plan shall be dedicated at the time the area is unencumbered and the open space is dedicated.

7. Roads which are perpendicular to viewing areas or which involve excessive cut and fill shall be discouraged.

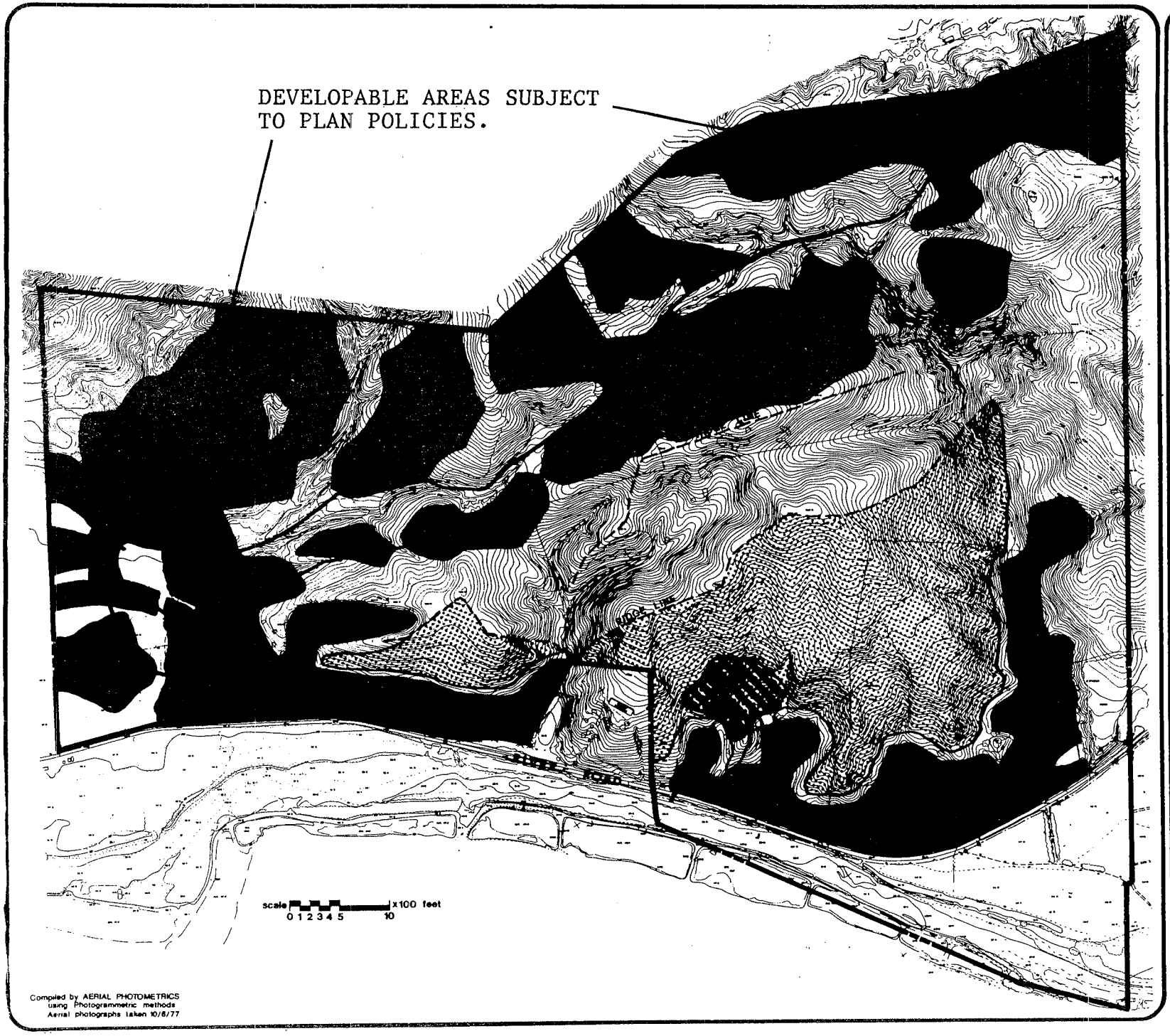
8. Horizontal and vertical street alignments should relate to the natural contours of the site insofar as is practical.

9. An irregular or meandering landscaped setback, with a minimum depth of fifty feet, shall be established along the frontage of River Road.

10. Utilize mounding, informal massing, or irregularly spaced trees, planting and other overall landscaping treatment to screen development.

11. Visually obtrusive building materials and finishes shall be avoided.

12. Erosion, siltation and drainage controls shall be implemented in order to enchance watershed management, to protect on-site and riparian vegetation, to



Las Palmas Ranch

FIGURE H

FRONTAL SLOPES

FRONTAL SLOPES VISIBLE FROM SCENIC HIGHWAY

Monterey County Planning Department

facilitate on-site retention and percolation of surface water, and to minimize hazards to development.

13. Facilities providing for active and passive recreational uses of the open space areas may be provided subject to County approval.

A. Such facilities may include hiking, jogging, and equestrian trails and vista points within the central hillside open spaces.

B. Tennis and racquetball courts, swimming pools, play fields, health club facilities, and similar more intensive recreational facilities may be located in the areas designated in Figure E for recreational uses.

C. Mini-parks, jogging trails, playgrounds, swimming pools, tennis courts, and similar facilities may be located within the smaller open space areas interspersed among the residential clusters.

D. Recreational facilities shall be managed and maintained by an owners' management association or other appropriate entity legally empowered and obligated to manage these areas and to collect fees or assessments as necessary for their maintenance.

E. A comprehensive Open Space/Recreation Management Plan for all open space areas of the project, shall be prepared by the developer indicating how the open spaces within the project will be used, managed and conserved. This program shall be submitted to and approved by the County prior to final discretionary approval is given by the County for any portion of the development authorized by this specific plan.

14. The central open space areas of the project south of River Road may be utilized for wastewater treatment and disposal when consistent with the approved Open Space/Recreation Management Plan and the approved Wastewater Management Study.

G. ENERGY CONSERVATION POLICIES

1. Each residential unit should be afforded adequate solar access for the operation of active and passive solar systems. Locating structures with their major axis oriented within 22.5° of true east/west is generally the best means to insure adequate south-facing solar access. For single-family homes, the orientation is fairly simple to implement as is full access to the south wall for passive solar design. For multi-family units, orientation and access are more difficult; generally south roof access for active space heating or domestic water heating systems is considered sufficient.

2. Careful design of structures to utilize solar access and to control heat loss and heat gain can achieve significant energy conservation. When these design elements are coupled with passive design features (thermal storage units, south facing glass, domestic hot water systems and other energy conserving components),

the energy conservation potential greatly increases. Support structures built by the developer such as commercial areas, swimming pools, recreation and community buildings should make maximum use of alternate energy sources both to reduce operation costs and to serve as community examples.

3. The addition of pedestrian and bicycle paths to the internal circulation systems could further reduce the need for automobile use.

H. PRESERVATION OF SIGNIFICANT AGRICULTURAL LAND

GOAL: To preserve and protect significant major areas of prime and productive agricultural land.

BACKGROUND

In Monterey County's unincorporated areas, agriculture is by far the most predominant land use. The Salinas Valley contains some of the finest agricultural soil in the world, and is one of the only areas in the United States with a large level area of highly productive soils, as well as ocean fog which is so desirable for succulent vegetables. Historically, agriculture has been the greatest single source of income in the County of Monterey.

As the population of the County has continued to increase over the years, it has become increasingly apparent that this agricultural base of the economy must be protected, while accommodation is made for anticipated growth. Consequently, the County's plans are replete with policy statements attempting to balance these potentially conflicting interests.

As thus proposed, this Specific Plan is consistent with the agricultural land preservation policies of the Monterey County General Plan and the Toro Area Master Plan.

OBJECTIVES

1. To provide for permanent agricultural use of lands north of River Road and to preserve them in open space.

2. To relieve pressure for residential land use on intervening prime agricultural lands in the area south and southwest of the City of Salinas and north of the Salinas River (the Blanco Area).

3. To accommodate the foreseeable housing demand within the River Road ADC, utilizing a compact residential land use pattern.

4. To direct residential expansion into the non-agricultural belt along the foothills.

POLICIES

1. Preserve the agricultural lands north of River Road in agricultural zoning and in a permanent agricultural open space easement.

2. Retain the lands north of River Road in agricultural production.

I. DESIGN AND SENSITIVITY

GOAL: To provide a program of design standards and regulation to assure that all structural development at Las Palmas Ranch will be aesthetically pleasing, internally consistent and visually integrated with the natural surroundings including major open spaces.

BACKGROUND

Section E of this Chapter II identifies the significant open space elements of the Las Palmas Ranch site. The policies enunciated in that section provide for the appropriate placing of concentrated development on the site consistent with the conservation of these major open space elements.

The design of the roads, buildings, and other facilities is equally as important to the overall visual impact of the project as is the location of development. This section establishes the policy framework for the design of such improvements.

The primary design consideration shall be the creation to the extent possible of a "rural" or "country" atmosphere within the development. Too often "rural" or "country" is equated mistakenly with rambling ranch-style homes on large lots; yet most residents in concentrated housing in the unincorporated areas (for example, San Benancio Village, The Bluffs, Del Mesa Carmel) feel that they live in the "country" and that their development is "rural." An analysis of such projects, both in Monterey County and elsewhere, discloses a number of common design features which help to create the "rural" or "country" atmosphere:

- Sensitive design of buildings emphazing the relationship of buildings to natural land forms and utilizing nonobtrusive natural materials such as wood and native stone, and low intensity exterior colors.

- Clustering of buildings in curvilinear patterns inerspersed with open spaces.

- Landscaping which follows "natural" patterns, i.e., irregular shapes and mounded surfaces, informal massing, or irregularly spaced trees and plantings.

- Preservation of mountains, hillsides and significant woodlands or farm areas which can be seen from the development areas creating a sense of closeness to major open spaces.

- Public improvements which reflect a "country" rather than a "city" atmosphere, e.g., meandering walkways of natural materials rather than curbs and sidewalks; exterior lighting including street lighting controlled as to intensity and direction; traffic, directional and other signing made of wood and without interior lighting.

- Availability of active and passive recreational opportunities not available in the city.

OBJECTIVES

1. To mitigate adverse visual impacts of the proposed development upon significant open space and viewshed areas.

2. To create to the extent possible a visual sense of "country" living within the development.

POLICIES

1. All areas of the project proposed for structural development shall be placed in a site and design control district to ensure county enforcement of the design policies of this specific plan.

2. The deed restrictions for the project shall provide for the master homeowners association to have architectural and site review authority to enforce the design policies of subdivision deed restrictions. This authority shall be in addition to the design control authority of the County. Adoption of this Specific Plan shall not be construed as an obligation on the part of the County to create or enforce homeowner association rules.

3. All structures, including residential, commercial, recreational and accessory buildings; fences; walls; decks and signs shall require design approval. Approval shall be based upon conformity with the policies of this plan as well as the following specific criteria:

A. Compatability of external design, materials and colors with existing structures in the development and with the semi-rural setting.

B. Conformity of design and location of structures with respect to existing ground elevations and natural land forms.

C. Mitigation of visual impacts visual from within the development and from major designated view corridors outside of the project.

D. Protection of significant trees and vegetation. Trees over 36" in circumference (four feet above the ground) shall be retained. Where it is necessary to remove such trees for better design or layout, then they shall be replaced on a two for one basis subject to the approval of the Director of Planning.

E. Prevention of erosion, sedimentation and visual impacts resulting from grading, excavation, cutting or filling.

4. To the extent feasible, all structures should utilize natual materials such as wood and native stone and low intensity earth-tone exterior colors. Visually obtrusive building materials shall be avoided.

5. Low level exterior lighting, including street lighting shall be utilized consistent with maintenance and public safety and shall be unobtrusive, harmonious with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. Street lights may not be used unless approved as conditions of permits obtained pursuant to this plan.

6. Horizontal and vertical street alignments should relate to the natural contours of the site insofar as is practical. Roads which are perpendicular to viewing areas or which involve excessive cut and fill should be discouraged.

7. Mounding, informal massing, or irregularly spaced trees, planting and other overall landscaping treatment should be utilized to screen development.

8. Preserve vegetation significant to the maintenance of visual quality and to the provision of erosion control on sensitive slopes.

9. Where possible consistent with public safety, alternative public improvement standards should be applied by the county to reduce visual impacts and add to the rural character of the development. Such alternative standards may allow, where appropriate:

A. Reduced graded section of roads.

B. Elimination of sidewalks or utilization of meandering pathways of natural materials in the place of sidewalks.

C. Elimination of curbs or utilization of berms or vee gutters in the place of curbs.

D. Extended cul-de-sacs rather than looped roads.

E. Street lights at greater intervals; street lights of lower intensity; and street lights on ground level standards.

F. Street name signs and regulatory devices constructed of wood or other natural materials and of a size and height compatible with the surroundings.

10. All new utilities shall be placed underground.

11. No development shall be allowed on slopes over 30%, except where necessary for construction of limited portions of roads following existing ranch roads, serving the development areas shown on Figure F; or where necessary to

maximize the goals, objectives and policies of this Plan and the Monterey County General Plan.

J. EROSION, DRAINAGE AND FLOOD CONTROL

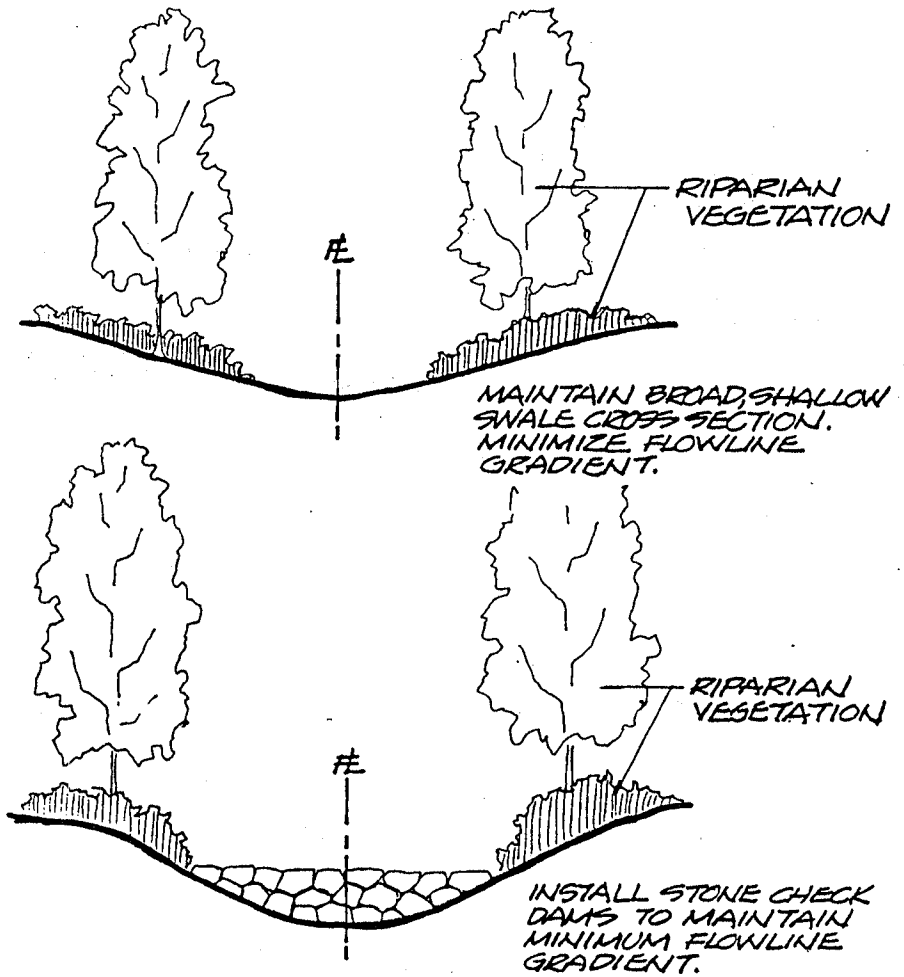
GOAL: To minimize erosion, siltation and sedimentation, and to protect on and off site areas from damage, through an integrated watershed management and flood control program.

BACKGROUND

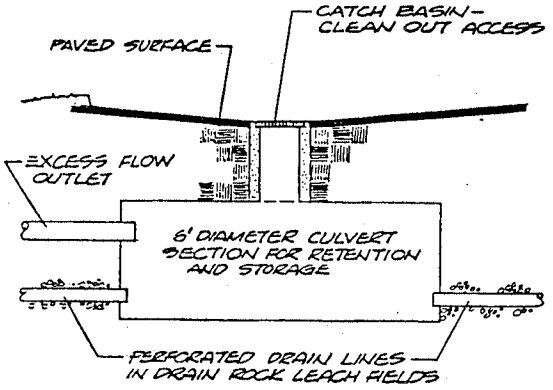
In November of 1980, Cooper and Clark, consulting engineers, published their report entitled "Phase I - Geologic Reconnaissance and Geologic Hazards Investigation - Las Palmas Ranch." The report provides detailed information relative to existing site conditions and the erosion potential of the Las Palmas Ranch property. The full report is on file with the County of Monterey. Figures I and J, reproduced from that report, show the topography and geologic units within the property.

According to the Cooper and Clark report, the Las Palmas Ranch contains three principal drainage systems. The westerly boundary of the property is drained by a system terminating near the Corey House. A second drainage system terminates in the central portion of the site, across from the Spreckels Sugar Factory. The third drainage system exists in the southeast portion of the site. The report indicates that the site vegetation consists of open grass-covered slopes with scattered growths of trees. Soil cover is widespread with sparse bedrock outcrops. Moderate to severe erosion is presently occurring along the drainage areas.

Analysis of the Cooper and Clark report by the project engineers and the project landscape architect indicates that the installation of erosion control devices such as slope planting and other landscaping, desilting basins, check dams and retention basins, could increase the times of concentration and thereby reduce the expected peak runoff volumes. Such a program could not only prevent further contamination of the Salinas River, but actually decrease the amount of sediments presently reaching the river. An erosion and drainage control program embodying these principles has been developed for the project by means of which erosion, siltation, sedimentation and drainage controls will be implemented in accordance with the Monterey County Master Drainage Plan.



DRAIN SWALES AND CHECK DAMS
NO SCALE



LENGTH OF CULVERT STORAGE SECTION WOULD VARY ACCORDING TO CAPACITY REQUIREMENTS DETERMINED BY AREA OF PAVED SURFACE TO BE DRAINED.

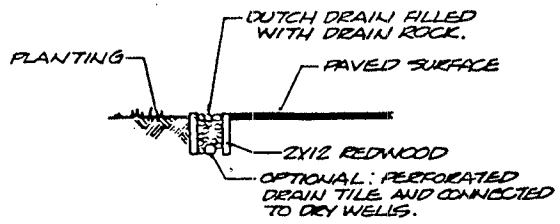
UNDERGROUND STORAGE/RETENTION
NO SCALE

Las Palmas Ranch

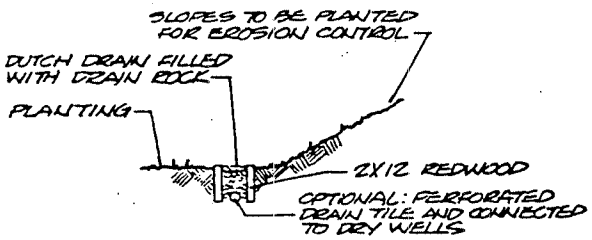
FIGURE I

EROSION AND DRAINAGE CONTROL CONCEPTS

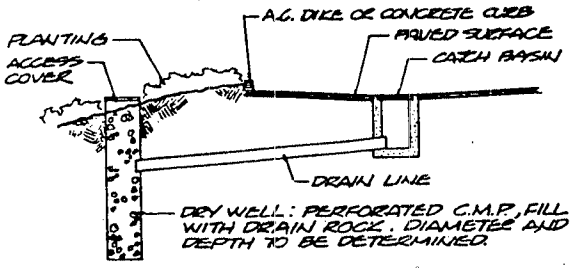
Monterey County Planning Department



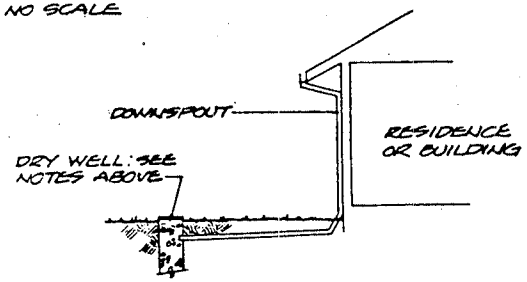
DUTCH DRAIN AT PAVED AREAS
NO SCALE



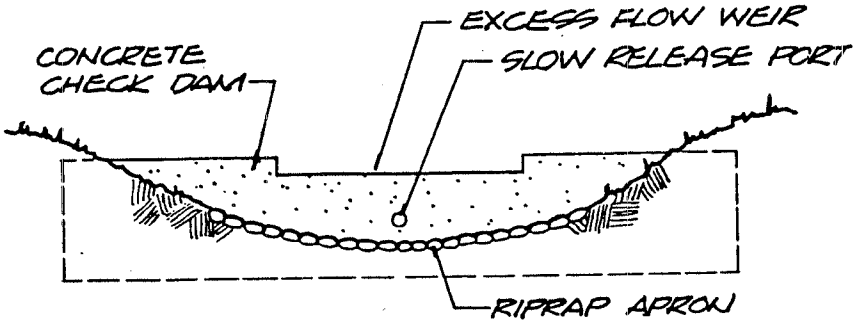
DUTCH DRAIN AT TOE OF SLOPES
NO SCALE



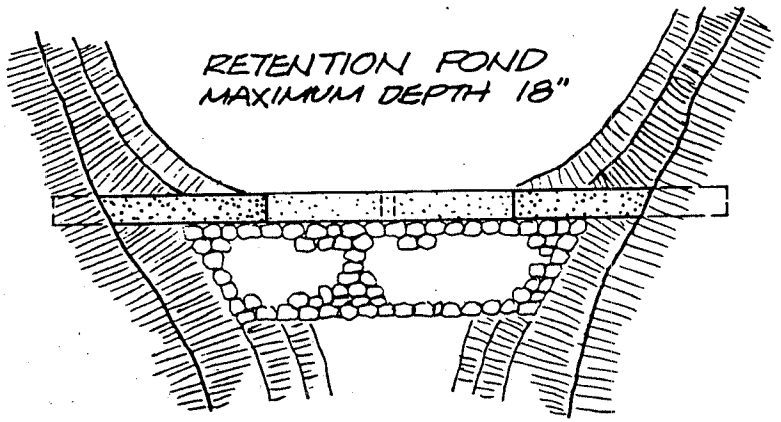
DRY WELLS AT PAVED AREAS
NO SCALE



DRY WELLS AT DOWNSPOUTS
NO SCALE



ELEVATION



PLAN

CHECK DAM AT RETENTION PONDS
NO SCALE

Las Palmas Ranch

FIGURE J
EROSION AND DRAINAGE CONTROL CONCEPTS

Monterey County Planning Department

OBJECTIVES

1. To protect on and off site areas from adverse effects of erosion, siltation and sedimentation.

2. To retain or percolate surface water on site to the maximum extent feasible.

3. To protect development from any adverse impacts from potential flooding of the Salinas River.

POLICIES

1. A comprehensive drainage plan for the entire project shall be prepared by the developer, and submitted to and approved by the County prior to final discretionary approval is given by the County for any portion of the development authorized by this specific plan.

2. Minimize alteration of natural drainage systems described in the Cooper and Clark report.

3. provide drainage reports for each phase of development showing all tributary areas and information pertinent to the capability of storm water detention and silt control facilities and mitigations for such identified impacts will be implemented.

4. Provide storm water detention/siltation ponds so that the flow rate from development will not exceed that from the tributary areas in its natural state during a ten year design storm.

5. Maintain and protect all natural streams or drainage corridors from development encroachment and where necessary make improvements to flowline gradients and to unstable side slopes.

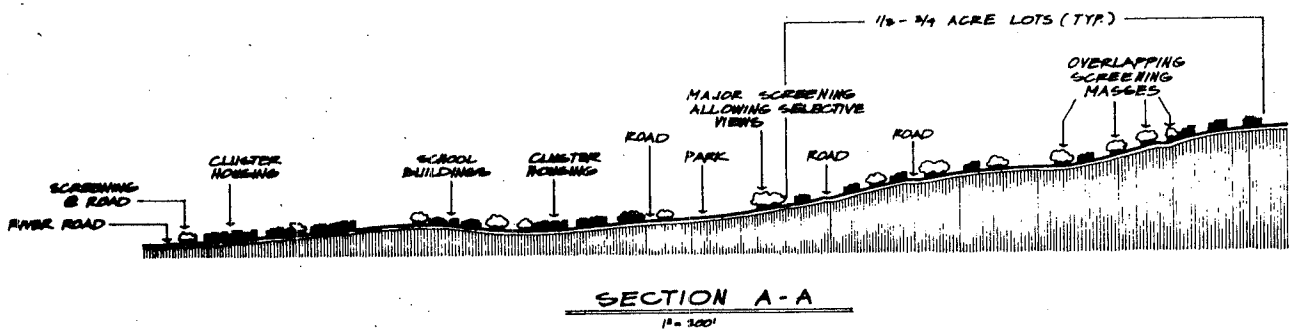
6. Plant all drainage ways with riparian vegetation to control downstream concentration of runoff, to promote upstream retention and to sustain streamflow over a longer period of time.

7. Minimize disturbance or removal of existing vegetation, including trees, shrubs and grasses or other ground covers.

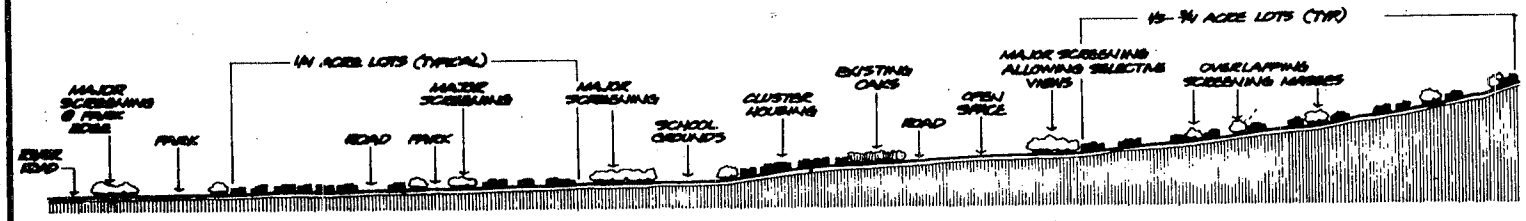
8. Provide engineering plans with each phase of development demonstrating that cut and fill slopes can be stabilized; the specific method of treatment and type of planting by area for each soil type and slope required to stabilize cut and fill slopes; and the time and amount of maintenance required to stabilize cut and fill slopes.

Las Palmas Ranch

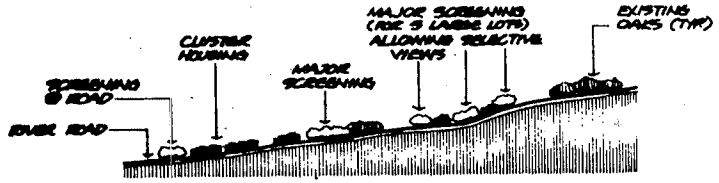
FIGURE K
CONCEPTUAL CROSS SECTIONS, NEIGHBORHOOD OPEN SPACES



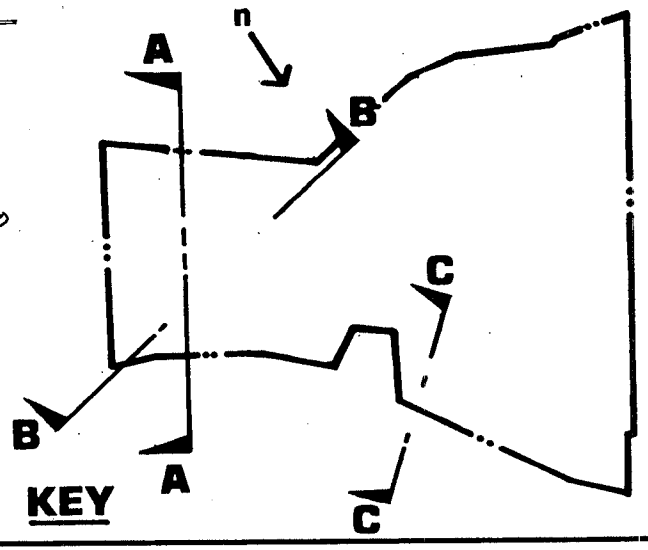
SECTION A-A
1" = 200'



SECTION B-B
1" = 200'



SECTION C-C
1" = 200'



Monterey County Planning Department

9. All graded areas of street rights-of-way shall be planted and maintained to control erosion. The area planted shall include all shoulder areas and all cut and fill slopes.

10. Require careful stockpiling of top soil to provide an adequate supply for placement on all graded or distrubed areas to ensure good plant growth for erosion control.

11. Maintain temporary erosion controls during construction. Improvement plans shall include a plan and implementation schedule of measures for the prevention and control of erosion, siltation and dust until erosion control plantings become established.

12. An owners management association or other appropriate entity shall be formed which is legally empowered and obligated to manage and maintain drainage and erosion control areas and facilities not owned or maintained by public agencies, and to collect fees or assessments therefor.

13. Provide drainage devices where controlled storm drainage is necessary.

14. Provide storm drainage retention devices and enlarge dissipators to reduce runoff in development areas so that the flow rate from development will not exceed that from the tributary area in its natural state during a ten-year storm.

15. Protect areas of potential aquifer recharge through the proper utilization of drainage facilities, open space and permeable materials.

16. Conform to State and County health standards for utilization and distribution of waters.

17. All storm water drainage facilities shall be constructed so as to outlet directly into the Salinas River under full flood conditions.

18. The developer shall:

A. Improve downstream drainage structures sufficiently to pass existing 10 year frequence flows through to the Salinas River.

B. Delineate the 100 year floodway and floodway fringe on the subdivision map based on the 1980 FEMA Flood Insurance Study or such maps as may update existing flood hazard area studies.

19. No development shall occur in the floodway and structures built in the floodway fringe shall be flood-proofed.

K. PUBLIC FACILITIES AND SERVICES

GOAL: To provide appropriate levels of public facilities and services to serve the higher intensity land uses proposed for the Las Palmas Ranch.

BACKGROUND

The Monterey County Growth Management Policy states that areas of higher density development must provide appropriate levels of public services, such as water, sewage disposal, roads, schools and fire protection.

Public service concerns associated with the Las Palmas Ranch project include both capital improvement, or one-time infrastructure needs; and on-going operating needs.

Since the passage of Proposition 13 there have been great changes in the manner in which public services are provided. While property taxes and general fund monies were the principal source of funding in the past, direct developer installation of on-site infrastructure in conjunction with development fees and assessments is now the norm.

The county will look to the developer of Las Palmas Ranch to be the prime mover in making the necessary public services and facilities available. In some cases, such as the waste water treatment system, this will require creating a system where none now exists. In other cases, such as the water system, schools and fire protection, it may mean meeting demands for increased capability of existing delivery systems.

The purpose of this section of the plan is to establish what public facilities may be needed to accommodate the development of Las Palmas Ranch, and when and in what form they should be provided. Various means of financing initial construction and on-going operation are discussed in Chapter IV.

1. WATER

Fortunately the River Road area is blessed with an abundance of good quality water.

Las Palmas Ranch is located entirely within Monterey County Flood Control and Water Conservation District Zones 2 and 2A. In a report to the Board of Supervisors on June 23, 1981, Robert Smith, District Engineer for that district, confirmed that water adequate for all proposed development in the River Road ADC area is readily available. Smith stated further that the proposed levels of development in the River Road ADC area do not pose any threat of degradation to the groundwater of the area. Consequently, this section of the specific plan will discuss only the proposed water delivery system.

Some smaller water systems in parts of the Toro Area have suffered from under-capitalization and piecemeal expansion. In contrast, one of northern California's largest and most reliable water utility companies, California Water Service Company, presently serves the River Road area and is ready and able to extend service to Las Palmas Ranch. Their system will provide both domestic and fire flow services to this project in accordance with the requirements of county and state regulatory agencies. If for some unforeseen reason California Water Service Company would not extend service to Las Palmas Ranch, adequate water can be developed easily from on-site wells to meet all state and county requirements through an incorporated mutual water company.

POLICIES

1. As the first priority the entire development must be served by a public utility water company providing domestic and fire flow in accordance with the requirements of State and County health and fire agencies. If a public utility water company satisfactory to the County is not feasible, then an incorporated mutual water company may perform this function.

2. Availability of water meeting the requirements of Policy No. 1 shall be demonstrated as to each increment of development prior to filing of a final subdivision map or issuance of any building permit for that increment of development.

3. Plans and specifications for domestic and fire flow water supply shall be submitted to local and state environmental health agencies for approval.

2. WASTEWATER

The concentrated development proposed for some areas of Las Palmas Ranch requires that a wastewater system be provided rather than utilizing individual septic tank systems.

The River Road ADC is within the area proposed for eventual service by the regional sewage system planned by the Monterey Regional Water Pollution Control Agency (MRWPCA).

However, the regional system, if constructed, would not be available until midway through the Las Palmas Ranch development. It appears that Las Palmas Ranch would be served best by a wastewater system that is capable of providing long-range service to the project, if necessary, but is also compatible with the regional system, if and when it becomes available.

A County Sanitation District or Community Service District is proposed to own and operate the collection, transmission, treatment and disposal facilities not owned or operated by MRWPCA.

POLICIES

1. Concentrated development within the project (i.e. development at greater than one unit per acre) shall be served by a wastewater treatment facility approved by local and state health agencies. Areas with lots larger than one acre in size may utilize septic tanks provided that appropriate soils tests and nitrate loading studies are submitted to and approved by the Health Department prior to approval of any tentative subdivision map and required permits are obtained from the Health Department.

2. The wastewater treatment facilities for Las Palmas Ranch shall be either an on-site facility approved by appropriate local and state health agencies,a consolidated facility with Spreckels, or connection with Monterey Regional Water Pollution Control Agency. If such facilities are owned or operated by a governmental entity not subject to control by the Monterey County Board of Supervisors, said entity's approval of all plans for such facilities shall be subject to the satisfaction of the Health Department. Location of any on-site facilities shall be subject to land use controls, and shall not conflict with any agricultural uses. Treatment facilities shall not be located north of River Road nor shall this area be used for effluent storage or disposal.

3. The Las Palmas Ranch wastewater treatment and disposal facilities should be designed to be compatible to be connected to the regional system proposed by Monterey Regional Water Pollution Control Agency.

4. A County Sanitation District, Community Services District, or other appropriate public entity meeting the requirements of the Public Works Department shall be formed prior to filing any final subdivision map to own and operate the collection, transmission, treatment and disposal facilities not owned or operated by MRWPCA.

5. A third party engineering consulting firm acceptable to both the developer and the County shall be employed by the County and paid for by the developer to review and approve the developer's plans for the wastewater treatment facilities.

6. A detailed wastewater management study for the entire project must be submitted to local and state health agencies for approval prior to final approval of the tentative map for the first increment of residential development. The study shall designate the type of public entity (county sanitation district, community services district or other entity) to be formed to own and operate the wastewater facilities, and whether such agency will be a county-operated agency or a non-county-operated agency.

7. Should an on-site wastewater treatment and disposal facility be abandoned in the future, the facility should be demolished and the land converted to agricultural or open space uses.

8. Availability to wastewater treatment and disposal facilities meeting the requirements of the foregoing policies shall be demonstrated as to each increment of development prior to filing of a final subdivision map or issuance of

any building permit for that increment of development. The developer must demonstrate that the wastewater facilities for initial increments of the project are capable of expansion to serve the entire project.

9. A discharge permit from the California Regional Water Quality Control Board, if required; any annexation agreements with Monterey Regional Water Pollution Control Agency, if appropriate; and all other permits (other than building permits and grading permits) necessary to construct and operate the wastewater facilities shall be obtained prior to acceptance of improvement plans, subdivision agreement or final subdivision map for the first increment of development in the project.

10. Wastewater shall not be permitted to flow, seep or drain into the Salinas River.

3. SCHOOLS

At buildout, Las Palmas Ranch will generate approximately 400 K-8 and 200 9-12 grade students, at least in initial occupancy years. A review of this educational picture with the Spreckels Elementary School Board has been undertaken and the board has seen a ten acre parcel on the Las Palmas Ranch designated in this Specific Plan as an elementary school site, should the district need another school (see Figure D). The superintendent of the Salinas Union High School District wrote on May 27, 1981, that the high school has experienced about a 10% decline in enrollment from the Toro Area over the last five years and that the decline is expected to continue if not accelerate. Salinas High School has indicated ability to accommodate its share of student population from Las Palmas Ranch at existing facilities in Salinas.

Monterey County has enacted a school facilities fee/dedication ordinance for the purpose of providing a method of financing school facilities necessitated by new residential developments.

POLICIES

1. Dedicate an elementary school site, at least ten acres in size, as shown in Figure D.

2. Comply with the Monterey County school facilities fee/dedication ordinance.

4. FIRE PROTECTION

Fire protection to the River Road ADC is presently provided by the Salinas Rural Fire District from a station on Portola Drive just west of the interchange of River Road and Highway 68. This station houses a three-man engine company. Besides the pumper truck, two other pieces of equipment are kept at this station, a grass and brush truck and a tanker, the latter required for fires in areas with inadequate water systems. The station also has a paramedic emergency service unit.

According to the fire district, significant development in the River Road ADC may, at a future point, require the development and manning of a new station in the River Road area. The timing of such investment by the district and the staffing arrangement are dependent upon the pace and scale of overall development (at Las Palmas, Toro Vista, Vista Del Rio, and Indian Springs), and the outlook for volunteer manning of certain facilities.

POLICIES

1. Provision shall be made for necessary fire protection facilities.

5. POLICE PROTECTION

Police protection is provided to the area by the Monterey County Sheriff's Department operating from the headquarters facility in the county civic center in Salinas, approximately four to five miles from the site. The River Road area currently requires minimum usage of police services. According to the head of the patrol division, service needs are determined by the incidents of crime in an area rather than by the population. The River Road area is considered a low crime area and would be expected to remain so even with the development of Las Palmas Ranch. According to department sources, the addition of 2,770 people in the area would not require the initiation of a new beat and thus there would be no substantial increase in sheriff department costs as a result of the proposed project.

Policy.

1. Provision shall be made for necessary police protection.

CHAPTER III

THE REGULATORY FUNCTION

Government Code, Section 65451 requires that a specific plan shall include all regulations which shall be necessary or convenient for the systematic implementation of the plan. This Chapter III is intended to satisfy the requirements of section 65451 by discussing those existing and proposed regulatory functions which will be required of Monterey County in order to make the goals, objectives and policies of this specific plan a reality.

A. CEQA COMPLIANCE

The adoption of this specific plan is in itself a "project" which requires environmental assessment pursuant to the California Environmental Quality Act, Public Resources Code Section 21000 et seq ("CEQA"). With that in mind, the Board of Supervisors directed that an environmental impact report ("EIR") be prepared for this plan. The EIR addresses not only the proposed development of Las Palmas Ranch, but also the general plan amendment by which the River Road ADC was established.

Government Code, Section 65453(b), a portion of the specific plan law, provides that notwithstanding any other provision of law, no EIR or negative declaration need be filed for any residential project, including any subdivision or zoning change, which is undertaken pursuant to and in conformity with a specific plan for which an EIR has been certified. Thus, in the absence of substantial change (see Public Resources Code, Section 21166, and County Guidelines, Section 607) the EIR certified in connection with this Specific Plan serves as a "master" EIR for all of the residential development at Las Palmas Ranch.

Subsequent focused EIR's may be required for nonresidential aspects of the project to explore mitigation alternatives in detail. Supplemental EIRs will not be prepared for the residential development unless required by Government Code Section 65453 (b) and Public Resources Code Section 21166.

B. ZONING

The Las Palmas Ranch is presently in three zoning classifications: F-V-B-5; K-V-E-B-4; and SC/1-E-V. None of these classifications as presently applied is appropriate for the interim or ultimate land use regulation of the property.

1. Interim Zoning

Following approval of the specific plan, but prior to the filing of any subdivision map for the first increment of development, it would be appropriate to place the entire ranch into an interim or holding classification or classifications that would recognize its future use pursuant to the specific plan, but prevent the development of inconsistent uses prior to first increment subdivision. The agricultural land north of River Road should be retained in the F-V-B-5 (exclusive

agriculture) classification. The balance of the ranch should be classified "T" (transitional) or other appropriate holding classification which limits inconsistent interim uses but anticipates further rezoning.

2. Ultimate Zoning

The tentative subdivision map for each increment of development should be conditioned to require "follow-up" rezoning to a classification corresponding to the character and density of use specified for each of the lots or parcels included in that subdivision map. Single family lots larger than one acre ordinarily should be placed in "RR" (rural residential) classification. Lots of one acre or less proposed for the detached single family residential development ordinarily should be zoned "R-1-B-6".

Parcels proposed for condominium, townhouse ("PUD"), zero lot line, or other multifamily development, ordinarily should be placed in "ST" (special treatment), "R-1-S" (integrated single family), "R-2" (duplex), or "R-4" (multifamily) classification, depending upon the nature and circumstances of each individual application. All commercial areas should be placed in "PC" (planned commercial) zoning. In the case of the Corey House, the "PC" zoning should be combined with the "HR" (historic resources) district to assure the protection, enhancement and perpetuation of the historic character of the structure. The "D" (design control) combining district should be applied to all areas proposed for structural improvement. Major open space areas should be placed in "O" (open space) zoning.

C. USE PERITS

All of the residential development proposed within areas zoned "ST" will require issuance of a conditional use permit. Residential development within the other zoning classifications may require a conditional use permit depending upon the character or density of the proposed development.

Commercial development under the "PC" zone will require both a general development plan covering the entire commercial complex; and one or more zoning permits for individual buildings or uses covered by the general development plan.

Whenever possible, use permit applications should be processed concurrently with subdivision or other corresponding procedures in order to reduce expense and delay both to the staff and to the developer.

D. SUBDIVISION

The Subdivision Map Act and the Monterey County Subdivision Ordinance define any division of land for purposes of sale, lease or financing as a subdivision requiring some form of local regulatory approval.

The process of actually subdividing the Las Palmas Ranch in accordance with this Specific Plan could follow a number of different routes depending upon marketing and economic conditions, the type and availability of development and

purchaser financing, and housing trends for both inclusionary and market rate housing. Both standard subdivisions and minor subdivisions may be utilized to implement this plan; and subdivisions for the purpose of both sale and financing may be required. In any event, it is apparent that the entire project will not be developed under a single tentative subdivision map.

The most foreseeable scenario is the submittal of a tentative subdivision map for a particular phase of the project. That tentative map may reflect the development of that phase in two or more increments of as few as twenty residential units.

In the case of a "first generation" subdivision, the tentative subdivision application will be accompanied by a rezoning application, and if required by the new zoning, a use permit application.

In order to implement the goals and objectives of this plan to provide a broad mix of housing types and prices, two or more "generations" of subdivision may be required. The "first generation" subdivision, for example, may create a group of larger parcels with an assigned density in accordance with this Specific Plan, to be followed by "second generation" subdivisions of each "first generation" parcel to create the specific planned development (whether standard subdivision, multifamily, condominium, townhouse or other) thereon. Appropriate conditions should be applied at each stage of the subdivision process to assure that the objectives of this Specific Plan are carried out. Some "first generation" subdivisions may be conditioned to preclude any actual development until a "second generation" subdivision is approved in which case no exactions should be imposed upon the "first generation" subdivision.

Following approval of a tentative subdivision map, one or more minor subdivisions may be required, for example to allow the separate financing of one or more of the increments within the approved tentative maps, or to permit the sale of an increment to a joint venture developer or to a non-profit entity for the development of low or moderate income units. So long as the goals, objectives and policies of this plan are not subverted by the procedure the County should cooperate and assist in the phased and incremental subdivision of the project.

A number of means are available and should be used in connection with the subdivision process to reduce the ultimate cost of the housing units in Las Palmas Ranch.

1. Whenever possible, the subdivision approval process should be consolidated with corresponding zoning, use permit and similar procedures. In this way, staff, developer and public time and expense can be saved, and unnecessary delay avoided.

2. Optional or modified design and improvement standards should be permitted and encouraged where the liveability, convenience, or appearance of the project would be enhanced or where such design or standards would better achieve

the objectives of this Specific Plan and of the Monterey County Housing Plan to encourage the development of low or moderate income housing.

E. CONDITIONS OF APPROVAL

The Board of Supervisors at the time it approves this specific plan will adopt conditions of approval which will serve to supplement or amplify the goals, objectives and policies of this specific plan. If such conditions are imposed, they shall be deemed incorporated into and a part of this plan.

Conditions should also be imposed on tentative maps, use permits and zoning permits as required to implement the policies contained in this plan and to assure compliance with the terms of any development agreed utilized in connection with this Specific Plan.

F. MODIFICATIONS TO PLAN

Changes or modifications to this plan which do not substantially alter the nature of the uses, the population density or building intensity, or any of the goals, objectives or policies of this specific plan, shall be deemed ministerial and may be approved administratively. Any change or modification to this Plan which is not ministerial shall require approval by the Board of Supervisors of a specific plan amendment.

CHAPTER IV

NONREGULATORY IMPLEMENTATION

GOAL: To provide an innovative framework for private and public implementation of the facilities and services element of the Las Palmas Specific Plan.

DISCUSSION:

Full development of Las Palmas Ranch involves the construction, operation and maintenance of community facilities. These facilities include those serving community education, recreation, health and public safety functions. Limitations to the ability of existing public agencies to fund new public investment make it desirable to propose these developer-sponsored, nonregulatory implementation objectives and policies.

Development of Las Palmas Ranch may justify the use of assessment and service district financing in conformity with criterium 7 of Board resolution 83-121. Under California statutes, assessment districts (typically formed under the Acts of 1903, 1911, 1913 and 1915) have been employed to support initial financing of capital improvements, such as streets and flood control facilities. Service Districts (such as County Services Areas (-"CSA"); and Community Service Districts ("CSD") are commonly employed to provide a funding source for continuing programs, of operation and maintenance, such as parks and recreation programs, and police protection. Other special districts may be used to operate and maintain sanitation, water, lighting and like facilities.

The necessity to utilize any combination of the above districts will be governed by the timing and phasing of Las Palmas Ranch development, service levels to be established, the costs of constructing, operating and maintaining public facilities, and developer financing applied to these requirements. Rights and responsibilities of all involved witnesses will be established as the specific plan is approved and the Las Palmas Development Agreement is executed. Transfer of various properties or facilities from developer to homeowners' associations or public bodies also affects the extent to which private and public funds are required and employed.

The provision of public utility services to Las Palmas Ranch will be arranged via agreements between the developer and the serving utilities.

Elementary and high school education needs will be examined by the serving school districts (Spreckels Elementary and Salinas High School District) and met in accordance with district policies. New classroom construction at Las Palmas Ranch is at the discretion of Spreckels Elementary District.

The Las Palmas Ranch Specific Plan provides for nine hundred acres of land devoted to open space and natural recreation area, and twelve acres devoted to

mixed commercial/recreation/community uses. Ownership and maintenance of these facilities requires a special implementation approach.

The Las Palmas Ranch Specific Plan calls for restoration and maintenance of the Corey House and adjacent site area as a link with the property's heritage. Multipurpose use of the property is planned under developer ownership and control.

In summary, the policies following are designed to facilitate the timely identification of Las Palmas Ranch service and facilities needs, and the funding and provision of these required services and facilities within the overall phased development program. Applicable general objectives and specific policy statements follow:

GENERAL OBJECTIVES:

1. Arrange for the provision of adequate community services within approved areas of development concentration.

2. Provide for the development of adequate public facilities serving these areas of development concentration.

Minimize Monterey County operating and financing problems associated with provisions of these services and facilities.

A. ASSESSMENT AND SERVICE DISTRICT POLICIES

1. Appropriate assessment districts should be structured to supplement developer contributions and fully capitalize Las Palmas Ranch infrastructure and facilities requirements.

2. The impact of early project public improvement costs on housing costs should be reduced via the use of long-term assessment district bond financing.

3. A Las Palmas Ranch service district framework should be designed to adequately cover anticipated operating and maintenance costs for street lighting, street and flood control maintenance, parks, recreation facilities and the like.

4. A service district and assessment/bonding framework should be established to support Las Palmas Ranch capability to pay a necessary share of any future River Road ADC capital fund requirements for public protection (County Sheriff and Salinas Rural Fire Protection District) not yet determined.

5. Within the special district concept, a County sanitation district should be formed to own, operate and maintain the Las Palmas wastewater facilities, eliminating any disproportionate financial burden on regional wastewater systems and the County of Monterey.

6. Continuous monitoring and review of police protection needs at Las Palmas should be coordinated with the Monterey County Sheriff's Department.

7. The provision of any new operating funds or facilities for fire protection by the Salinas Rural Fire District should be implemented through the service district concept.

B. HOMEOWNER'S ASSOCIATION POLICIES

1. All areas and facilities to be owned in common should be transferred at appropriate intervals from developer to designated homeowners' associations or special districts.

2. The formation and operation of neighborhood, village (or similar) and master homeowners' associations should be implemented to receive, operate and finance properties to be held in common ownership.

3. Ownership and operation of public facilities should be accommodated within the facilities special service district (CSA, CSD, sanitation district, etc.).

4. An adequate legal and operating framework for resident homeowner associations and for ownerships of properties by service districts shall be developed.

APPENDIX

River Road Area of Development Concentration

General Plan Amendment

On March 22, 1983, the Board of Supervisors adopted an amendment to the Monterey County General Plan establishing the River Road Area of Development Concentration. This action and criteria becomes the basis for the formation of specific plans requiring any such plans in this area to be consistent with this action and meet the minimum requirements set forth in Board Resolution No. 83-121. The General Plan amendment is as follows:

BE IT FURTHER RESOLVED that the Board of Supervisors approves the following General Plan amendment:

A. Designates the River Road area as an Area of Development concentration;

B. The boundaries shall be those referred to the Planning Commission, as amended and as shown on the attached map, "River Road Area of Development Concentration dated March 22, 1983." The uses shall be those designated by and consistent with the General Plan for the area covered.

C. The development criteria for the Area of Development Concentration shall be as follows:

1. Existing or approved development within the River Road ADC shall be maintained or developed in accordance with existing or approved tentative or final subdivision maps, use permits or specific plans.

2. The basic residential density for the new major subdivision development within the River Road ADC shall be a maximum of one unit per gross developable acre except where topography, physical constraints or other factors would preclude this density. Development including septic systems shall not be allowed on slopes over 30%. Condominiums, town

houses, zero lot line houses, and other forms of clustered or multifamily housing, shall be considered within this basic density where adequate utilities are available; and shall be encouraged where such development will help to protect public viewsheds, natural resources or prime agricultural lands, or will facilitate providing housing for families of low or moderate income.

3. Developable acres within the ADC shall be determined by establishing the overall gross area and subtracting areas of cross-slope in excess of 30%; prime agricultural land, and any other areas constrained by physical or environmental reasons.

4. New residential subdivisions within the River Road ADC shall provide at least 15% of their units for families of low or moderate income.

5. The ADC shall contain a Development Incentive Zone (DIZ) of 10 acres and is to be developed at a maximum residential density of 10 units per acre.

6. Necessary public services and facilities in an ADC shall include, but not be limited to, police and fire protection, sewers, roads, road maintenance, erosion, flood control, drainage, recreation, emergency escape routes and elementary schools. Also, service and facility requirements for the ADC should be scaled to the nature and scope of the ADC.

7. New development within the River Road ADC shall be served by a public utility water system or an incorporated mutual water company providing domestic and fire flows in accordance with all requirements of state and county environmental health agencies. Provision of necessary public services may be addressed and provided for on an ADC-wide basis, based upon the County's determination including the need for service areas and assessment districts. The County may assist in these endeavors.

8. New residential subdivisions within the River Road ADC on lots of less than one acre shall be served by a community sewage treatment facility meeting all requirements of state and county environmental health agencies.

9. Adequate police and fire protection shall be available at the time of development.

10. Appropriate elementary school sites shall be dedicated.

11. In order to mitigate adverse impacts on significant view shed areas, the following standards shall be applied to new development within the River Road ADC:

a. Ridge top development shall be prohibited.

b. Low level exterior lighting, including streetlights, shall be utilized consistent with maintenance and public safety requirements.

c. Roads which are perpendicular to viewing areas or which involve excessive cut or fill shall be discouraged.

d. Visually obtrusive building materials and finishes shall be avoided.

e. Higher density housing units shall be clustered behind natural land forms or be visually compatible and unobtrusive.

f. Utilize mounding, informal massing or irregularly spaced trees, planting, and other overall landscaping treatment to screen development.

g. Preserve vegetation significant to maintain visual quality and to provide erosion control on sensitive slopes.

12. Erosion, siltation and drainage controls shall be implemented in order to enhance watershed management, to protect on site and riparian vegetation, to protect prime and productive agricultural land, to maximize retention and percolation of surface water on site and minimize hazards to development.

13. An irregular or meandering landscaped setback, with a minimum depth of 50', shall be established along the frontage of River Road.

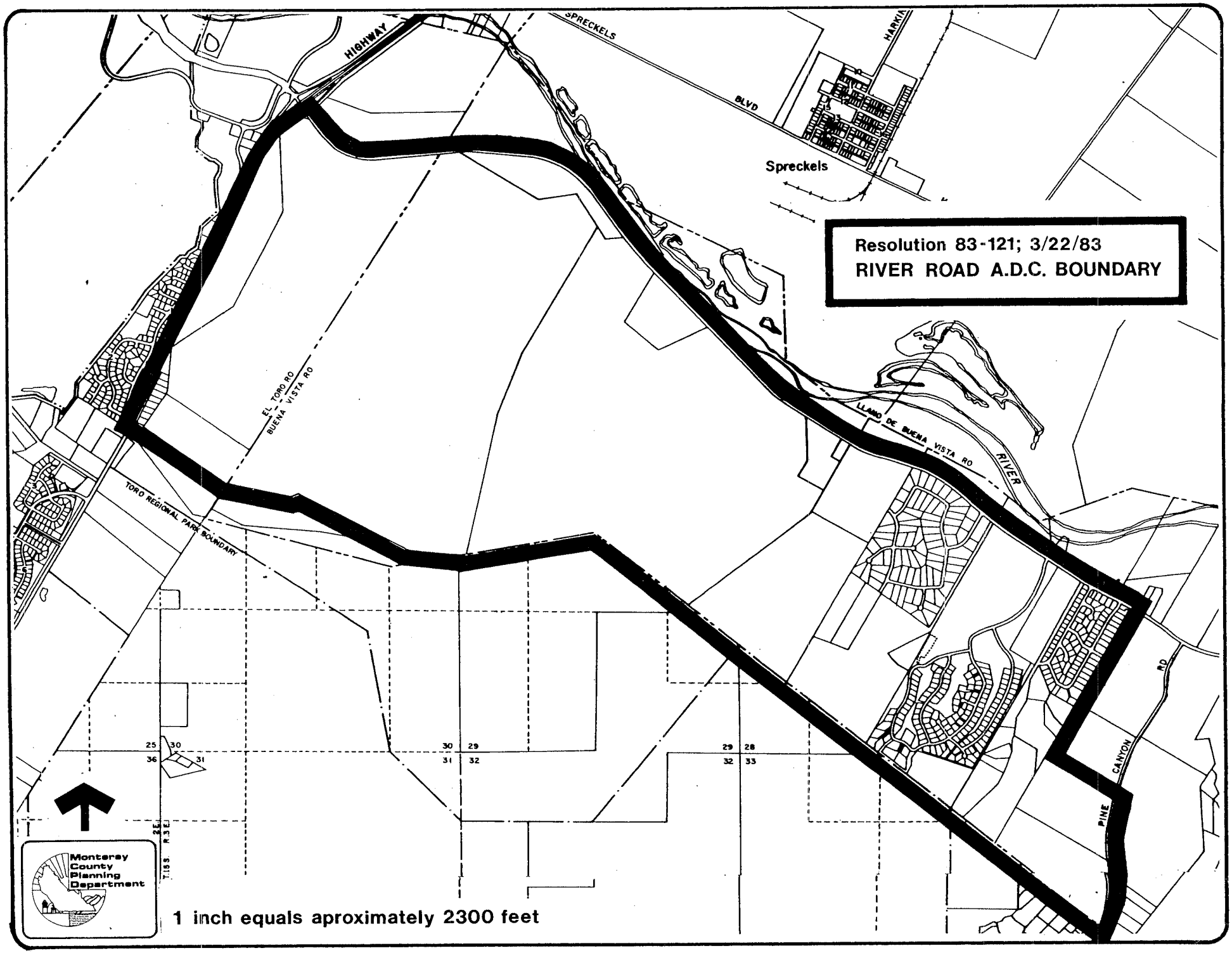
14. Provide centrally located commercial facilities appropriate to meet the convenience needs of residents of the River Road ADC. Such facilities shall be developed under general "Planned Commercial" or similar zoning which regulates uses, design and signing.

15. New residential subdivision within the River Road ADC shall provide usable open space and recreational facilities for the residents of the subdivision.

16. Significant archaeological and historical sites shall be preserved and protected as cultural resources. The Corey House should be restored and used for social, recreational and commercial purposes of a localized nature.

17. All new development within the River Road ADC shall provide detailed soils reports identifying sensitive and/or erodable soils. Such information shall be used to mitigate impacts and to insure the prevention of degradation and erosion of such sensitive soils and the degradation of agricultural lands adjacent to the ADC.

18. All run-off from such developments in the ADC shall be retained or directed so as to not adversely affect agricultural lands and farming operations north of River Road. This policy as well as the other policies herein shall insure the permanent preservation of agricultural lands adjacent to the ADC.


Resolution 83-121; 3/22/83
RIVER ROAD A.D.C. BOUNDARY
HIGHWAY
SPRECKELS
BLVD
HARKINS
Spreckels
EL TORO RD
BUENA VISTA RD
LLANO DE BUENA VISTA RD
RIVER
TORO REGIONAL PARK BOUNDARY
PINE CANYON RD
25
30
36
31
30
29
31
32
29
28
32
33
T.15 S.
R.3 E.
R.2 E.
Monterey County Planning Department
1 inch equals aproximately 2300 feet

CERTIFIED AS FINAL EIR BY
MONTEREY COUNTY BOARD OF
SUPERVISORS ON DEC 7 1982

FINAL ENVIRONMENTAL IMPACT REPORT

FOR THE

RIVER ROAD AREA OF DEVELOPMENT CONCENTRATION (EIR 81-111)

INCORPORATING THE

FINAL EIR

FOR THE

LAS PALMAS RANCH SPECIFIC PLAN (EIR 80-100)

APN 139-011-5 and
APN 139-012-2, 4, 5, 6, 7, 8 and 10
Base Map #12
File #PC3934

PREPARED FOR

MONTEREY COUNTY, CALIFORNIA

By

GRUNWALD, CRAWFORD & ASSOCIATES
City, Regional & Environmental Planning Consultants
804 N. Irwin
Hanford, CA 93230

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ERRATA SHEET

The following corrections have been made according to requests by commenting agencies and individuals.

The text should be corrected on the designated pages to read as follows:

1. Page 64, paragraph 3, lines 3 and 4: (Delete the following: "9,000 vehicles per day or 900 vehicles per hour for service level "C" operation".)

2. Page 64, Table: 1980 Volume = 16,800.

3. Page 66, paragraph 1, line 1, second sentence: Although funding for the entire freeway is not on CALTRANS' 5 year improvement schedule, funding for a Toro Park interchange has been included.

4. Page 74, Mitigation Measure 1.d.: Left turn approaches should be striped on River Road approaches to northbound and southbound on-ramps to Highway 68.

5. Page 23, Public Works #2: The new streets for Las Palmas would be built by the developers and may be dedicated to the County as completed.

SUMMARY

PROJECT

This Environmental Impact Report (EIR) addresses the proposed River Road Area of Development Concentration (ADC) as the overlying "project" of the EIR with two alternative specific plans considered for the Las Palmas Ranch portion of the ADC. The Ranch (1,578 acres) is the only significantly large ownership within the proposed ADC that is not already committed to development other than agriculture.

The alternative plan for the Ranch that is based on the existing Toro Area Master Plan and the Monterey County General Plan is referred to in the EIR as the Existing Policy Specific Plan. The alternative plan that is based on the criteria for the proposed River Road Area of Development Concentration is titled the ADC Policy Specific Plan.

LOCATION

The proposed River Road ADC is bounded by River Road, State Highway 68, Toro Regional Park and Pine Canyon Road. Exhibit 1.1 shows these boundaries within the regional setting. Exhibit 1.2 depicts the Las Palmas Ranch within the proposed River Road ADC.

APPLICANT

Las Palmas Ranch Partnership.

IMPACTS AND MITIGATION MEASURES

The following discussion briefly summarizes potential impacts of each alternative plan for Las Palmas Ranch as well as the cumulative effects within the ADC area. The mitigation measures include those embodied in the specific plans and also those recommended in this report.

The summary indicates that even with the ADC Policy Plan's more extensive mitigation, the remaining unavoidable impacts in several categories are still greater than with the Existing Policy Plan. While the differences individually are not significant, the cumulative effect from full development with an ADC would probably be moderately significant compared to insignificant with the lower density plan with less than one-half the number of dwelling units.

Geology

Impact: For both alternatives, there is a potential for groundshaking and ground failure due to activity of nearby faults; the King City fault, however, does not exist on the Las Palmas development site.

Mitigation: Structural requirements of the Uniform Building code will mitigate most of the impact to structures.

Cumulative: Additional geotechnical studies may be necessary if development is proposed, in areas other than Las Palmas Ranch.

Soils

Impact: Both plans would remove 33 acres of productive agricultural land south of River Road for residential use; an additional 55 acres of prime soil north of the Road would be affected by the wastewater treatment facilities. Only about one-half of this 55 acres would be affected by the Existing Policy Plan due to less effluent treatment capacity while the ADC Policy Plan would influence virtually the entire parcel. However, the impact of either alternative specific plan is a significant adverse impact on the viability of the entire 88 acres.

There is a risk to development from soil hazard areas and soil erosion in both plans. This risk is relatively greater with the ADC Policy Plan, however, because more intense site development and greater use of "sensitive" soil capability areas are proposed.

Mitigation: If connection is made to the regional sewage treatment system, the proposed wastewater treatment facilities are to be abandoned and soil returned to unrestrained agriculture use. Drainage and erosion control plans would be required prior to final map approval.

Cumulative: Long-term agriculture use has a greater potential for erosion than urban use. Best Management Practices of the Soil Conservation Service are recommended for agricultural lands. The conversion of row crop land for housing (33 acres) and sewage facilities (52 acres) removes 85 of the 88 acres. Also, the 3 acres remaining would not be an economic row crop farming unit. This could set a precedent for Toro Vista to utilize the same type of treatment/ irrigation system which would remove additional farmland. If feasible, an interceptor to a regional plant would be more consistent with a primary goal of the ADC and General Plans for the area. However, 40 of the 52 acres proposed for wastewater treatment facilities would still be in agriculture but limited to non-food crops.

Hydrology

Impact: Increased runoff could cause on-site flooding and greater erosion hazard. The ADC Policy Plan could increase these hazards due to increased densities and more intense site coverage than the Existing Policy Plan. Uses north of River Road and to a limited extent south of the Road, could be subject to flooding from the Salinas River in a 100 year occurrence.

Mitigation: Extensive drainage and erosion control policies and proposals are provided in both plans and in the EIR. For the ADC Policy Plan, these control measures must consider greater runoff volumes and be planned accordingly. Uses within the 100-year flood plain are to be constructed to be flood-safe and located to avoid increased flooding downstream.

Cumulative: Undeveloped or agricultural parcels will continue to contribute to localized flooding and erosion problems. The cumulative impact from full development of the ADC area, using either alternative plan, would be no greater than the existing problems if the erosion, drainage and flood control programs proposed by the Ranch owners and those in the EIR are fully implemented.

Groundwater

Impact: An adequate groundwater supply is anticipated for development in the River Road area. There is a greater potential for declining water quality with the ADC Policy Plan than the Existing Policy Plan because of a greater pumping rate (922 ac/ft per year vs. 450).

Mitigation: For either plan, a water conservation plan is proposed. Engineered treatment for sand, iron, and manganese removal, and a chlorinator, will mitigate quality concerns.

Cumulative: Even with complete development of the River Road ADC, no long-term groundwater impacts are expected.

Vegetation

Impact: Damage or removal of mature oaks could occur. Intense development in a major area of oaks is proposed by the ADC Policy Plan. In both plans, introduced plants could flourish at the expense of natives.

Mitigation: A tree preservation policy is proposed with criteria for identifying specimen trees. Areas of important vegetation should be preserved and natural species planted in landscape areas.

Cumulative: Native vegetation will be removed increasing potential erosion problems and decreasing wildlife habitat, but the total impact would not be significant.

Wildlife

Impact: Wildlife habitat areas will be altered and ranges limited. Domestic pets will be introduced; this is more critical with the ADC Policy Plan due to more-than-twice the number of households.

Mitigation: Important habitat areas should be retained in open space, including grassland, woodland, chapparal, and riparian habitat. Leash laws should be strictly enforced and residents educated as to impacts of pets on wildlife.

Cumulative: There will be displacement of some larger species to nearby open lands leading to the eventual loss of these individuals. The habitat for many species, such as songbirds, will be enhanced.

Aesthetics

Impact: Viewshed from Salinas Valley could be affected by both development plans as could views from Highway 68 and River Road. The ADC Policy Plan has a somewhat greater potential to disrupt on-site views.

Mitigation: In both plans, development is proposed behind the major ridge lines visible from Salinas and Highway 68. A 50' landscaped setback is proposed along River Road to provide screening for motorists. Both plans propose architectural controls and reviews by a homeowners' association.

Cumulative: Despite visual controls, the River Road area will continue its gradual change from an open rangeland area to a semi-urban environment.

Noise

Impact: Ambient levels will increase to those of a more urban area. The ADC Policy Plan will have a greater impact on the noise environment because:

- construction noise will be more widespread and prevalent due to greater construction activity.

° higher density areas generally create more nuisance related problems; noise complaints will increase.

° larger traffic volumes on River Road will increase the area of noise concerns adjacent to the roadway.

Mitigation: Construction activities will be limited to weekdays during daylight hours. The 50' landscaped setback along River Road will provide some mitigation; the building setback in both plans, however, should be outside the 60 CNEL contour.

Cumulative: The major noise impacts in the River Road ADC will be at Las Palmas and Toro Vista although ambient levels will increase slightly throughout the area.

Traffic

Impact: For the Existing Policy Plan, increases in daily traffic will reduce Level of Service on River Road, but LOS "C" would probably be maintained. ADC Policy Plan traffic would reduce LOS on River Road to "D" during morning rush hours. For both plans, the south-bound on-ramps and north-bound off-ramps of Highway 68 will be impacted, increasing congestion.

Mitigation: For the Existing Policy Plan, River Road should be constructed to Secondary Street status with right and left turn pockets constructed on River Road approaches to site entrances. For the ADC Policy Plan, River Road should be constructed to Major Street status with appropriate turn movements.

Cumulative: Due to the combined impact from throughout the region, the State and County will ultimately have to construct Highway 68 to four lanes between River Road and Highway 1. New development which would directly impact this

segment should be included in "zones of benefit" and pay a fair-share formula into an improvement fund.

Air Quality

Impact: The primary air quality impact from either plan would be the cumulative increase in vehicle emissions. Neither plan would have a significant air quality impact but would add incrementally to overall degradation of air quality in Monterey County.

Mitigation: Proposed mixed land use, transit use, and alternatives to the auto (foot and bike paths) will help to decrease auto travel and exhaust emissions. The County's Air Quality Maintenance Plan remains the best opportunity for promoting basin-wide air quality improvement strategies.

Wastewater Management

Impact: There are no existing central systems serving the ADC area. The applicant proposes that all lots in either plan be served by a community system. Total wastewater discharge from the Existing Policy Plan would be 164,000 gallons per day and 360,000 gallons per day from the ADC Policy Plan. The wastewater treatment facility is proposed north of River Road on prime agriculture land. The reclaimed water would be used for irrigation of non-food crops. The facility is in the 100-year flood plain of the Salinas River.

Mitigation: Potential impacts can be mitigated by discharge requirements of the EPA, the State Water Quality Control Board and the County Health Department. If connection to the regional system is realized, the treatment plant should be dismantled and the land reclaimed. The treatment plant can be protected from flooding with encompassing levees.

Cumulative: Due to the potential cumulative impact to the groundwater from individual private systems, consideration should be given to a design solution

to include at least the Toro Vista development as well as Las Palmas. A district should be formed to operate wastewater treatment facilities (either a county sanitation district, community services district or county service area).

Water Service

Impact: All units in both plans would be served by community water system. Most significant impact is system management and maintenance.

Mitigation: The design and operation is subject to requirements of the PUC, State and County Health Departments, and the Monterey County Flood Control District. Operating under Health Department regulations, a private water company would operate and maintain the system.

Cumulative: To avoid duplication of service, consideration should be given to an area-wide service entity to ensure continued adequate water service.

Schools

Impact: The Existing Policy Plan would generate 346 K-8 students and 166 9-12 students. The ADC Policy Plan would generate 757 K-8 students and require a new elementary school and 363 9-12 students. The Salinas High School would not be significantly impacted.

Mitigation: A 10-acre elementary school site is proposed to be reserved at Las Palmas and the County's SB 201 ordinance imposed.

Cumulative: No new high school will be needed for the River Road area. An elementary school will be required which would also serve existing development in the area thus reducing current busing requirements. In addition to site reservation and temporary classroom fees, permanent classrooms will be needed.

Fire Protection

Impact: There will be increased wildland fire hazard in an area rated moderate to high hazard, and an increased demand on the Salinas Rural Fire Protection District for structural fires.

Mitigation: Both plans should incorporate design considerations to reduce on-site fire potential. Fees should be assessed for additional manpower and equipment.

Cumulative: When the River Road area is fully developed, an additional fire station may be required at a cost of $250,000 to $400,000. Twenty-four hour service by a 3-man crew would require an annual operating budget of $300,000.

Police Protection

Impact: Increased demand for police service would result, although this would remain a low crime area. The ADC Policy Plan would create additional demand due to larger population, areas of higher density and greater commercial floor space.

Mitigation: Site plan review is recommended for design related deterrents to crime; homeowners and the Sheriff's Department should create a Neighborhood Watch Program.

Cumulative: No significant long-term impacts on the Sheriff's Department are anticipated.

Energy Conservation

Impact: Provision of electricity and natural gas service will not stress existing capacities. For either plan, energy usage will have an insignificant impact on regional systems.

Mitigation: Energy waste can be decreased through a comprehensive program of site design and construction measures.

Cumulative: Due to longer than average trip length to jobs, major shopping and recreation centers, fuel consumption per household for transportation will be above average. The combined effect will be significant when the River Road ADC reaches full development.

Archaeological/Historical

Impact: No impacts on resources are expected.

Mitigation: For undeveloped parcels outside Las Palmas Ranch, an archaeological survey should be undertaken as a part of the environmental review process.

RESPONSE TO COMMENTS

This section presents responses to the written comments received during the referral period of August 16, 1982 to October 1, 1982. Copies of the nine letters and memoranda received on the draft of the Environmental Impact Report are found in Appendix B of this report.

Pursuant to Sections 906 a (2) and 906 b of the Monterey County Guidelines, these letters and memoranda have been reviewed by the Environmental Section of the County Planning Department. The staff indicated to the consultant those comments requiring a response. Also, the notes on the staff's review are reflected in the consultant's response.

MONTEREY COUNTY SHERIFF'S DEPARTMENT

Comment #1: There will be a significant cumulative impact on Sheriff's Department services as a result of development of the several projects in the River Road and Highway 68 areas. Although the Sheriff's Department personnel will not be increased as a result of development of the River Road Area plan, the cumulative impact from overall growth may necessitate additional personnel.

Response: Assuming the statistics given in the letter to support the magnitude of the cumulative impact are applicable to this projected low crime area, the cumulative effect from full development would, in fact, be significant.

Comment #2: Several specific protection and crime prevention measures were offered for consideration.

Response: The suggested additional specific crime prevention measures are acknowledged and should be considered during the specific design/development stage.

MONTEREY COUNTY PUBLIC WORKS DEPARTMENT

Comment #3: The report incorrectly implies that our department established the volume of 900 vehicles per hour for level of service C. The remainder of the sentence after "capacity for a two lane highway" can be omitted.

Response: See (1) on Errata Sheet.

Comment #4: The 1980 volume on Highway 68 was 16,800 vehicles per day. The 1981 volume was 16,700 vehicles per day.

Response: See (2) on Errata Sheet.

Comment #5: Funding for a Toro Park interchange has been included in the State Transportation Improvement Program.

Response: See (3) on Errata Sheet.

Comment #6: Volumes on local roads should be compared to service volumes for Level of Service C, not to capacity volumes.

Response: The comment is in reference to the general statment on Page 66, paragraph 3, regarding traffic on local streets in the vicinity of the Las Palmas Ranch. Generally speaking, the current daily volumes are at or better than LOS C. See Response to Comment #7 regarding LOS on River Road.

Comment #7: Page 67 - our review of the Las Palmas Ranch Traffic Study recommended that a traffic generation rate of 8.0 trips per day per unit be used for single family dwelling units. Experience suggests no change. The traffic estimates of this draft are therefore somewhat low and are discussed on Page 73.

Response: No response is necessary.

Comment #8: Page 70 - The report compares projected traffic volumes to roadway capacities for River Road and for the four lane section of Highway 68. Projected volumes should be compared to service volumes for Level of Service C to determine if level C will be maintained. Furthermore, regardless of whether or not level C can be maintained on Highway 68 east of River Road, this has no bearing on whether or not improvements would be required on the two lane portion west of River Road. The report is incomplete.

Response: Wilsey and Ham, authors of the traffic study, recently estimated that the service volume for LOS C on River Road is in a range of 10,000 to 12,000 vehicles per day (vpd) depending on the specific location. The average daily traffic on River Road for October, 1980 (Exhibit 2.8, Page 65) ranged between 2,500 and 3,340, which is well below the service volume for LOS C.

The projected 1995 traffic volume on River Road with the ADC Policy Plan is about 19,700 vpd. This is nearly twice the service volume for LOS C, indicating the levels D and E discussed on Page 70, paragraph 3. Las Palmas would account for about two-thirds of the total volume.

The projected 1995 traffic volume on River Road with the Existing Policy Plan is 12,400 vpd which is somewhat above the low end of the service volume range for LOS C (10,000 vpd), indicating the need for the improvements proposed on Page 74.

Additional specific improvements beyond those listed on Page 74 may be required, but can be more readily determined during the specific design/development stage for the alternative plan selected.

Wilsey and Ham estimates that the service volumes of LOS C on Highway 68 east of River Road on the four lane section to be in the range of 45,000 to 50,000 vpd; to the west on the two lane section the range is 13,000 to 15,000 vpd. CALTRANS generally agreed with these estimates in a discussion on October 26, 1982. They consider the current LOS on the two lane section to be between D and E where the current volume is about 16,700 vpd.

The above indicates that the 1995 projection (with the ADC Policy Plan) for the four lane section of Highway 68 of 41,900 ADT (Page 7) is within the service volume for LOS C. Since the Existing Policy Plan would generate far less traffic, LOS C could be maintained well beyond 1995. However, River Road ramp improvements would be needed in either case.

Although either alternative plan for Las Palmas Ranch would account for a small percentage of the projected traffic on the two lane section of Highway 68 west of River Road, the cumulative effect from full development of the Toro Area would cause a LOS of E or F.

Comment #9: The report presents no basis to indicate that ramp levels of service would improve by one level with the Existing Policy Plan compared to the ADC Policy Plan.

Response: The basis is simply that the Existing Policy Plan by itself would generate 6,700 average daily traffic on River Road whereas the ADC Policy Plan by itself would generate over 14,000 ADT.

Comment #10: Page 73 - In responding to our department's second concern (dated October 28, 1981) the report states, ". . . Level of Service C is attained in very few urban settings . . .", and "Level of Service D for a freeway on-ramp during short periods is not unusual in an urban setting . . .". Our department has serious concerns regarding these responses. First, neither Highway 68 nor River Road meet the definition of urban arterials and therefore must be analyzed as rural roads. Second, urban and rural roads are evaluated by different sets of standards. Third, the Monterey County Transportation Plan's goal of level of service C applies to all area roads.

Response: The very definition of an ADC (formerly referred to as an Area of Urban Development Concentration) connotes an urban setting: In the case of the River Road ADC, the traffic on River Road with the ADC Policy Plan would approach 20,000 vpd and about 42,000 vpd on Highway 68. These high volumes typically are not associated with rural road conditions. Signalization and speed limits, which are also a part of the criteria in defining an urban arterial, may also be required by 1995.

Comment #11: Mitigation Measure 1.a. and b. - The limits of the four lane section, being based on projected traffic volumes and levels of service, should be more closely examined.

Response: No response indicated other than to note that the greater level of detail suggested will accompany the environmental review at the project specific design stage.

Comment #12: Mitigation Measure 1.d. - Left turn channelization at the Highway 68 on-ramps (not off-ramps), may be beneficial. However, have the geometrics been reviewed to determine what work will be required to make them fit.

Response: See (4) on Errata Sheet and response to Comment #1.

Comment #13: Mitigation Measure 2.a. - Level of service analysis must be made based on this premise to determine what improvements would be required.

Response: See response to Comment #8.

Comment #14: Mitigation Measure 3. - These cannot be considered mitigation of this project unless the developers of the project (or at least entities other than the general public) propose to construct these improvements.

Response: No response is necessary.

Comment #15: Mitigation Measure 4. - The County does not construct State highways. The Cities of Monterey and Del Rey Oaks are also involved. The first sentence represents a true mitigating measure for this project and should be given serious consideration.

Response: Public funds build highways, whatever the level of government. Given the present budget constraints, greater attention should be given to "user fees" based on zones of benefit.

MONTEREY COUNTY HEALTH DEPARTMENT

Comment #16: Eleven design features and operating practices for the liquid waste treatment facilities were offered.

Response: No response is necessary other than the fact that the list should be considered during the specific design/development stage.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

Comment #17: The draft EIR gives no specific details on the system, which would have to be submitted to the Regional Board. Approval of the sewage system would have to be granted by the Regional Board in the form

of Waste Discharge Requirements prior to any development. Such requirements could be considered only after details of the collection, treatment, and disposal systems had been submitted along with a completed Report of Waste Discharge.

Response: "The Wastewater Management Study" for Las Palmas Ranch, by Engineering Science, which is listed among the References (Section 4, Page 113), is available from the Monterey County Planning Department. Additional details required in applying for Waste Discharge Requirements will be provided during the specific design/development stage.

MONTEREY-SALINAS TRANSIT

Comment #18: As development continues along River Road, the County should require construction and maintenance of a Park-and-Ride, Kiss-and-Ride facility at the intersection of Highway 68. This facility would assist ride sharing and transit usage.

Response: The suggestion has merit particularly in mitigating the projected traffic congestion should the ADC Policy Plan be approved. In lieu of financial participation by Las Palmas in establishing the facility at the River Road/ Highway 68 intersection, the Las Palmas ADC Plan could include a site reserved for the parking facility.

STATE CLEARINGHOUSE TRANSMITTAL LETTER

Enclosure #1 - California Department of Fish and Game:

Comment #19: The department concurs with the recommendation on Page 56 for managing open space. The mitigations concerning the protection of mature valley oaks should be reviewed and approved by experts in range ecology and implemented concurrently with the first phase of development.

Response: See Mitigation Measures, Page 54 and 56. Mitigation Measure #3 should include review of the open space management program by the Department of Fish and Game prior to approval by the County.

Enclosure #2 - California Regional Water Quality Control Board:

(This letter is a duplicate of the one sent directly from the Control Board. See Response to Comment #17 above.)

LETTER FROM SHARON C. HELLER

Comment #20: Information in the report is poorly segregated, particularly as it relates to the impacts of the two alternative plans for Las Palmas Ranch.

Response: To segregate and isolate the impacts of each Plan would have defeated the basic requirement of providing a comparative analysis throughout the report. Admittedly, it is not light reading and requires careful study.

Since no specific comments were provided, no additional response is indicated other than to refer the reader to Section 1.3.1.2, pages 17-25 wherein the two alternative plans were treated separately.

LETTER FROM CLARA SARGENTI

Comment #21: It appears to me that the Draft Report is limited to the Las Palmas project. I believe that there should be further discussion on the needs of the entire River Road area. A specific point I'd like to address is the anticipated water use. Will not the water to the Castroville area be intercepted?

Response: The cumulative effects/mitigation of full development within the area are discussed throughout the report as well as in Section 3.1 Cumulative Impacts, pages 106 to 109.

The Environmental Impact Report for the Arroyo Seco Dam project is being prepared and will address the issue of water for the Castroville area. The Arroyo Seco Dam Feasibility Study, Chapter V-11, Final Report, by CH2M Hill, April 1982, indicates that the amount of water intercepted will not significantly affect water to be transported to the Castroville area.

SECOND LETTER OF TRANSMITTAL FROM THE STATE CLEARINGHOUSE

Enclosure #1 - California Department of Transportation:

Comment #22: Section 2.7 Traffic should have a discussion of the strategies of Transportation Systems Management including impacts of development on the Monterey-Salinas Transit line that serves Highway 68, and any necessary mitigation such as ridesharing and park and ride lot locations.

Response: In a subsequent discussion, the A-95 Coordinator for the agency stated that their main concern is the impact/mitigation relating to transit service. Therefore, please refer to the response to Comment #14 above from the Monterey-Salinas Transit.

Comment #23: Mitigation measures on Page 74 should include: Improvement of ramps at Route 58 and River Road will be required to accommodate peak hour traffic volumes resulting from the proposals.

Response: See Response to Comment #8, Page R-3, paragraph 3.

Comment #24: It should be mentioned that where improvements to Highway 68 are required, an Encroachment Permit must be obtained from CALTRANS before work can be done within State right-of-way.

Response: The existing Encroachment Permit process, like local government's total permit process, can control mitigation to some degree during the specific design/development stage.

COUNTY PLANNING STAFF SUGGESTED CHANGES/CORRECTIONS SUBMITTED WITH RECOMMENDATION FOR CERTIFICATION ON 12/7/82

The following comments were received by the Board of Supervisors at the Certification Hearing on December 7, 1982: They have been included at the end of Appendix B of this Report.

Comment #25: Add the letters 'M' and 'N' to Table 1.2 on page 13 to reflect their inclusion on Exhibit 1.4 on page 10.

Response: A footnote at the bottom of Table 1.2 is hereby added to clarify that the acreage for areas 'M' and 'N' on Exhibit 1.4 is included in the total Open Space acreage.

Comment #26: The "dispersed park sites" described in the text at the bottom of page 11 and top of page 12 should be added to Exhibits 1.3 (page 9) and 1.4 (page 10) as appropriate.

Response: The precise location and design of the "dispersed park sites", like the residential lots, will be determined during the specific design/development stage. Exhibit 1.4 (ADC Policy Plan) does show the conceptual configuration of these parks.

Comment #27: Change all EIR references to "proposed" River Road ADC Criteria to read adopted River Road ADC Criteria, see page 21, 1st sentence of last paragraph for an example.

Response: It is acknowledged that the Board of Supervisors took action in setting forth the criteria (see 1.3.1.2, page 17). The criteria was part of the Board's action initiating a general plan amendment to define the River Road area as an ADC. Therefore, the River Road ADC, together with the criteria, is the alternative Proposed "project" for purposes of the EIR. If the ADC is not adopted, neither is the criteria.

Comment #28: Change number 2 under "public works" page 23 to read "The new streets for Las Palmas would be built by developers and may be dedicated to the County as completed.

Response: See (5) on Errata Sheet.

Comment #29: Add the following sentence to mitigation measure number 2 on page 54. "This program should take the form of an overall Las Palmas Ranch open space environmental management plan to be developed and be approved by the County before first development occurs."

Response: The suggestion is included in mitigation measure 3 on page 56 and by reference is hereby added to mitigation measure number 2 on page 54.

MEMORANDUM FROM TORO ADVISORY COMMITTEE - DATE 12/7/82

Receipt of these comments was acknowledged by the Board of Supervisors at the Certification Hearing on December 7, 1982. They have been included at the end of Appendix B of this report.

TABLE OF CONTENTS

	Page
1.0 INTRODUCTION	1
1.1 AUTHORIZATION AND PURPOSE	1
Authorization	1
Purpose	2
1.2 PROJECT DESCRIPTION	2
1.2.1 Location	3
1.2.2 Project Objectives	6
1.2.3 Characteristics of the Project	6
1.2.3.1 Background	6
1.2.3.2 Existing and Approved Improvements	7
1.2.3.3 Proposed Improvements for the Las Palmas Ranch	7
1.2.3.4 Existing and Approved Improvements	14
1.3 GENERAL PLAN AND ZONING	14
1.3.1 Planning Policy Analysis	14
1.3.1.1 Consistency With Existing Policies	14
1.3.1.2 Consistency With ADC Criteria	17
Consistency of the ADC Policy Plan with ADC Criteria	20
Consistency of the Existing Policy Plan with the ADC Criteria	21
1.4 PROJECT ECONOMICS	22
1.4.1 ADC Policy Plan	22
Cost Revenue Per Capita	22
Fire Protection	23
Police Protection	23
Public Works	23
1.4.2 Existing Policy Plan	24
2.0 ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES	26
2.1 INTRODUCTION	26
NO 2.2 GEOLOGY	27
SETTING	27
IMPACT	30
MITIGATION MEASURES	30
NO 2.3 SOILS	30
SETTING	30
Soil Capability Analysis	34
IMPACTS	39
Las Palmas Ranch	39
River Road ADC (Excluding Las Palmas Ranch)	41
MITIGATION MEASURES	42
Las Palmas Ranch	42
The River Road ADC (Excluding Las Palmas Ranch)	43
NO 2.4 HYDROLOGY	43
SETTING	43
NO 2.4.1 Surface Hydrology	45
Las Palmas Ranch	45
River Road ADC (Excluding Las Palmas Ranch)	47
IMPACTS	47
Las Palmas Ranch	47
The River Road ADC (Excluding the Las Palmas Ranch)	48

Page

MITIGATION MEASURES 48
Las Palmas Ranch 48
2.4.2 Groundwater 49
IMPACTS 49
MITIGATION MEASURES 50
2.5 VEGETATION AND WILDLIFE 50
2.5.1 Vegetation 50
SETTING 50
Las Palmas Ranch 50
The River Road ADC (Excluding Las Palmas Ranch) 53
IMPACTS 53
Las Palmas Ranch 53
The River Road ADC (Excluding Las Palmas Ranch) 54
MITIGATION MEASURES 54
2.5.2 Wildlife 54
SETTING 54
Las Palmas Ranch 54
The River Road ADC (Excluding Las Palmas Ranch) 55
IMPACTS 55
MITIGATION MEASURES 56
2.6 AESTHETICS 56
2.6.1 VISUAL SETTING/IMPACTS 56
Las Palmas Ranch 56
The River Road ADC 58
MITIGATION MEASURES 58
2.6.2 Noise 59
SETTING 59
IMPACT 60
MITIGATION MEASURES 62
2.7 TRAFFIC 63
SETTING 63
IMPACTS 66
MITIGATION MEASURES 74
2.8 AIR QUALITY 75
SETTING 75
IMPACT 76
MITIGATION MEASURES 78
2.9 PUBLIC SERVICES AND UTILITIES 79
2.9.1 Wastewater Management 79
SETTING 79
Las Palmas Ranch 79
River Road ADC 79
IMPACTS 81
Las Palmas Ranch 81
The River Road ADC 83
MITIGATION MEASURES 83
2.9.2 Water Service 85
IMPACTS 85
MITIGATION MEASURES 86

Page

2.9.3 Schools 88
SETTING. 88
Las Palmas Ranch 88
IMPACTS. 89
Las Palmas Ranch 89
The River Road ADC 90
MITIGATION MEASURES. 91
2.9.4 Fire Protection 93
SETTING. 93
IMPACTS. 94
MITIGATION MEASURES. 95
2.9.5 Police Protection 97
SETTING. 97
Las Palmas Ranch 97
IMPACTS. 97
MITIGATION MEASURES. 98
2.9.6 Public Utilities/Energy 99
SETTING. 99
IMPACT 99
Las Palmas Ranch 99
The River Road ADC 100
MITIGATION MEASURES. 101
2.9.7 Energy Conservation 103
2.10 ARCHAEOLOGICAL/HISTORICAL. 103
IMPACTS. 104
Las Palmas Ranch 104
The River Road ADC 104
MITIGATION MEASURES. 105

3.0 ENVIRONMENTAL EVALUATION. 106
3.1 CUMULATIVE IMPACTS. 106
3.2 UNAVOIDABLE ADVERSE IMPACTS 109
3.3 PROJECT ALTERNATIVES. 109
3.3.1 No Project. 109
3.3.2 Alternative Location. 110
3.4 GROWTH INDUCEMENT 110
3.5 IRREVERSIBLE ENVIRONMENTAL CHANGES. 111
3.6 SHORT-TERM USE VERSUS LONG-TERM PRODUCTIVITY. 112

4.0 REFERENCES. 113
4.1 LITERATURE. 113
4.2 PERSONS AND AGENCIES. 114

APPENDICES

APPENDIX A - Initial Studies
1 - Proposed River Road Area of Development Concentration
2 - Las Palmas Specific Plan

APPENDIX B - Letters of Comment Received On:
1 - EIR 80-100 Las Palmas Ranch Specific Plan
2 - EIR 81-113 River Road Area of Development Concentration

EXHIBITS

	Page
EXHIBIT 1.1 - Regional Setting of the River Road Area of Development Concentration	4
EXHIBIT 1.2 - River Road Area of Development Concentration	5
EXHBIIT 1.3 - Existing Policy Plan	9
EXHIBIT 1.4 - The ADC Policy Plan.	10
EXHIBIT 2.1 - Slope Analysis	28
EXHIBIT 2.2 - Soils Map.	33
EXHIBIT 2.3 - Soil Capability.	35
EXHIBIT 2.4 - The ADC Soils Map.	38
EXHIBIT 2.5 - Basin Profiles	44
EXHIBIT 2.6 - Flood Plain Mapping.	46
EXHIBIT 2.7 - Vegetation	51
EXHIBIT 2.8 - Traffic Volumes & Directional Split.	65
EXHIBIT 2.9 - 1995 Projected Traffic Volumes	69
EXHIBIT 2.10- Wastewater Management Study - Las Palmas Ranch	82

TABLES

	Page
TABLE 1.1 - Properties Within The River Road ADC	8
TABLE 1.2 - Land Use By Acres.	13
TABLE 2.1 - Slope of Las Palmas Ranch.	27
TABLE 2.2 - Las Palmas Ranch Soils Analysis.	31
TABLE 2.3 - Soil Capability Analysis	34
TABLE 2.4 - Additional Soils of the River Road ADC	37
TABLE 2.5 - Project Emissions.	77
TABLE 2.6 - Projection of Air Pollution Emissions.	78
TABLE 2.6 - Las Palmas Ranch Student Generation.	89
TABLE 2.7 - River Road ADC Student Generation.	90
TABLE 2.8 - Annual Electricity & Natural Gas Consumption	100
TABLE 3.1 - Toro Area Projects	107

1.0 INTRODUCTION

1.1 AUTHORIZATION AND PURPOSE

Authorization

On October 23, 1979, the Monterey County Board of Supervisors authorized the preparation of a Specific Plan for the Las Palmas Ranch in accordance with State Planning Law and local ordinance requirements. Preparation of an Environmental Impact Report (EIR) for the Specific Plan was also authorized on that date in keeping with the California Environmental Quality Act (CEQA).

On May 13, 1980, the Monterey County Board of Supervisors contracted with Grunwald, Crawford & Associates to prepare the above referenced Specific Plan and EIR.

On November 18, 1980, the Monterey County Board of Supervisors initiated a proposed General Plan Amendment establishing the River Road Area of Development Concentration (ADC).

On April 14, 1981, the Monterey County Board of Supervisors amended the above referenced contract with Grunwald, Crawford & Associates to include in the above referenced EIR an environmental analysis of a 1578 unit development plan[1] (proposed by the Las Palmas Ranch Partnership, the owners) as it conforms to the ADC concept.

On July 21, 1981, the Monterey County Board of Supervisors ordered the preparation of a focused EIR for the proposed River Road Area of Development Concentration.

---

(1) "Las Palmas Ranch Development Plan and Environmental Impact Study", and amendments prepared by Alden W. Barstad & Associates, Inc.

On November 3, 1981, the Monterey County Board of Supervisors amended the above referenced contract with Grunwald, Crawford & Associates to include preparation of the focused EIR for the proposed River Road Area of Development Concentration.

Purpose

This EIR has been prepared pursuant to the requirements outlined in the Monterey County CEQA Guidelines, Sections 704, 705 and 906. It discusses the impacts of the projects, suggests measures to reduce or alleviate identified concerns and is provided solely to assist in project evaluation.

Public Resources Code Section 6543(b) provides that in the absence of substantial change in the project, the EIR certified for this ADC will serve as a "master" EIR for all residential development.

As a result of Monterey County staff input, the Initial Study, the Notice of Preparation, and the consultant's environmental review, the following areas of impact are included in the EIR:

1. Traffic and Circulation.
2. Geology and Soils (including prime ag land).
3. Air Quality.
4. Vegetation and Wildlife.
5. Hydrology (surface hydrology, urban drainage, groundwater).
6. Archaeological/Historical Resources.
7. Aesthetic Considerations (visual, noise, odor).
8. Energy Conservation.
9. Public Services and Utilities (Sewer, Water, Schools, Fire Protection, Police Protection, Public Utilities, Solid Waste).
10. Economic Considerations.
11. Growth Inducing Impacts.
12. Cumulative Impacts.

The Initial Study is included as Appendix "A".

1.2 PROJECT DESCRIPTION

This EIR addresses the proposed River Road Area of Development Concentration (ADC) as the overlying project with two alternative specific plans considered

for the Las Palmas Ranch portion of the ADC area. The Ranch is the only significantly large ownership within the ADC area that is not already committed to development other than agriculture.

The proposed Las Palmas Ranch Specific Plan prepared by the consultant and based on existing general plan policies is referred to throughout this EIR as the Existing Policy Plan. The Las Palmas Ranch Specific Plan prepared by the owners of the Ranch and based on the County's adopted criteria for proposed new "areas of development concentration" is referred to throughout this EIR as the ADC Policy Plan.

1.2.1 Location

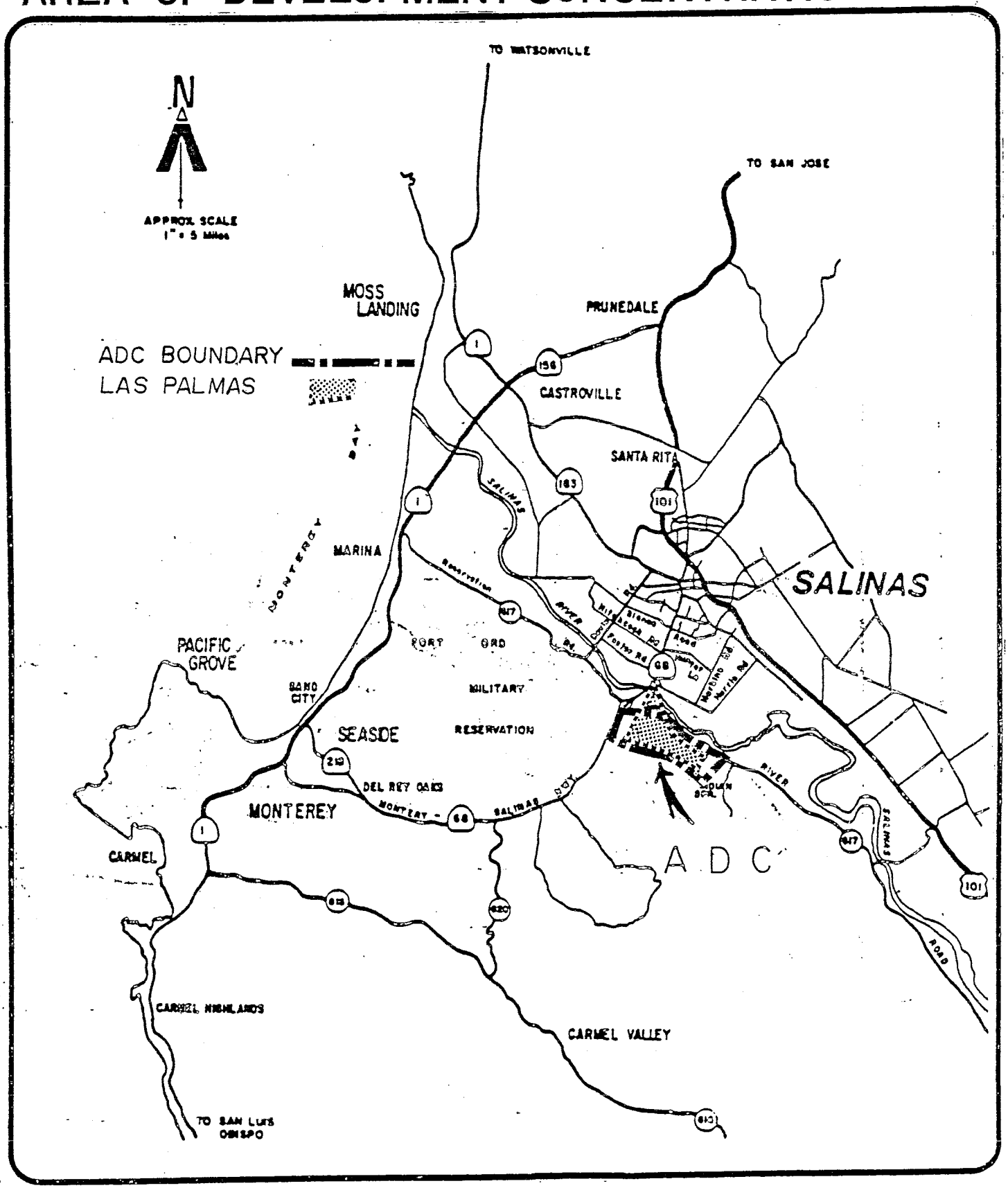
The designated boundaries of the proposed River Road ADC are River Road, State Highway 68, Toro Regional Park and Pine Canyon Road. Exhibit 1.1 shows these boundaries within the regional setting. Exhibit 1.2 depicts the portion of the Las Palmas Ranch that is within the proposed River Road ADC.

The Las Palmas Ranch portion in the ADC comprises 1,523 acres fronting on River Road approximately one-half mile south of its intersection with State Highway 68. It is also known as the Violini Ranch, APN 139-011-5 and 139-012-2, 4, 5, 6, 7, 8, and 10. The City of Salinas is approximately three miles north; the Monterey Penninsula area is approximately ten miles west. The Fort Ord Military Reservation is northwest of the Ranch across Highway 68. To the southeast is developing residential property and the rugged hills of the Sierra de Salinas. The Ranch is bounded on the north by River Road, agriculture land and the Salinas River. On the western border, separating Las Palmas from Highway 68, is the former Ferrini Ranch for which the Toro Vista Specific Plan and supplemental EIR were recently prepared.

The southwestern boundary of the Ranch fronts on undeveloped mountainous range-

REGIONAL SETTING OF THE RIVER ROAD AREA OF DEVELOPMENT CONCENTRATION

EXHIBIT 1.1



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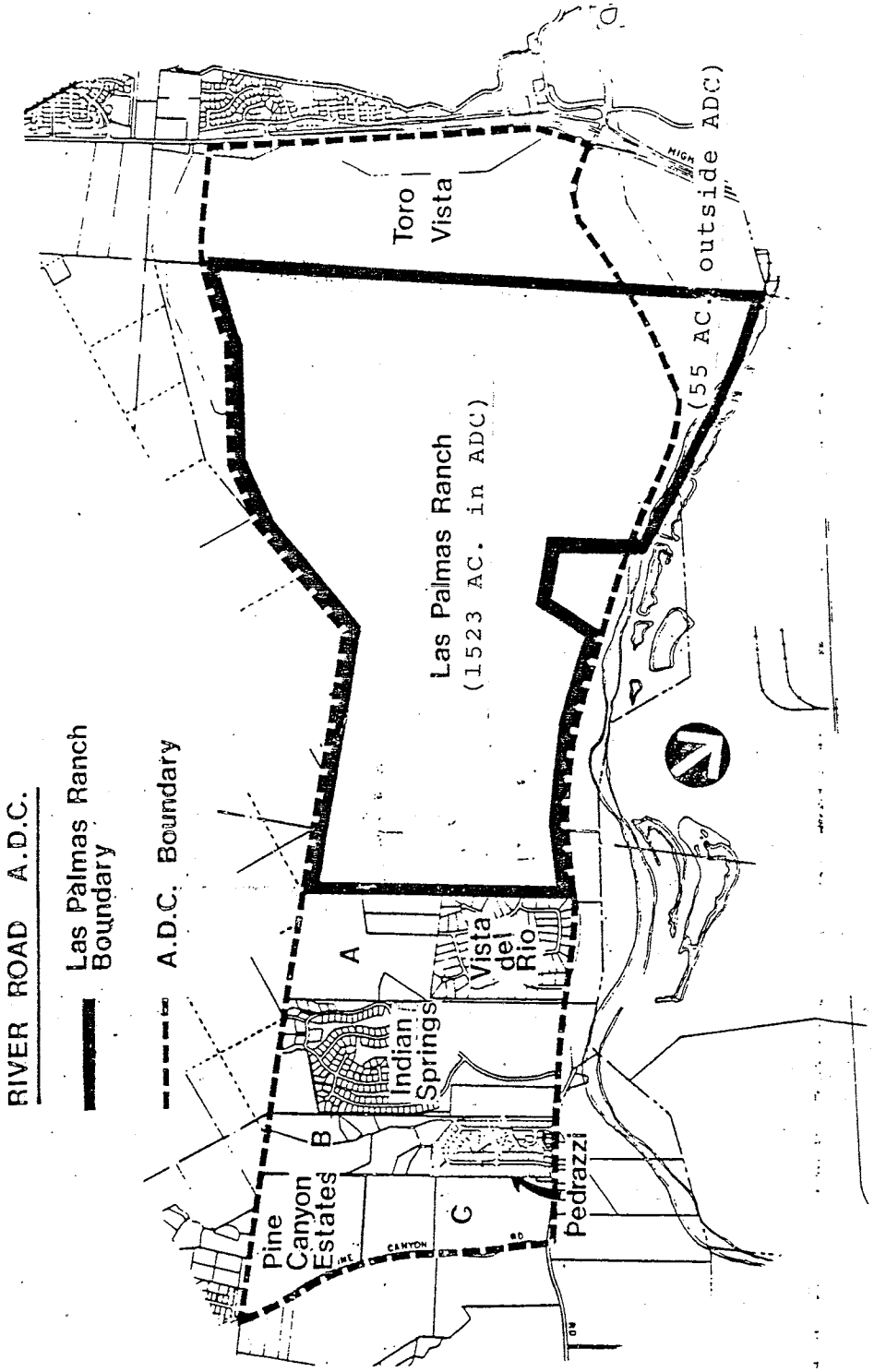
607

RIVER ROAD
AREA OF DEVELOPMENT CONCENTRATION

EXHIBIT 1.2



LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

GRUNWALD CRAWFORD ASSOCIATES

land and the Toro Regional Park. The southeastern boundary is adjacent to Vista Del Rio, a residential development consisting of 80 one-acre lots. Other perties to the southeast are the Indian Springs Ranch Subdivision and the Pedrazzi subdivision..

1.2.2 Project Objectives

The objective of the proposed project is to develop the Las Palmas Ranch with a mixture of residential units and support facilities in keeping with either the land use policies of the existing general plan or the criteria/policies for an Area of Development Concentration as set forth in the County's Growth Management Policy.

1.2.3 Characteristics of the Project

1.2.3.1 Background

The history of the area, known as the Buena Vista area, is documented back to 1795 when the first known occupants in the area were Jose Maria Soberanes and his father-in-law, Joaquin Castro. A land dispute arose, with ownership claimed by Father Vinals of Mission San Carlos; the family lost the land in 1802.

About 1822 then Governor Sola gave the land grant to Santiago and Jose Mariano Estrada, who reportedly built an adobe which had a long history as an arsenal, fiesta hall and school. Crumbling remains of the adobe are still visible on the east end of the Las Palmas Ranch.

In 1872 Hiram Corey leased 7,725 acres of the Buena Vista Ranch and established a stock ranch, purchasing the land in 1883. In 1889 he sold the ranch, but repurchased 1,620 acres on the Salinas River to make his home in picturesque surroundings, now known as the Las Palmas Ranch. In 1891 he built a residence of grand architectural proportions and it was one of the show places of the county. This house remains as a residence for the Violini family on the Ranch.

1.2.3.2 Existing and Approved Improvements

Existing improvements, and approved subdivisions in various stages of development, that are located in the proposed River Road ADC are shown in Exhibit 1.2. Also shown is that portion of the Toro Vista Specific Plan which is within the ADC. The existing and approved developments located in the ADC total 752 acres and consist of 676 residential units. Table 1.1 describes these projects.

The most prominent feature on the Las Palmas Ranch is the old Victorian ranch house built by Hiram Corey and referred to as the Corey House. It has been partly restored and is to remain as part of the future development. There is also a smaller farmhouse and barn at the eastern edge of the Ranch. About 88 acres are cultivated for row crops, of which 55 acres lie north of River Road (outside of the proposed ADC) and 33 acres south of River Road. The remainder of the site, other than that for dirt roads and fencing, has been used for grazing.

1.2.3.3 Proposed Improvements for the Las Palmas Ranch

The Las Palmas Ranch with 1578 acres contains about 90% of the undeveloped open space in the proposed ADC.

Both the Existing Policy Plan and the ADC Policy Plan reports are incorporated here by reference as part of this EIR.

The overall development concepts for the Existing Policy Plan and the ADC Policy Plan as shown in Exhibits 1.3 and 1.4 respectively, are very similar in terms of types of uses, circulation systems, areas of development and service facilities. The primary difference is residential densities. The Existing Policy Plan provides for 720 residential units while the ADC Policy Plan shows 1578.

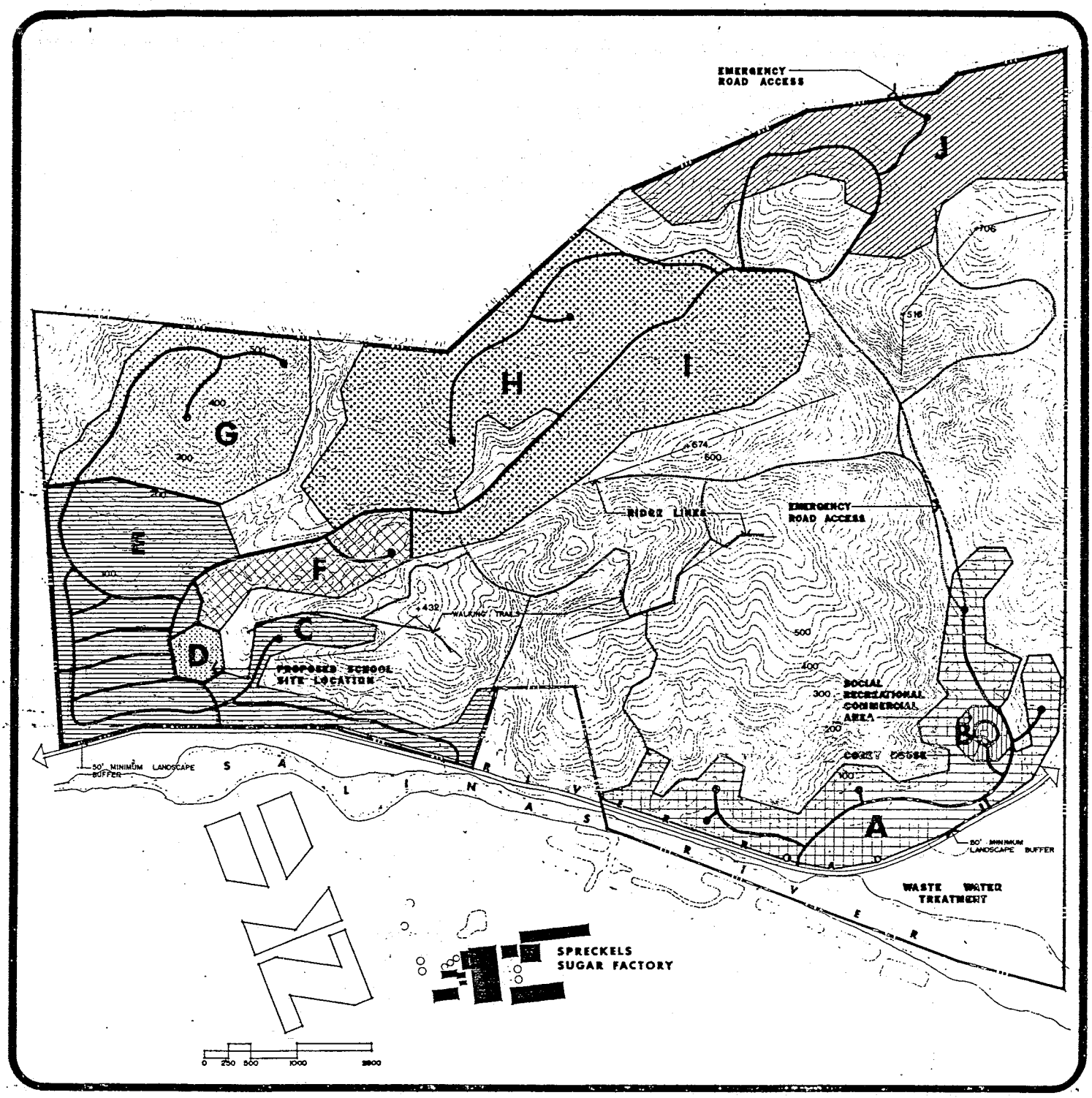
The following describes general features and concepts common to both plans:

TABLE 1.1

PROPERTIES WITHIN THE
RIVER ROAD ADC

Property	Acres	Units
Las Palmas Ranch	1,523	1,578 - 720
Toro Vista (approved)	336	324
Vista Del Rio (approved)	93.7	80
Pine Canyon Estates (approved)	88	60
Pedrazzi Subdivision (existing)	47	94
Indian Springs (approved/partially built)	187	150
Parcel "A"	105	105*
Parcel "B" (approved)	72	20
Parcel "C" (to be ag)	77	-
Total	2,538.7	2,411 - 1,553

* 1 unit/acre per River Road ADC

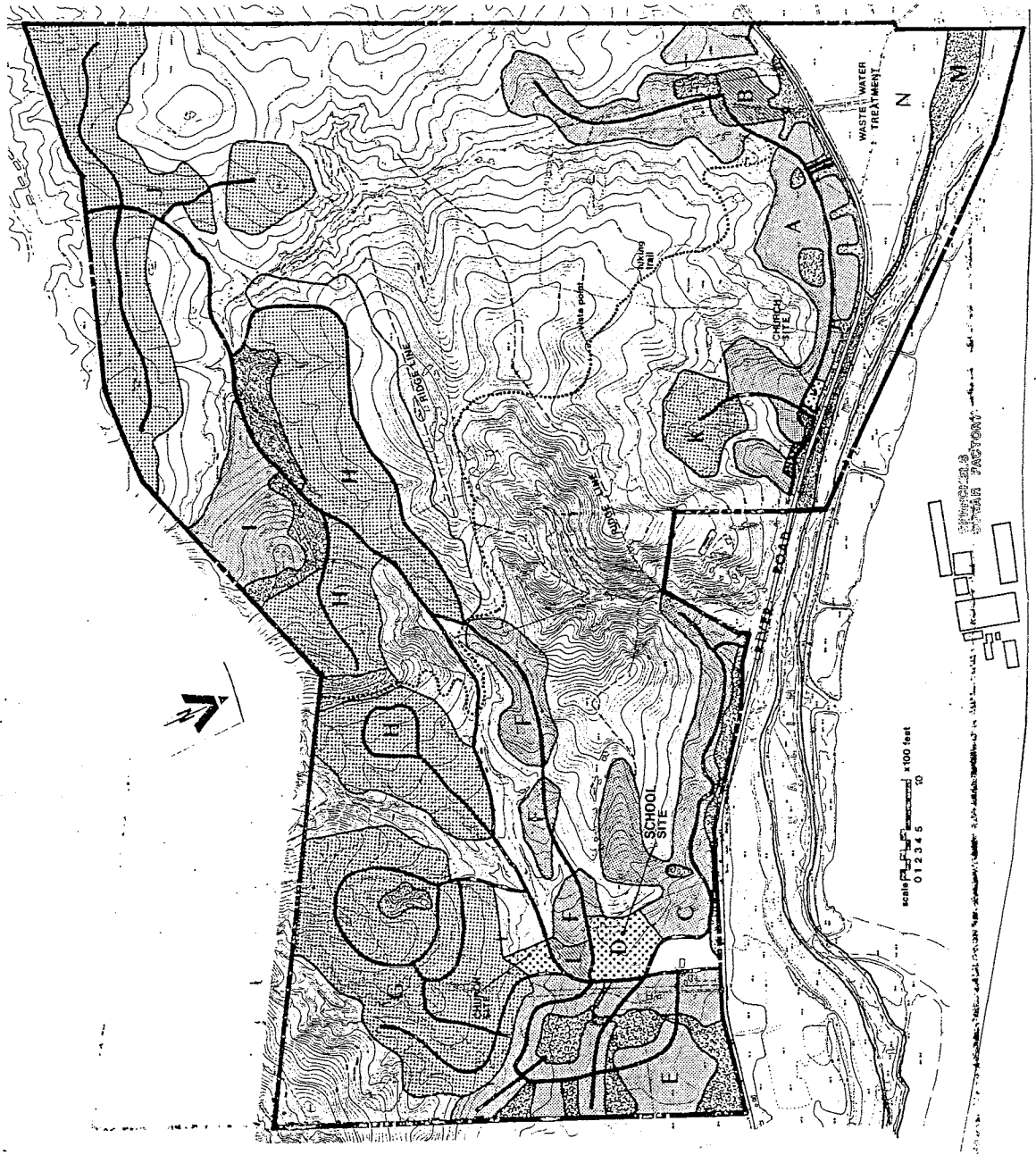


EXISTING POLICY PLAN

LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

GRUNWALD CRAWFORD ASSOCIATES



A.D.C. POLICY PLAN

LEGEND

- LOW DENSITY RESIDENTIAL
- MEDIUM DENSITY RESIDENTIAL
- QUASI - PUBLIC
- RECREATIONAL COMMERCIAL
- PARKS / RIPARIAN

LAS PALMAS

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1. Las Palmas Ranch would be developed as a planned community with a mixture of residential densities and supportive recreational facilities.

2. A combination of multi-family dwellings are shown near major entrances on the lowest slopes.

3. Residential lots for detached single-family units are planned for the low lying and moderate/mid elevation slopes.

4. Building sites of one acre or more are shown on the moderate/mid elevation slopes.

5. The land lying north of River Road and within the 100 year flood plain is designated agricultural. Approximately 30 acres surrounding the Corey house, which has been farmed in the past, are proposed for development.

6. As a planned community development, the plans take advantage of the clustering and density transfer concepts inherent within the planned development approach. Clustered multi-family and single family housing areas have been shown at much higher densities than the general one-acre minimum parcel size limitations of the majority of the underlying zoning. More than 50% of the site in both plans is for non-residential open use.

7. Both show a commercial area in the vicinity of the Corey House as a part of the recreation complex serving the residents of Las Palmas.

8. Recreation would be provided through conversion of the Corey House to a social use complex. Surrounding the Corey House would be additional sports activities including swimming and tennis. Several dispersed

park sites, the large area set aside in open space, and the abutting Toro Regional Park, will provide recreational opportunities.

9. Four access roads onto River Road are planned: one at the entrance to the Corey House, two near the mid-point of the property, and the fourth approximately one mile farther east on River Road. The internal road systems are to follow natural contours to the extent possible.

10. The greatest densities have been proposed in 0-10% slope areas that have ready access to River Road. On more steeply sloping properties (10-30%) larger lot building sites are shown. Generally, open space is the predominant use on slopes greater than 30%.

11. Visual impact upon the Salinas Valley and Highway 68 is to be minimized through landscape screening and by developing in areas screened from view by the natural contours of the land.

12. A master landscaping plan is proposed to include visual screening along River Road and internal landscaping within the clustered residential areas. The large area set aside as open space will act to conserve the natural grassland and tree growth.

13. The major circulation system would be unobtrusive for the most part, by keeping it in the lower, least visable areas of the canyon floors, thus minimizing the need for exterior cuts and fills and hillside disruption.

14. In applying the same suggested suitability/capability approach, both plans utilize nearly the same development areas. However, the Existing Policy Plan designates certain of the areas as "optional" because not as much land area is needed.

Table 1.2 shows a comparison between the Existing Policy Plan and the ADC Policy Plan in terms of types of units and acreage.

TABLE 1.2

LAND USE BY ACRES

EXISTING POLICY PLAN

Area	Acres	Housing Units	Housing Units/Acre
A	94	350	3.7
B	6.5	-	-
C	67	66	1.0
D	10	-	-
E	108	150	1.4
F	39	40	1.0
G	67	34	0.5
H	126	50	0.4
I	94	optional	-
J	90	30	0.3
Subtotal	701.5 (44.5%)	720	1.03
Open Space	876.5 (55.5%)	-	-
Total	1578.0	720	0.46

ADC POLICY PLAN

Area	Acres	Housing Units	Housing Units/Acre
A	104	495	4.76
B	6	Commercial/Recreation	-
C	62	244	3.94
D	15	School and Church	-
E	76	171	2.25
F	35	200	5.71
G	95	128	1.35
H	152	156	1.02
I	28	136	4.86
J	90	43	0.48
K	11	5	0.45
L	3	Commercial	-
Subtotal	677 (42.9%)	1578	2.33
Open Space	901 (57.1%)	-	-
Total	1578	1578	1.00

1.2.3.4 Vicinity and Neighboring Land Use

Three subdivisions lie to the northwest of the proposed ADC, on the opposite side of Highway 68 - Toro Park Estates, Serra Village, and Creekside. These include single family detached residences and townhouses, and a small neighborhood shopping center. Fort Ord is located to the west of these three subdivisions.

The Salinas River is located north of the proposed ADC beyond which lies the City of Salinas. The area between the City limits and the River consists of a 2-mile wide belt of agricultural land. River Road separates a narrow band of farmland south of the Salinas River from the area proposed for development.

The large St. Johns College parcel and the Toro Regional Park, which are immediately southwest of the proposed ADC, are presently in open space and used for hiking, picnicking and group camping; on the east is livestock grazing land; and to the southeast is the Alta Vista Subdivision.

1.3 GENERAL PLAN AND ZONING

1.3.1 Planning Policy Analysis

1.3.1.1 Consistency With Existing Policies

A basic requirement in the work program for the preparation of the Specific Plan for the Las Palmas Ranch (Existing Policy Plan) was that the plan must be consistent with existing general plan policies. Therefore, an extensive analysis of Monterey County's planning policies (and zoning) affecting the Las Palmas area was conducted. The results were published in September, 1980, in the report titled "Las Palmas Basic Determinants For Plan Preparation". That report was reviewed at a citizens' meeting and with the County Planning Commission, and

found to be complete in accordance with the program(1). It is incorporated here by reference.

The following are the major policy related documents analyzed:

Toro Area Master Plan
Monterey County General Plan
Monterey County Growth Management Policy
State Office of Planning and Research's conditions for General Plan update time extension
Monterey County Board of Supervisors' finding of plan consistency.

The summary of findings, conclusions and recommendations from the study, which guided the preparation of the proposed Existing Policy Plan are contained in Section V of the "Basic Determinants Report". For ease of reference and because the major issue is the number of residential units to be allowed, the recommendations from the report are repeated here:

"1. The number of units indicated for Las Palmas based on an analysis of the Toro Area Master Plan is in a range of 343-535. If these numbers constitute 85% of the total project for purposes of providing 15% for low and moderate income housing, then the range increases to 404-629.

2. Given the environmentally related policies expressed in the Toro Area Master Plan and as more specificially stated in other elements of the General Plan and in deliberations by the County Board of Supervisors regarding Las Palmas, the holding capacity (about 720 units) identified by the capability/suitability analysis should be used as an additional criteria in arriving at the number of units considered to be within the realm of consistency. Since this number is based on environmental considerations, the 15% for low and moderate income housing is included.

3. In order to be consistent and to meet the objectives of the applicant, to extent possible, the highest possible range indicated by recommendations No.'s 1 and 2 above is approximately 630-720. This range includes provision of 15% for low and moderate income housing. This 14% spread is not considered to be significant given the overall size and topography of Las Palmas, and the fact that over 55% of the total ownership would remain in open space even when using the high end of the range.

4. Therefore, it is reasonable to conclude that any number in the above range falls within the realm of consistency insofar as the stated and implied intent of the Toro Area Master Plan as presently interpreted and in consideration of OPR's conditions for General Plan revision extension."

(1) Planning Staff memo to Consultant dated January 2, 1981.

There are two land use proposals on the Existing Policy Plan which do not appear on the Toro Area Master Plan diagram: 1) use of approximately 33 acres of agricultural land for residential development, and 2) a proposed small commercial area in the vicinity of the Corey House.

The 33 acre parcel, located in Area A on the Plan, is bordered on the north by River Road and on the south by foothills. It has been farmed in row crops, most recently in onions. The Toro Area Master Plan designates the area as Range Land/Agriculture with a residential density range of 3-5 acres/unit. The proposed overall average density in Area A is 3.7 units/acre.

The major issue is the consistency with the County's policy of preserving prime and productive agricultural land in the Salinas Valley. Whether or not the loss of this particular parcel for farming is inconsistent is a matter of policy interpretation by the Board of Supervisors. The author's rationale for showing residential development on the parcel is presented in the Existing Policy Plan report.

The author's rationale for designating Area "B" (6.5 acres) surrounding the Corey House for social, recreational and limited commercial use by the Las Palmas residents is also presented in the Existing Policy Plan report.

The proposed Existing Policy Plan appears to be generally consistent with the County's existing development policies. However, the consistency of the commercial use is a policy matter subject to Board determination.

The ADC Policy Plan is not consistent with existing development policies, particularly in terms of number of units (1578) and the proposal for a three acre commercial center near the east end of the Ranch in addition to the complex surrounding the Corey House. Determination of consistency of the ADC Policy Plan in the use of farmland for housing (33 acres) and sewage facilities (52

acres) is a matter of interpretation by the Board of Supervisors who found the plan to be conceptually consistent.

1.3.1.2 Consistency With ADC Criteria

On July 21, 1981, the Monterey County Board of Supervisors initiated a general plan amendment to define the River Road area as an area of development concentration with the following proposed criteria:

1. Existing or approved development within the River Road ADC shall be maintained or developed in accordance with existing or approved tentative or final subdivision maps, use permits or specific plans.

2. The basic residential density for new major subdivision development within the River Road ADC shall be one unit per gross acre except where topography, physical constraints or other factors would preclude this density. Development including septic systems shall not be allowed on slopes over 30%. Condominiums, town houses, zero lot line houses, and other forms of clustered or multifamily housing, shall be considered within this basic density where adequate utilities are abailable; and shall be encouraged where such development will help to protect public viewsheds, natural resources or prime agricultural lands, or will facilitate providing housing for families of low or moderate income.

3. Prime or productive agricultural lands shall be preserved and protected, where feasible.

4. New residential subdivisions within River Road ADC shall provide at least 15% of their units for families of low or moderate income.

5. New development within the River Road ADC shall be served by a public

utility water system or an incorporated mutual water company providing domestic and fire flows in accordance with all requirements of state and county environmental health agencies.

6. New residential subdivisions within the River Road ADC on lots of less than one acre shall be served by a community sewage treatment facility meeting all requirements of state and county environmental health agencies, and either owned or operated by a public agency or district.

7. Adequate police and fire protection shall be available at the time of development.

8. Appropriate school sites shall be provided.

9. In order to mitigate adverse impacts on significant view shed areas, the following standards shall be applied to new development within the River Road ADC:

   a. Ridge top development shall be prohibited.

   b. Low level exterior lighting, including streetlights, shall be utilized consistent with maintenance and public safety requirements.

   c. Roads which are perpendicular to viewing areas or which involve excessive cut or fill shall be discouraged.

   d. Visually obtrusive building materials and finishes shall be avoided.

   e. Higher density housing units shall be clustered behind natural land forms or be visually compatible and unobtrusive.

   f. Utilize mounding, informal massing or irregularly spaced trees, planting, and other overall landscaping treatment to screen development.

g. Preserve vegetation significant to maintaining visual quality and to provide erosion control on sensitive slopes.

10. Erosion, siltation and drainage controls shall be implemented in order to enhance watershed management, to protect on-site and riparian vegetation, to maximize retention and percolation or surface water on-site and minimize hazards to development.

11. An irregular or meandering landscaped setback, with a minimum depth of 50', shall be established along the frontage of River Road.

12. Provide centrally located commercial facilities appropriate to meet the convenience needs of residents of the River Road ADC. Such facilities shall be developed under "Planned Commercial" or similar zoning which regulates uses, design and signing.

13. New residential subdivisions within the River Road ADC shall provide usable open space and recreational facilities for the residents of the subdivision.

14. Significant archaeological and historical sites shall be preserved and protected as cultural resources.

On November 3, 1981, the Board of Supervisors passed and adopted Resolution No. 81-546 amending the Monterey County General Plan by adopting the following definition of areas of developing concentration:

ESTABLISHMENT OF NEW AREAS OF DEVELOPMENT CONCENTRATION

New areas of development concentration shall, where appropriate, be encouraged if they can be shown to better achieve other aspects of growth management such as the preservation of prime agricultural lands or the protection of other natural resources. They shall provide urban services to the residences such as provision of water, sewage, roads, commercial facilities, schools and fire protection. Developments of this type should be proposed as Specific Plan amendments to the the General Plan.

The following criteria shall be used for the purposes of identifying any new "areas of development concentration" as that term is used in the Monterey County Growth Management Policy.

a) The area is not contiguous with existing urban concentations, but is in reasonably close proximity to an existing city or other employment center and contains existing semi-rural development.

b) The area has available or provision will be made for appropriate levels of public services to serve the higher intensity land uses proposed for Areas of Development Concentration.

c) The parcel sizes and ownerships of the undeveloped land within the area lend themselves to orderly higher intensity development rather than piecemeal or sprawl development. Such higher intensity development may be rural, suburban or urban in character, depending upon the natural resources, physical and environmental attributes, economic development and sociocultural development of the particular area.

d) A new area shall not under any circumstances be located where it may adversely impact significant prime or productive agricultural lands.

e) Protection and conservation of the natural resources of the overall planning area, epseically the scenic quality or rural areas and the preservation of prime agricultural land, will be enhanced by concentrating development within the designated area.

Once an area is recommended by the Board of Supervisors for designations as an area of development concentration, a General Plan Amendment shall be prepared. The amendment shall be in the form of a Specific Plan which specifies all intended land uses as well as development criteria. The criteria will recognize the diversity of needs and desires of the local area.

The location of the proposed River Road ADC clearly meets criterion (a) in the above Resolution No. 81-546. Criteria (b) and (c) could be met by the proposed Las Palmas ADC Policy Plan, particularly as it relates to proposed levels of public services.

Whether or not the River Road ADC complies with criterion (d) in the above resolution depends on the interpretation of the word "significant" as it relates to the 33 acres of productive agricultural land located within the Las Palmas Ranch portion of the proposed ADC. Criterion (d) also relates to the 55 acres of productive farmland located between River Road and the Salinas River. This area, which is across the road from the proposed ADC, could be adversely impacted by concentrated development in the River Road area. The possible impacts and ways to mitigate them to less than significant levels are discussed later in this report. Similar to the case of the 33 acres south of River Road, it will require a Board policy decision as to whether or not this 55 acre parcel is significant within the meaning of the above Resolution No. 81-546.

Consistency of the ADC Policy Plan with ADC Criteria

The Development Criteria for the River Road ADC, initiated by the Board of Supervisors, are embodied in the proposed ADC Policy Plan. The table "The Index to Policies Implementing ADC Criteria" shown on Page III-10 of the ADC Policy Plan demonstrates reasonable compliance with the criteria, with one possible exception. The one possible exception is Criterion #3 relating to preservation of agricultural land, where feasible. The feasibility of preserving the 33acres of the Las Palmas Ranch south of River Road that presently is in onions is a matter of interpretation: If the parcel is not considered to be significant agricultural land within the meaning of criterion (d) of the above Resolution No. 81-546, then the issue is the feasibility of continuing to farm this island of agricultural land if the River Road Area of Development Concentration is

approved. Two conditions would appear to make it infeasible:

1. There is a very limited amount of suitable land on Las Palmas Ranch where residential development can be clustered. Consequently, the 33 acres would be far more valuable for housing than for the present row crop operation. Approximately 150 residential units in the ADC Policy Plan are proposed to be concentrated on the parcel.

2. As a farm operation, the parcel would be bounded by River Road within the required 50 foot landscaped buffer (Criterion #11) on the north and by the foothills with medium to high density residential development on the south. Such an isolated, incompatible farm operation would also be fragmented by access roads traversing the 33 acres to connect the foothill residential area with River Road.

If the Board determines that use of the 33 acres for housing is inconsistent with Criterion #3 of the River Road ADC criteria, the housing units on the 33 acres could be redistributed to other areas of the Ranch.

Consistency of the Existing Policy Plan with the ADC Criteria

To the extent possible, the development criteria set forth in the proposed Existing Policy Plan are identical to the proposed criteria for the River Road ADC. Similar criteria were selected for two reasons: It will facilitate the comparative analyses of the alternative plans for Las Palmas Ranch, and secondly the criteria are considered sound specific planning guidelines regardless of differences in density between the two plans.

The Existing Policy Plan demonstrates reasonable compliance with the proposed development criteria, with one possible exception. The possible exception is the same as with the ADC Policy Plan which is the criterion calling for the preservation of agricultural land, where feasible. (The rationale for showing

residential use for the 33 acres of agricultural land near the Corey House is presented in the Existing Policy Plan report.)

1.4 PROJECT ECONOMICS

1.4.1 ADC Policy Plan

In December, 1981, LeBlanc & Company, Economic Planning Consultants of San Francisco, working with various County agencies, prepared a fiscal impact analysis for the ADC Policy Plan.(1) It is incorporated here by reference. The following summarizes major findings from the analysis:

Cost Revenue Per Capita:

1. The present assessed full market value of the Las Palmas Ranch is $4,578,000, yielding $47,020 in property taxes for current (1981-82) fiscal year.

2. The current Monterey County budget indicates that the operating cost for all county services county-wide is $391 per capita compared to operating revenues of $368 per capita.

3. The projected full market value of just the residential development (1578 units) is $173,320,000.

4. The revenues per capita generated from development of the ADC Policy Plan will be slightly in excess of per capita operating cost for county services ($423 vs $391 in 1981 dollars).(2)

5. At full development, the annual property tax yield to Monterey County is projected to be $520,000. The Salinas Rural Fire District would receive $234,000.

---

(1) Draft Fiscal Impacts Analysis for Las Palmas Ranch, LeBlanc & Company, December 1981.

(2) This assumes a relatively high assessed value per unit and a population at full development of 4200 persons.

Fire Protection

1. A new fire station may be needed when the River Road ADC is fully developed. It would cost $250 - $400,000 including land cost, and $300,000 annual operating budget for a three man crew. Capital cost would have to be funded through developer contributions or special assessments. The estimated assessed value of at full development of all potential units in the ADC, including 1578 on Las Palmas would be sufficient to generate the operating funds for the new station.

2. In the interim until full development, the operating budget for the new fire station could be reduced by volunteers, limited hours, special assessment or user fee.

Police Protection

1. At full development of the ADC Policy Plan the area would still be considered a low crime area, thus there would be no substantial increase in the Sheriff's Department costs.

2. At full development of the Toro planning area with a population of 10,000, it is conceivable that five sheriff deputies would be needed to provide 24 hour protection. The yearly operating cost would be $200,000 or $20 per capita.

Public Works

1. In keeping with County policy, Las Palmas Ranch development program includes formation of self supporting special districts for provision of public works construction and operating budgets.

2. The new streets for Las Palmas would be built by developers and dedicated to the County as completed.

3. Street maintenance by the County would be funded by gas tax and in lieu of motor vehicle taxes received from the State.

4. It is assumed that other public works (lighting, sewer system, etc.) will be totally funded through user fees.

The analysis concludes that the ADC Policy Plan should bring about a significantly positive fiscal impact to Monterey County public agencies. This is based on the following: 1) property tax yield generated by development at Las Palmas will be $40 to $50 per capita above the average yield; 2) the projected cost per capita for public services generated by Las Palmas residents will be considerably less than the average per capita county-wide; and 3) the assumption that required public infrastructure on-site and nearby (such as a fire station) will not require participation from the county general fund collections.

1.4.2 Existing Policy Plan

By comparison to the ADC Policy Plan, the existing Policy Plan, with about 46% as many housing units, (720 divided by 1578) will generate a higher per capita tax yield and about the same cost per capita for county services. This is based on the following:

1. The value per residential unit will probably be higher in having to build higher income housing in order to make the lower density project economically feasible.

2. Typically, higher income housing will have a lower population per household.

3. The tax yield per capita from the common open space portion of the Ranch will be higher because the population will be less than half.

4. Even with the lower density plan, a new fire station will apparently be needed when the River Road area is fully developed. Although the higher

value per unit will help make up the difference in generating the total assessed value necessary to support the annual operating cost of the new station, the cost per capita would be considerably higher.

5. With a considerable lower population with the Existing Policy Plan, the River Road area will certainly continue to be a low crime area and will not create a negative fiscal impact on the Sheriff's Department.

6. With less than half the number of daily auto trips, the lower density development should significantly reduce the cost of maintaining local streets and River Road. The gas tax per person and in lieu fees should be more than sufficient to maintain local roads.

7. It is also assumed in the case of the lower density plan that other public work activities (sewer, lighting, etc.) will be totally funded through user fees and thus have no financial impact on County government. However, the cost per unit would be considerably higher because the basic facilities (treatment plant, trunk lines, etc.) would still be required although with lower capacities. With 858 fewer units than the ADC Policy Plan, the economic feasibility of developing and operating a sewer system serving the entire River Road area would appear very questionable.

If the Existing Policy Plan is feasible in terms of marketability, it would have less fiscal impact on the county because of relatively fixed costs per capita but higher revenues per capita. However, the unknown is the marketability given the current housing demand.

2.0 ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

2.1 INTRODUCTION

This section describes the environmental setting followed by potential environmental impacts and mitigation measures. For each environmental concern, the existing setting for the Las Palmas Ranch is included with a general description of the setting for the larger River Road ADC. Environmental impacts and mitigation measures for the various components of the project are generally listed first for the Las Palmas Ranch site and then for the larger River Road ADC. Comparative analysis is used where appropriate. The regional setting of the ADC is shown in Exhibit 1.1.

Monterey County requires an environmental resources inventory be prepared for large project proposals detailing the existing setting according to the requirements of the California Environmental Quality Act. Thereby, environmental considerations are involved in project conceptualization and the information can be included in the required Environmental Impact Report which follows plan development. The Las Palmas Ranch Environmental Resources Inventory was prepared by Alden W. Barstad and Associates and accepted as complete by the County in January of 1978. The resources inventory is incorporated here by reference and is summarized according to subject matter in the descriptions of the environmental setting.

In addition, several independent engineering studies relating to the development of Las Palmas were contracted for by the Ranch owners and are on file at the County Planning Department. Certain of these, as identified throughout the report, will be summarized and incorporated by reference in this EIR. Such practice of incorporation by reference is encouraged by the CEQA Guidelines (Code Section 15149) in order to minimize volume without sacrificing comprehension.

2.2 GEOLOGY

SETTING

Topographic relief of Las Palmas Ranch is on the order of 660 feet rising from 40 feet at the northern-most corner to some 700 feet along the southwestern portion. Topography is characterized by northeasterly inclined slopes with one major canyon looping through the property (see Slope Map, Exhibit 2.1). Slopes are mostly moderate (less than 30%) with the exception of the steepness associated with the northern one-half of the major canyon. Wind and water eroding the parent material have created the existing slope as summarized in the following table:

TABLE 2.1

SLOPE OF LAS PALMAS RANCH

Slope Category	Area(Acres)	% of Total Acreage
0-10%	283	18
11-20%	488	31
21-30%	326	21
30%+	481	30
Totals	1,578	100%

The Ranch is located along the westerly edge of the Salinas Valley. The lower valley and ridge area of the site have non-marine Plio Pleistocene deposits and some Quaternary Alluvial deposits adjacent to River Road. The upper ridge portions of the site are underlain by Upper Miocene marine sandstone. Some river terrace deposits (Upper Pleistocene) were found along the southeasterly edge of the project area.

Oliver Bowen designates the Plio Pleistocene non-marine deposits as Paso Robles Formation and the Upper Miocene Formation as Santa Margarita sandstone (Tertiary) on his "Geological Map of Monterey and Salinas Quadrangles, 1969", California Division of Mines and Geology.

EXHIBIT 2.1

SLOPE ANALYSIS

- 0 – 10% SLOPE
- 10 – 20% SLOPE
- 20 – 30% SLOPE
- 30% AND ABOVE

LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

GRUNWALD CRAWFORD ASSOCIATES

631

A fault evaluation report prepared by Cooper and Clark[1] is incorporated here by reference. Following is the report summary:

> "The Las Palmas Ranch Geotechnical Evaluation identified the King City fault as possibly representing a surface rupture hazard at the site. Figure 4 of the Proposed Environmental Constraints Analysis of Monterey County, Part 1, Seismic and Geologic Hazards, identifies the Reliz (King City) - Rinconada fault as being potentially active (active faulting in the last three million years). Map F of the Seismic Safety Element of the Monterey County General Plan places a Hazard Zone VI around the King City fault and indicates that group rupture is a major hazard. Various investigators are in disagreement as to the existence, location and activity of the fault.
>
> The purpose of this study was to determine if the King City fault traverses the Las Palmas Ranch and, if it does, what its potential activity is. To resolve the potential surface rupture hazard, Cooper & Clark developed a fault evaluation study and outlined the approach in a letter to Las Palmas Ranch Partnership on January 14, 1981. In a memorandum dated January 24, 1981, the Monterey County Planning Department deemed the approach feasible.
>
> Deep, seismic reflection techniques were used to obtain a picture of site subsurface conditions. Two, 2300 foot long reflection traverses were run across the suspected fault trace at the north and south ends of the site by Cooksely Geophysics, Inc. of Redding, California, who also recorded, processed and interpreted the data obtained.
>
> Interpretation of the geophysical data shows no Holocene (see Geologic Time Scale) faulting and no significant faulting of any age at the site. A second, more liberal interpretation indicates the possibility of faulting at substantial depth beneath the site. However, the youngest units apparently offset appear to be mid-Pliocene (about 3.5 million years old) in age. Thus, even in a liberal interpretation, faulting at the site is no younger than mid-Pliocene and, as such, surface rupture hazards are nil.
>
> As discussed in the Geotechnical Evaluation, previous investigators have mapped a splay fault from the King City fault within the site. However, no evidence to support the existence of this fault was noted during our mapping of the site. Because of this and the geophysical evidence which suggests that the King City fault does not exist in the site area, we consider it unlikely that the splay fault exists. If confirmation of this conclusion were necessary, trenches could be excavated across the map location of the suspected fault during subsequent erosion and sedimentation studies for the projects."

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(1) "Las Palmas Ranch Fault Evaluation Study", May 20, 1981, by Cooper & Clark Consulting Engineers.

The major risk from seismic activity comes from the San Andreas Fault some sixteen miles northeast of the property. The Tularcitos Fault, eight miles to the southwest and the Navy Fault, seven miles to the west, are other potentially active nearby faults presenting seismic risk to Las Palmas.

The Monterey County Seismic Safety Element shows most of the property is within a "Relatively Unstable Upland" area where ground failure is typically moderate-to-high and locally severe. Ground shaking hazard is low to moderate.

IMPACT

A discussion of cumulative geologic impacts for the River Road ADC was omitted pursuant to the Initial Study (Appendix A).

The Cooper & Clark Fault Evaluation concludes that the King City Fault and a splay fault from the King City Fault do not exist in the site area. Therefore, no unusual fault conditions or impacts appear to be associated with the site.

The Monterey County Staff has accepted the Cooper and Clark reports as adequate but suggest that additional geologic work may be necessary if development is proposed on areas other than Las Palmas.

MITIGATION MEASURES

Since structural design requirements of the Uniform Building Code takes the seismic potential for the general area into account, no additional mitigation is indicated.

2.3 SOILS

SETTING

The twenty-one soil types found on Las Palmas Ranch are shown on Exhibit 2.2 and described in Table 2.2.

TABLE 2.2

LAS PALMAS RANCH SOILS ANALYSIS

SYMBOL	SOIL TYPE	ACRES	SLOPE(%)	RUNOFF	EROSION HAZARD	SOIL CREEP	LANDSLIDE	AGRICULTURAL CAPABILITY
1. AaC	Alto Silty Clay	1	2- 9	Medium	Slight			IIIe-5
2. AkD	Arnold Loamy Sand	24	9-15	Medium	Moderate			IVe-4
3. Am	Arnold-San Andreas Complex	24	50-75	Rapid	High	*	*	VIIe-1
4. Ba	Badland	110	Variable	Very Rapid	Very High		*	VIIIe-1
5. CaE	Chamise Shaly Loam	56	15-30	Rapid	High		*	IVe-1
6. CaF	Chamise Shaly Loam	3	30-50	Rapid	High			VIe-1
7. CbB	Chualar Loam	5	2- 5	Slow	Slight			IIe-1
8. DbE	Diablo Clay	16	15-30	Rapid	Moderate	*	*	IVe-5
9. EaA	Elder Sandy Loam	30	0- 2	Slow	Slight			IIs-4
10. GhC	Gloria Sandy Loam	1	2- 9	Slow	Slight			IIIe-3
11. LcG_2	Linne-Shedd Silty Clay Loam	24	50-75	Very Rapid	Very High	*	*	VIIe-1
12. LhE	Lopez Shaly Loam	70	15-30	Medium	High	*	*	VIIe-1
13. MnA	Mocho Silty Loam	170	0- 2	Slow	Slight			IIIe-1
14. PdD	Pfeifer Fine Sandy Loam	1	9-15	Medium	Moderate		*	IVe-1
15. PnA	Placentia Sandy Loam	8	0- 2	Slow	Slight			IIIs-3
16. PnC	Placentia Sandy Loam	84	2- 9	Slow	Slight			IVe-3
17. ScE	San Andreas Fine Sandy Loam	18	15-30	Rapid	Moderate		*	VIe-1
18. ScG	San Andreas Fine Sandy Loam	260	30-75	Rapid	High	*	*	VIIe-1
19. SdF	San Benito Clay Loam	14	30-50	Rapid	Moderate	*	*	VIe-1
20. ShE	Santa Ynez Fine Sandy Loam	391	15-30	Rapid	High	*	*	VIe-1
21. Xd	Xerorthents - Dissected	138	35-90	Rapid	High	*	*	VIIe-1
		1,578						

* Potential Exists

Source: United States Department of Agriculture, Soil Survey of Monterey County, 1978, and Cooper & Clark, "Final Report Phase I Geological Reconnaissance and Geologic Hazards Investigation, Las Palmas Ranch", November, 1980.

Soils represent variations of clay, sand and loams. Variations of loams are predominant and cover approximately 80% of the site. Badlands, a non-soil, xerothents and Arnold/San Andreas complexes cover 18% while only 2% of the site is silt clay and clay soils. Class II agricultural soils (Chualar Loam and Elder Sandy Loam) cover approximately 38 acres in the northwest portion of the property.

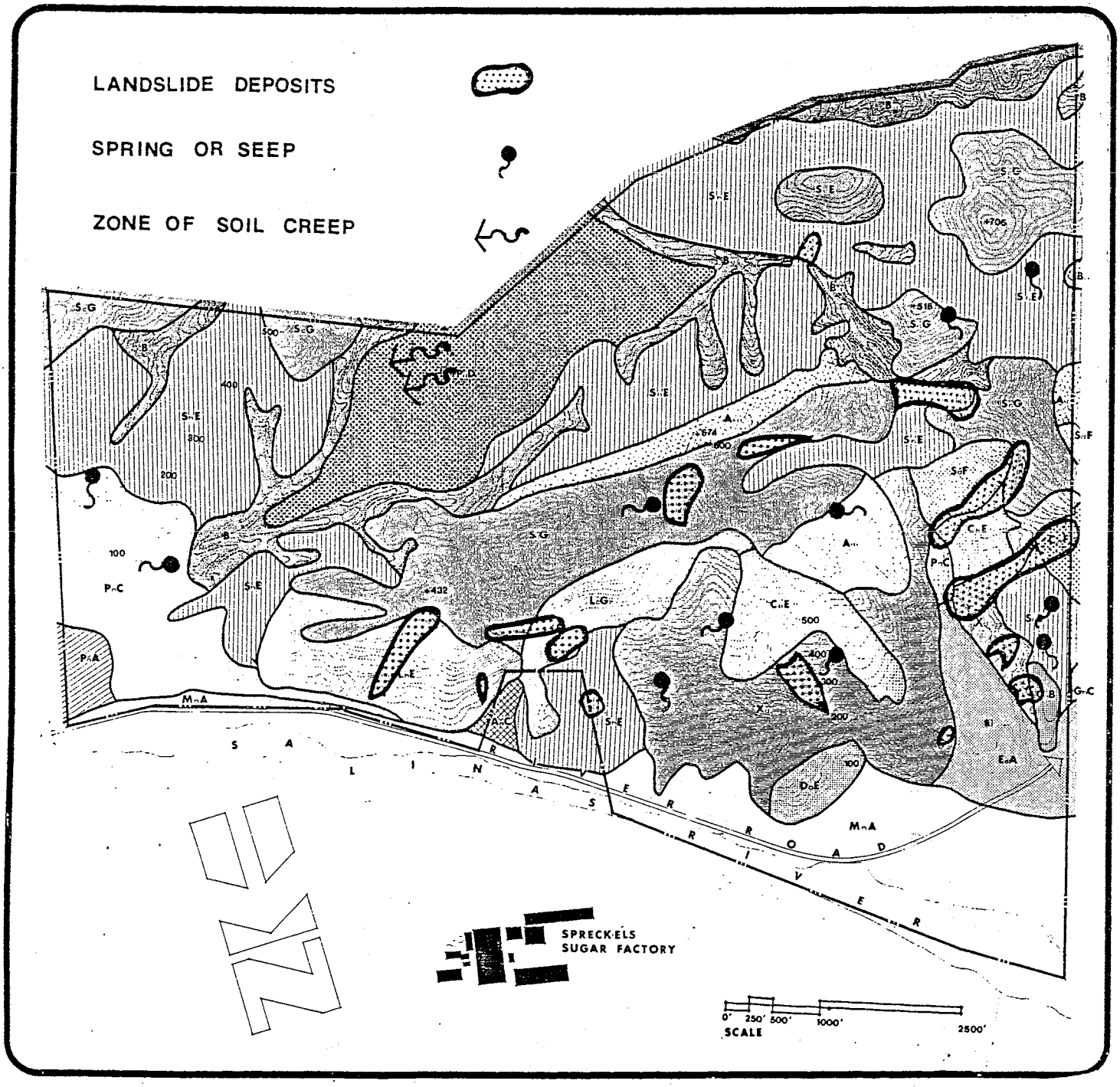
The most extensive soil type is Santa Ynez fine sandy loam which covers about 382 acres or approximately one fourth of the site.

Soils are typical of the foothill region with steeper slopes exhibiting poor agricultural capability, rapid run-off and high erosion hazard. The more moderate or flat sands are better suited to agriculture with slow to moderate run-off and slight erosion hazard. Because both alternative development plans propose a community sewage disposal system for the entire project, septic tank suitability was not analyzed.

With the exception of 88 acres at the northwest portion of the Ranch, all other soils are currently used for limited grazing, open space and watershed purposes. According to the applicant, 88 acres are currently under irrigated cultivation, 33 acres south of River Road and 55 acres north of River Road and adjacent to the Salinas River. This existing irrigated land is on Elder Sandy Loam, a Class II agricultural soil, and Mocho Silty Loam, a Class III agricultural soil. The cultivated land is considered prime farm land.

The geotechnical evaluation by Cooper and Clark(1) located several small landslides and erosion scarps on Las Palmas Ranch (Exhibit 2.2).

(1) "Final Report Phase I Geological Reconnaissance and Geologic Hazads Investigation - Las Palmas Ranch", November 1980, by Cooper and Clark Consulting Engineers.



SOILS MAP

SOILS TYPE							
A-C	ALTO SILTY CLAY	C-F	CHAMISE SHALY LOAM	M-A	MOCHO SILTY LOAM	S-E	SANTA YNEZ FINE SANDY LOAM
A--	ARNOLD LOAMY SAND	C-B	CHUALAR LOAM	P-A	PLACENTIA SANDY LOAM	X--	XERORTHENTS - DISSECTED
A--	ARNOLD - SAN ANDREAS COMPLEX	D-E	DIABLO CLAY	P-C	PLACENTIA SANDY LOAM	P-D	PFEIFER FINE SANDY LOAM
B--	BADLAND	E-A	ELDER SANDY LOAM	S-E	SAN ANDREAS FINE SANDY LOAM		
C-E	CHAMISE SHALY LOAM	G-C	GLORIA SANDY LOAM	S-G	SAN ANDREAS FINE SANDY LOAM		
		L-G	LINNE-SHEDD SILTY CLAY LOAM	S-F	SAN BENITO CLAY LOAM		
		L-E	LOPEZ SHALY LOAM				

LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

GRUNWALD CRAWFORD ASSOCIATES

Soil Capability Analysis - Central to the land use planning for the Las Palmas site was the analysis of the capability of various soils to withstand disturbance caused by development. This soil capability analysis was undertaken prior to the formulation of either the Existing Policy Plan or the ADC Policy Plan. It identified where development could be clustered in areas most suitable, leaving more hazardous areas in open space. With few exceptions, both land use plans closely correspond to the soil capability classifications.

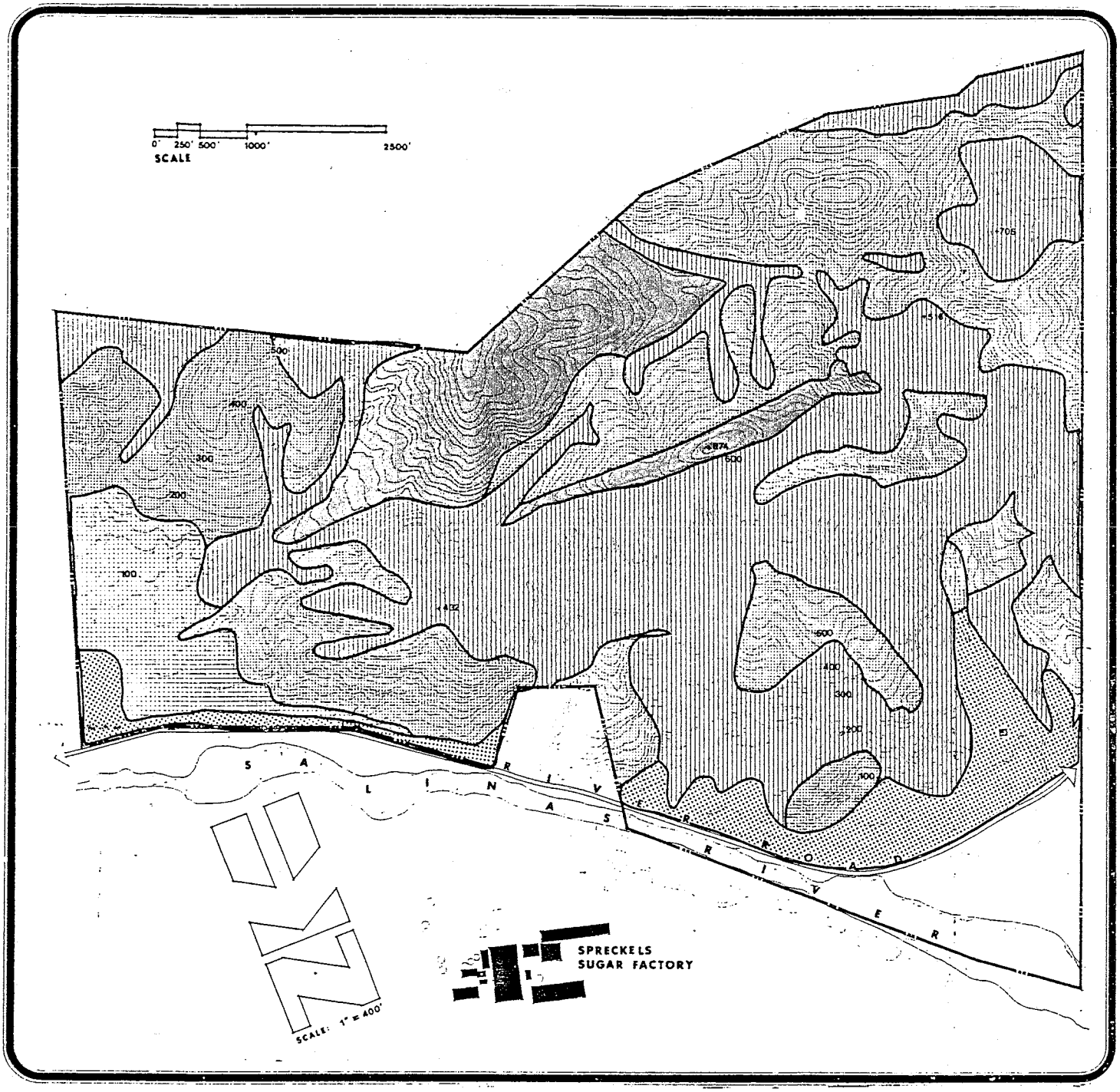
The methodology for analysis was developed by Robert G. Bailey in a report for the Tahoe Regional Planning Agency in 1974. Each soil type is placed in one of seven land capability classes by virtue of the soil's slope, erosion hazard and runoff potential. Table 2.3 classifies each soil by capability class; Exhibit 2.3 shows the results of this analysis.

TABLE 2.3

SOIL CAPABILITY ANALYSIS

SYMBOL	ACRES	SLOPE(%)	RUNOFF	EROSION HAZARD	SOIL CAPABILITY CLASS
AaC	1	2- 9	Medium	Slight	5
AkD	24	9-15	Medium	Moderate	4
Am	24	50-75	Rapid	High	1
Ba	110	Variable	Very Rapid	Very High	1
CaE	56	15-30	Rapid	High	3
CaF	3	30-50	Rapid	High	1
CbB	5	2- 5	Slow	Slight	7
DbE	16	15-30	Rapid	Moderate	3
EaA	30	0- 2	Slow	Slight	7
GhC	1	2- 9	Slow	Slight	6
LcG_2	24	50-75	Very Rapid	Very High	1
LhE	70	15-30	Medium	High	3
MnA	170	0- 2	Slow	Slight	7
PdD	1	9-15	Medium	Moderate	4
PnA	8	0- 2	Slow	Slight	7
PnC	84	2- 9	Slow	Slight	5
ScE	18	15-30	Rapid	Moderate	3
ScG	260	30-75	Rapid	High	1
SdF	14	30-50	Rapid	Moderate	1
ShE	391	15-30	Rapid	High	3
Xd	138	35-90	Rapid	High	1

Source: Grunwald, Crawford & Associates



SOIL CAPABILITY

LEGEND

OPEN SPACE	CLASS 1	
	CLASS 2	DOES NOT OCCUR
LOW DENSITY	CLASS 3	
	CLASS 4	
MOD. DENSITY	CLASS 5	
	CLASS 6	DOES NOT OCCUR
HIGH	CLASS 7	

LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

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The seven land capability classes, distinguished according to the relative risk of land damage or disturbance, are briefly defined as follows:

A. Lands That Should Remain in Their Natural Condition:

Class 1 - Highly Sensitive Areas - Soils in Class 1 have hazard characteristics that generally preclude development and restrict use to open space, conservation areas, and low-intensity recreation.

Class 2 - Does not occur at Las Palmas.

B. Lands That Are Permissive to Certain Uses But Not to Others:

Class 3 - Moderately Steep Slopes of 9% to 30% - These lands have moderate hazard characteristics that restrict their use to grazing and low density housing. Development in such areas must be carefully designed and carried out. Soils and landforms have moderate erosion hazard and moderately high to high runoff potential.

Class 4 - Moderately Steep Slopes of 9% to 30% - These lands have moderate hazard characteristics that restrict use to grazing and low density housing. Careful design and construction practices must be followed. Soils and landforms have moderate erosion hazard and low to moderately low runoff potential.

C. Lands That Are Most Tolerant to Urban Type Uses:

Class 5 - Gently Sloping Lands of 16% or Less - These lands have low hazard characteristics, but have some limitations on land disturbance, or require special conservation practices, or both. Soils and landforms have slight erosion hazard and moderately high to high runoff potential.

Class 6 - Gently Sloping Lands of 16% or Less - These lands have low hazard characteristics, but have some limitations that require moderate conservtion practices. Soils and landforms have slight erosion hazard and low to moderately low runoff potential.

Class 7 - Flat Valley Floors of 5% or Less - These lands have low disturbance hazard characteristics and have few limitations that restrict use. Soils and landforms have slight erosion hazard and low to moderately low run-off potential.

Las Palmas Ranch acreage within each soil capability class is as follows:

	Acres	%
No. 1	573	36.3
No. 2	Does Not Occur	
No. 3	551	34.9
No. 4	155	9.8
No. 5	85	5.4
No. 6	1	0.6
No. 7	213*	13.5
	1,578	

*This includes 55 acres north of River Road which are not in the proposed River Road ADC.

As can be seen, about 36% of the site is unsuitable for development using these criteria, while an additional 45% should be used only for limited development with stringent conservation practices. Only about 19% of the site, or 299 acres, is generally suitable for development with minimum environmental concerns.

The soil capability analysis is only as valid as the soil information upon which it is based. Because the soil survey is generalized, so too is the soil capability analysis. It should not be used as a rigid guide to development areas but rather as a design tool to help avoid the most environmentally sensitive areas.

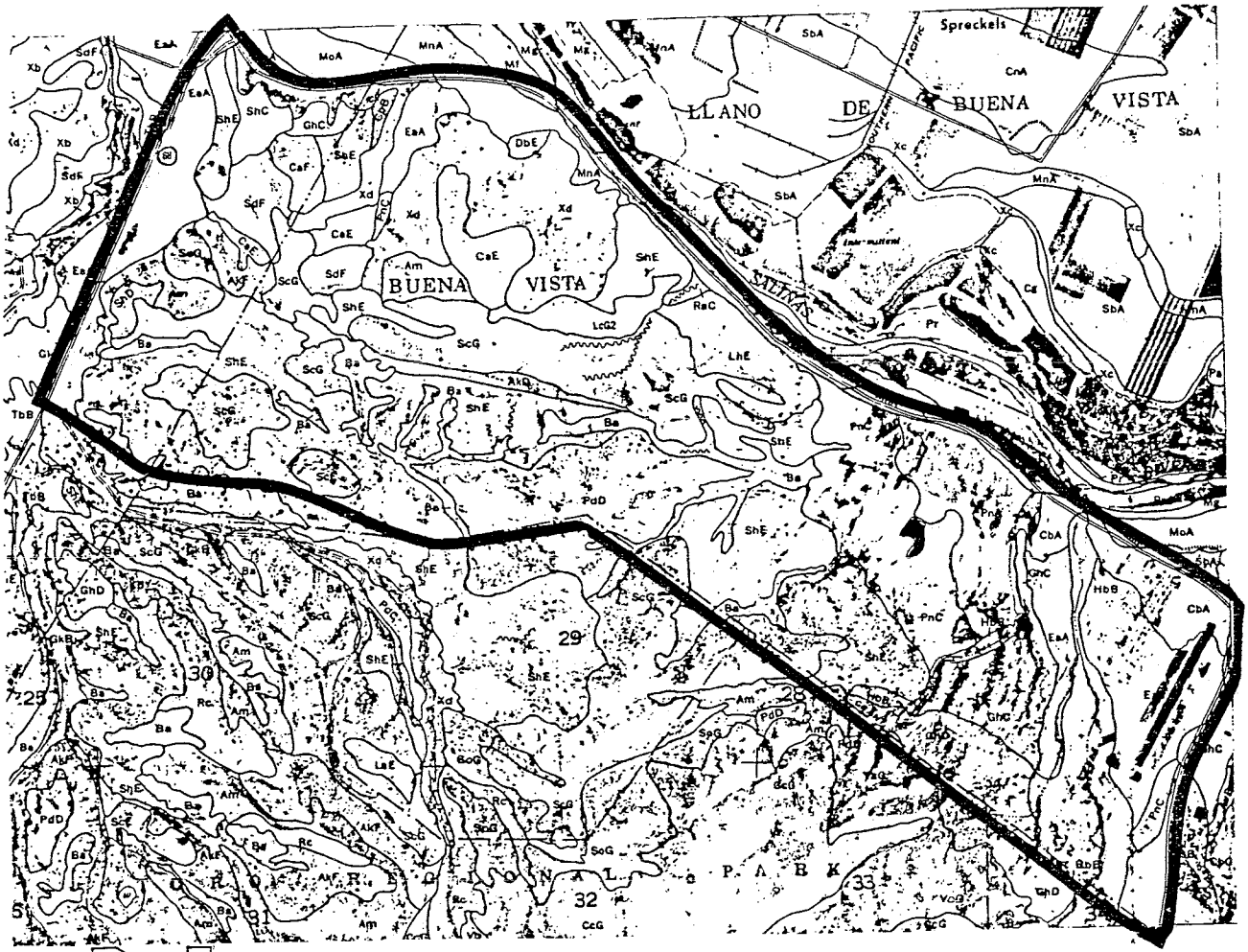
Soils of the River Road ADC are shown on Exhibit 2.4. In addition to the soils shown in Table 2.2 (Las Palmas Ranch), Table 2.4 lists other soils found in the River Road ADC.

TABLE 2.4

ADDITIONAL SOILS OF THE RIVER ROAD ADC

SYMBOL	SOIL TYPE	SLOPE	RUNOFF	EROSION HAZARD	AGRICULTURAL CAPABILITY
AkF	Arnold Loam Sand	15-50	Rapid	High	VIIe-1
GkB	Gloria Sandy Loam	2- 9	Slow	Slight	IIIe-3
ShC	Santa Ynez Fine Sandy Loam	2- 9	Slow	Medium	IVe-3
AsB	Arroyo Seco Gravelly Sandy Loam	2- 5	Slow	Slight	IIIe-4
PnC	Placentia Sandy Loam	2- 9	Slow	Slight	IVe-3
HbB	Hanford Gravelly Sandy Loam	0- 5	Slow	Slight	IIs-4
ShD	Santa Ynez Fine Sandy Loam	9-15	Medium	Moderate	IVe-3

Source: United States Department of Agriculture, Soil Survey of Monterey County, 1978.



THE A.D.C. SOILS MAP

SOILS TYPE

- A..C ALTO SILTY CLAY
- A.. ARNOLD LOAMY SAND
- A.. ARNOLD - SAN ANDREAS COMPLEX
- B.. BADLAND
- C..E CHAMISE SHALY LOAM
- C.F CHAMISE SHALY LOAM
- C B CHUALAR LOAM
- D.E DIABLO CLAY
- E.A ELDER SANDY LOAM
- G.C GLORIA SANDY LOAM
- L G. LINNE-SHEDD SILTY CLAY LOAM
- L E LOPEZ SHALY LOAM
- M A MOCHO SILTY LOAM
- P A PLACENTIA SANDY LOAM
- P C PLACENTIA SANDY LOAM
- S E SAN ANDREAS FINE SANDY LOAM
- S G SAN ANDREAS FINE SANDY LOAM
- S.F SAN BENITO CLAY LOAM
- S.E SANTA YNEZ FINE SANDY LOAM
- X.. XERORTHENTS - DISSECTED
- P.D PFEIFER FINE SANDY LOAM

LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

GRUNWALD CRAWFORD ASSOCIATES

Soils of Toro Vista are generally moderate to steeply sloping with rapid runoff and high erosion hazard; an exception is the band of Elder Sandy Loam adjacent to Highway 68. In the eastern portion of the ADC, lands adjacent to River Road are gently sloping with good agricultural capability. Towards the southern boundary, slopes are moderate to steep, characterized by rough terrain.

IMPACTS

Las Palmas Ranch

Both alternative plans for Las Palmas Ranch would remove existing cultivated farmland south of River Road, thus converting about 33 acres of prime lands to urban uses. Existing cultivated lands north of River Road would also be lost to row crop production in both plans (see 2.9.1 - Wastewater Management). Loss of these prime farmlands may not be inconsistent with existing policy as discussed in Section 1.3.1.. However, if the loss of this row crop farmland serves as a precedent for the conversion of other high value crop farmland, the cumulative impact would be significant. The loss of the 33 acres would be irreversible with either plan, however, and replacement of the farmland elsewhere on the ranch site would be difficult.

Cooper and Clark determined that soils associated with Santa Margarita Sandstone, Paso Robles tertiary formation and terrace deposits, and alluvium and colluvium of the Quarternary may provide less than adequate support for structural foundations.(1)

The Soils Map shows areas identified by Cooper and Clark that have experienced sliding, slumping, failure and soil creep. These areas, if disturbed, will likely accelerate soil loss and increase the potential failure of sensitive formations.

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(1) Cooper & Clark, "Final Report Phase I, Geological Reconnaissance and Geologic Hazards Investigtion - Las Palmas Ranch".

Natural seeps found within the site occur along contacts of soil types and near documented ground failure. Construction activity for roads, sewer and water lines and building pads affecting the toe of existing slips and disturbances to natural seep areas are likely to increase the probability of creep and subsequent failure.

A conversion to urban use will affect sheet erosion soil loss and associated runoff and drainage will affect rill and gully erosion. The magnitude of potential impacts is directly related to the actual soil type disturbed and, more importantly, to applied conservation practices. Without conservation practices, long term agricultural operations have a greater potential for sheet and rill erosion and related water quality degradation than soil loss from a mature residential development. Conversely, a greater potential for initial large volume sheet and rill erosion exists during the first two years following construction activity than from normal agricultural practices.

The ADC Policy Plan for the Ranch has the potential to create more erosion than the Existing Policy Plan by virtue of more extensive site development and more intensive use of areas identified by the soil capability analysis as sensitive to higher densities.

Both alternative specific plans propose development in areas where portions have been identified by the soil capability analysis for no development or very low intensity development. However, as stated in the Existing Policy Plan report, the intent is to resolve the use of these sensitive areas during the precise design stage by including them in the open space or by providing specific engineering solutions approved by the county.

Of particular concern with the ADC Policy Plan are development areas C, F, G, H, I, J, and K. Areas F, J, and K occur partially on soils identified as Class I

from a soil suitability standpoint and are recommended for non-residential use by the soil capability analysis. The other four development areas (C, G, H and I) are proposed for more intense use than indicated by the soil capability analysis.

Significant adverse impact could occur from development in these areas on either plan alternative if the precise design stage ignores the limitations.

Intensive development in Development Area A, north of the Corey House, could be impacted by landslide areas as identified on the soil map. An area of soil creep, identified in Area H near the southern site boundary, could adversely affect building foundations and swimming pools.

In summary, the potential for soil disruption and erosion is relatively less with the Existing Policy Plan than with the ADC Policy Plan. Although caution must be exercised in the northerly Development Areas of either Plan as highlighted above, the Existing Policy Plan is less intense (fewer units per acre) and does not involve Area K as a development area. The potential hazards posed by landslide and soil creep areas are virtually the same for both proposed plans.

River Road ADC (Excluding Las Palmas Ranch)

Existing cultivated land within the River Road ADC, exclusive of Las Palmas Ranch, is proposed to remain in permanent agriculture. These lands, located at River Road and Pine Canyon Road, will continue to contribute sedimentation to the Salinas River as a result of agricultural practices. The Pedrazzi and Indian Springs subdivisions are relatively stable and will not contribute significantly to soil impacts.

Although Toro Vista, Vista Del Rio and Pine Canyon Estates are undeveloped, the

Final EIR's for those projects contain mitigation measures which, when instituted, should minimize soil impacts.

Parcels "A" and "B" in Exhibit 1.2, totaling about 177 acres, currently have no development plans. Parcel "A" contains moderate to steep slopes and primarily Santa Ynez fine sandy loams; this soil type has a high erosion hazard and is generally not suited to residental development. Parcel "B" is more moderately sloping with sandy loams less prone to erosion and better suited to development.

Within the River Road ADC (excluding Las Palmas Ranch), development entitlements and existing county procedures can be applied to development projects to reduce soil impacts. Thus, the most adverse cumulative effects in the development of the ADC (excluding Las Palmas Ranch) will come from the approximate 284 acres which will either remain in permanent agriculture or, in the case of Parcels "A" and "B", will probably be developed through the parcel map process.

MITIGATION MEASURES

Las Palmas Ranch

The following measures apply to both proposed plans for Las Palmas Ranch:

1. The avoidance of sensitive soils, as recommended by the soil capability analysis, is the primary mitigation measure. This could entail some revision to both plans during the precise design stage. Relatively more revision may be required of the ADC Policy Plan since it shows more development planned for unsuitable areas.

2. An on-site grading and erosion control plan should be prepared prior to tentative map approval. By means of this program, erosion, siltation, and sedimentation controls can be implemented in accordance with the Monterey County Master Drainage Plan. The plan would contain best management practices as appropriate, which should include the following

as a minimum:

- Winterization practices.
- Permanent structural and vegetative stabilization practices.
- Location, size and construction specifications of appropriate storm water/sediment catch basins.
- Identification of building envelopes and driveway access in areas over 15% slope for purposes of slope stability analysis.

3. Between 876 acres (Existing Policy Plan) and 900 acres (ADC Policy Plan) of the site will be maintained in permanent open space. The soils of the area to be left open are primarily suited to rangeland, watershed, and wildlife. A resource management plan should be submitted for the open space area containing provisions for wildlife habitat enhancement and recreation use.

The River Road ADC (Excluding Las Palmas Ranch)

1. Owners of permanent agricultural lands should be encouraged to implement Best Management Practices suggested by the U.S. Soil Conservation Service.

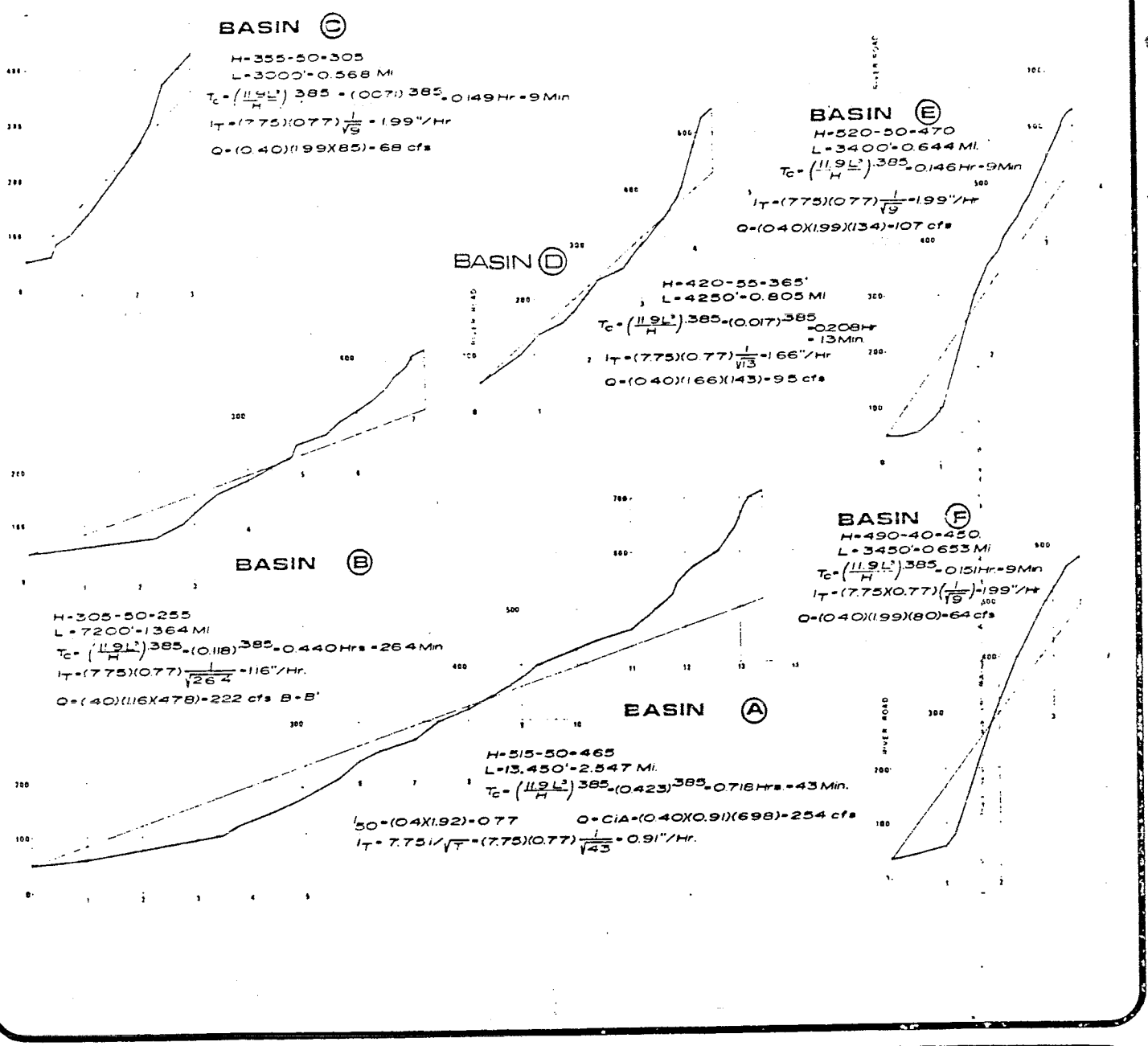
2. Future development of Parcels "A" and "B" (Exhibit 2.5), should be implemented with final subdivision map standards so that adequate erosion control measures can be identified and precisely sited.

3. See Final EIR's for Toro Vista, Vista Del Rio and Pine Canyon Estates, which are incorporated here by reference. (See Bibliography)

2.4 HYDROLOGY

SETTING

The Las Palmas Ranch Environmental Resources Inventory provides an extensive discussion of local hydrological data and should be consulted for further information.



BASIN
PROFILES
HYDROLOGY

LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

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2.4.1 Surface Hydrology

Las Palmas Ranch

The Las Palmas property is drained by a series of intermittent creeks which form seven basic drainage basins flowing northerly to the Salinas River (Exhibit 2.6). These relatively small drainage areas generally originate within the property boundaries. The largest drainage area (700 acres ±) originates slightly south of the property. Existing drainage control structures constructed along the northeasterly property line and River Road consist of 24-36" diameter corrugated metal pipe culverts under the road bed. The runoff drains onto adjacent farmland and into the Salinas River.

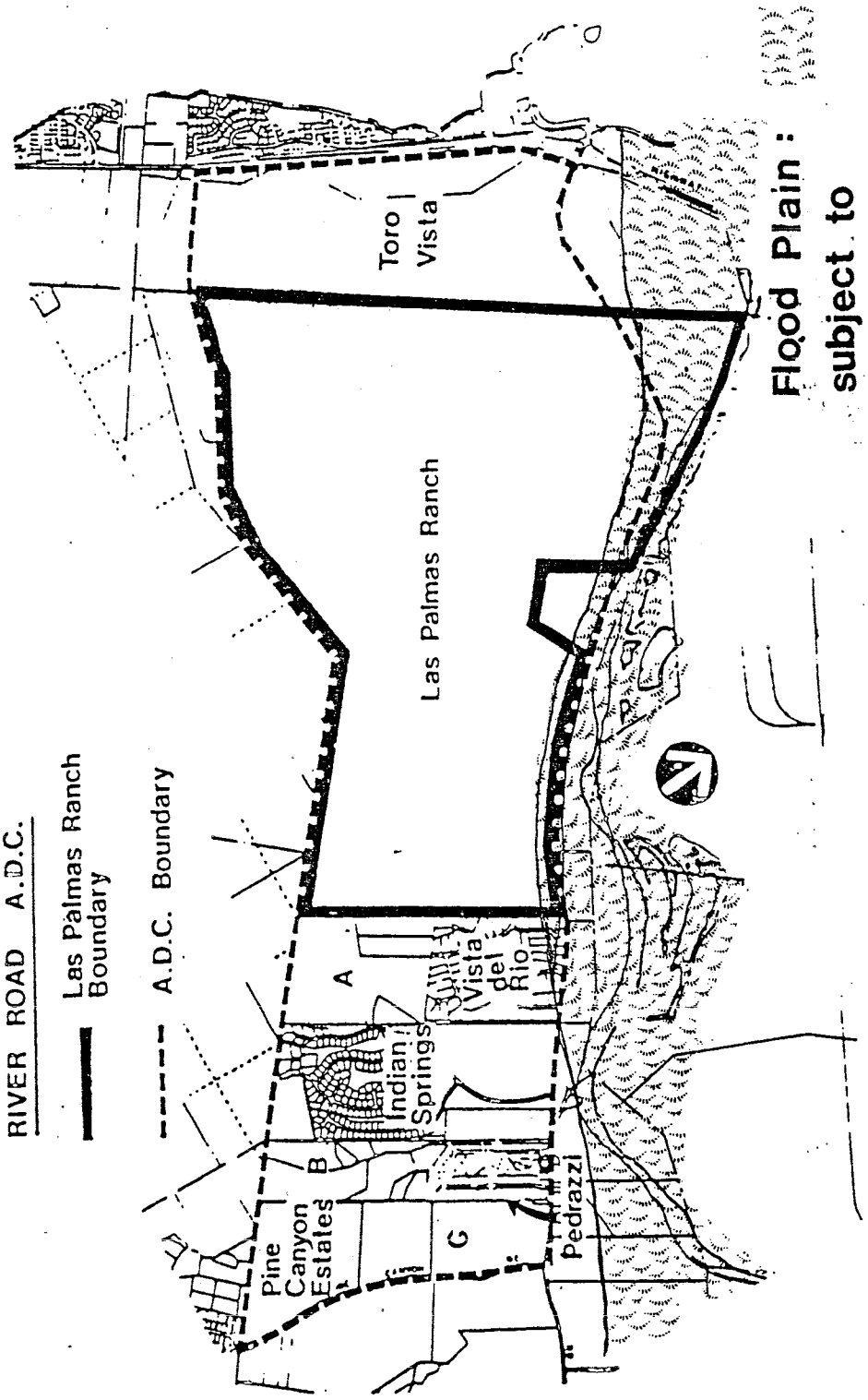
Profiles of each of the basins are shown in Exhibit 2.5 together with calculations based on the Monterey County Department of Public Works Standard Details, Plate No. 25. This supplied the 50-year storm intensities to be expected. Times of concentration (Tc) were obtained by use of basin profiles shown. No initial time was added, thus results should be conservative. An overall runoff coefficient based on the average for the entire site was used for these calculations (C-0.40). The "rational formula" was then used to obtain the results shown.

The Monterey County Flood Control District is currently involved in flood plain mapping of the Salinas River. Their consultant for this portion of the overall project is George S. Nolte & Associates of San Jose. Preliminary results of the flood plain mapping project indicate that the existing 100 year flood plain encompasses the northwest portion of the site, including a small area south of River Road (Exhibit 2.6).

The flood mapping at this point, however, must be considered tentative for the following reasons:

100 YEAR FLOOD PLAIN

EXHIBIT 2.6



LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

GRUNWALD CRAWFORD ASSOCIATES

a. The studies of the flood plain consultant were based on U.S.G.S. maps supplemented by cross sections done by photogrammetric methods. According to the Las Palmas project engineer, specific mapping of Las Palmas and a re-study of the portion of the river adjacent to the property will provide greater accuracy.

b. The flood plain consultant's map indicates that an existing levee along the south bank of the river at the northwestern corner of Las Palmas is not permanent. Levees adjacent to the north bank of the river, are treated as permanent features. Equal treatment of all levees in the calculations could also lead to more accurate results.

River Road ADC (Excluding Las Palmas Ranch)

With the exception of Toro Vista, the remainder of the River Road ADC drains within small intermittent channels directly to the Salinas River.

Toro Vista drains to El Toro Creek west of Highway 68 (El Toro Creek drains an approximate 42 square mile area). These channels are also intermittent, carrying runoff flows under Highway 68 in a system of pipes and reinforced culverts.

None of the Toro Vista area within the River Road ADC is subject to 100 year flooding. Approximately 22 acres of the Vista Del Rio subdivision is within the 100 year flood plain of the Salinas River, as identified within the Final EIR for that project.

IMPACTS

Las Palmas Ranch

Concentrated development and impervious surfaces proposed in both alternative plans will increase runoff above those identified for existing drainage basins.

Increases in peak flows could cause on-site flooding, especially at the point of discharge on River Road, and greater erosion hazard.

The medium density housing in Area A of both Plan alternatives south of River Road could be impacted by a 100 year flood.

The River Road ADC (Excluding the Las Palmas Ranch)

With mitigation measures applied as outlined in the Final EIR's for Toro Vista, Pine Canyon Estates and Vista Del Rio, drainage impacts are not expected to be significant.

MITIGATION MEASURES

Las Palmas Ranch

The following are applicable to either of the alternative plans for the Las Palmas Ranch:

1. The Erosion and Drainage Control Plan to be implemented as development proceeds, can maintain runoff at or below current levels.

2. In keeping with the Monterey County Safety Element, uses allowed within the 100 year flood plain should be constructed to be flood-safe, and located and constructed to avoid the possibility of increasing flood levels elsewhere.

3. To protect urban development south of River Road, the endangered area should be filled to an elevation above the indicated flood elevation.

4. The portion of River Road subject to flooding should be raised to act as levee against the 100 year flood.

5. Culverts passing under River Road should be equipped with flood gates to prevent flood waters from backing through them into the project.

2.4.2 Groundwater

(See 2.9.2. - Water Service for on-site facility requirements.)

With the exception of Toro Vista, the entire River Road ADC is within the Salinas basin and within Zone 2 or 2A of the Monterey County Flood Control and Water Conservation District (MCFCD). Groundwater yields have been good in the general area, but due to variations in strata, drilling and testing would be needed to find the best well sites.

With few exceptions, according to the State Water Resources Control Board(1), the surface water and groundwater quality in the Salinas River Sub Basin is suitable for all water uses. Agricultural wastewater contributes to the impairment of groundwater quality to varying degrees throughout the sub basin, as does saltwater intrusion in the Castroville area.

IMPACTS

The ADC Policy Plan domestic requirement will be about 922 acre feet annually compared to 450 acre feet for the Existing Policy Plan. The estimated annual domestic water requirement for the remainder of the River Road ADC is 500 acre feet. In addition, row crop lands, if remaining in production, would continue to require about 400 acre feet per year.

In a special hearing before the Monterey County Board of Supervisors held June 23, 1981, Mr. Robert Smith, District Manager of the MCFCD, stated that water of adequate quantity and quality exists to serve proposed development in the Toro Area, which includes the River Road ADC. Smith stated further that the proposed levels of development in the River Road ADC do not pose any threat of degradation to the groundwater of the area. Therefore, no significant drawdown of the underground water supply is anticipated based on studies by the MCFCD.

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(1) State of California, Water Resources Control Board, (Interim) Water Quality Control Plan for the Central Coastal Basin (Basin 3); June, 1971.

MITIGATION MEASURES

1. A program of well exploration, volume, and quality testing by a registered hydrologist should be carried out prior to tentative map approval.

2. Engineered treatment for removal of sand, iron, manganese as well as a chlorinator for possible coliform bacteria will mitigate water quality problems.

2.5 VEGETATION AND WILDLIFE

This section is a summary of the flora, fauna and habitat types found on the subject property. A more complete biological survey report is included in The Las Palmas Ranch Environmental Resources Inventory.

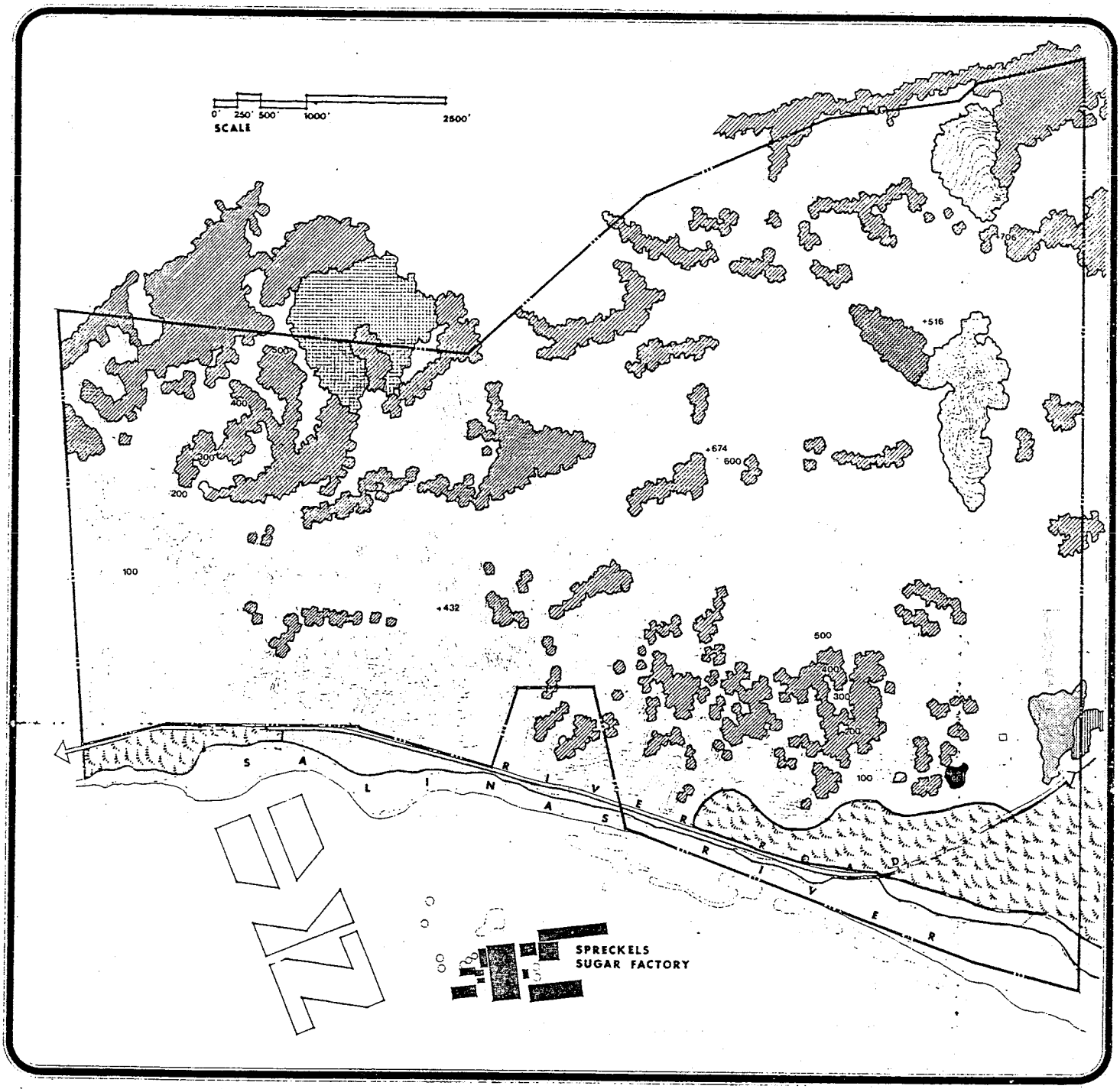
2.5.1 Vegetation

SETTING

Las Palmas Ranch

The exposure and rain shadow effect created by the Santa Lucia Mountains and Mt. Toro, further to the south and west, results in sparse vegetation by comparison to other properties nearby. Exhibit 2.7 shows that over half of the property is open grassland which is grazed by cattle; most of the remainder is scattered oak woodland with an understory of grass. Biologically, there is little distinction between the grassland and oak woodland except for the influence of individual trees.

Minor portions of the property which contain steep slopes and ravines are covered with brush, predominately chamise and California sagebrush. The dominant native trees on the property are coast live oak. Also present are a few California buckeye and occasional toyons approaching tree size. North of River



VEGETATION

LEGEND

- OAK WOODLANDS
- OAK & SAGEBRUSH
- CALIFORNIA SAGEBRUSH
- CHEMISE
- OPEN GRASSLANDS
- PINE & CYPRESS
- EUCALYPTUS
- POSSIBLE HABITAT OF ENDANGERED PLANT SPECIES
- RIPARIAN
- AGRICULTURAL

LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

GRUNWALD CRAWFORD ASSOCIATES

Road, the land is farmed except for a band of riparian vegetation along the Salinas River.

The oak woodland consists mainly of widely dispersed trees, probably in the 200 to 300 year age class. Some are stately, spreading trees, many others are in poor condition and appear to be declining from heart rot and the effects of the 1976-1977 drought. Several trees with the original trunks burned or rotted away have resprouted from the roots and form clumps of smaller trees. There are few young oaks, saplings, or seedlings primarily because cattle grazing has suppressed oak regeneration. Existing oaks which provide visual relief to otherwise barren terrain, could be considered the area's most valuable biological resource.

Brushland - Two distinctly different types of brushlands, which do not overlap, occur on the Las Palmas Ranch. Along the southern property line, about a third of the distance from the southeastern corner of the property, is a slope covered with a pure stand of chamise. Near the western edge of the property, in a ravine behind the main ranch house, is a brush type consisting almost entirely of California sagebrush.

Grasslands - Grasslands comprise the most extensive vegetation type. They cover large open knolls and meadows and merge with the open oak woodland where the understory composition is virtually the same. These grasslands, often defined as native pasture, are not native in a biological sense. Continued cattle grazing has had a profound effect on the native plant communities originally adapted to the site. Native bunch grasses, which probably originally consisted of purple needlegrass, have long since been replaced with European annual grasses, such as wild oats, foxtail, ripgut and soft chess. In addition, there are a number of other weeds and forbes introduced from foreign countries. These

exotics dominate the ground cover. Most of the pasture land has been considerably altered from a purely natural state. Besides supporting introduced plants, the slopes are compacted and contoured with numerous cattle trails.

Native annual and perennial herbaceous plants are still represented in most grasslands of this type. However, their distribution and abundance are significantly affected by cattle grazing and by competition from introduced plants.

Riparian - The riparian belt along the Salinas River differs distinctly from the vegetation found on the rest of the Las Palmas property. It is buffered by a zone of agricultural land which separates it from the balance of the land.

The only endangered plant species expected to exist on the property is Delphinium hutchinsonae, which inhabit the steep slope at the extreme west boundary above River Road among the oaks and buckeye. None could be observed or identified when the field survey was conducted.

The River Road ADC (Excluding Las Palmas Ranch)

The undeveloped portions of the River Road ADC remain in open grassland with scattered stands of oak and brush. The approximate 77 acre Parcel "C" at Pine Canyon Road is planted to row crops. For the developed portions, vegetation has largely been removed and urban landscaping substituted.

IMPACTS

Las Palmas Ranch

Either plan alternative for Las Palmas will minimally impact vegetation. The greatest impacts would be the possible removal of mature oaks during construction and the danger of wildfire brought about by human activity in chaparral and grassland areas. Specimen trees could be damaged if development occurs too close to their root structures. It can also be expected that introduced flora

will flourish at the expense of some highly adapted natural types. Some oaks, for example, do not tolerate summer wetness around root areas.

In addition, changes in livestock grazing may create impacts. If livestock are permanently removed, an increase in chaparral and oak woodland could be expected since seedlings would not be grazed. As this vegetation grows, there will be less water in intermittent stream channels because immediate subsurface percolation will be taken by growing plants resulting in evapotranspiration.

The River Road ADC (Excluding Las Palmas Ranch)

Other than impacts identified above, no significant effects are expected as a result of development within the River Road ADC.

MITIGATION MEASURES

1. New development within the River Road ADC should include a tree preservation policy with criteria established for identifying specimen trees.

2. Areas of important vegetation or wildlife habitat should be preserved. This may require a program of controlled burn and/or continued mmanaged grazing to maintain the balanced ecology of open space areas.

2.5.2 Wildlife

SETTING

Las Palmas Ranch

Mammals and birds on the Las Palmas property are species adapted to open grassland and terrain and grazing pressure or, they are transients spending only a part of their time on the property. Various species of birds may use the oaks for nesting sites during the spring and as feeding grounds the remainder of the year. Migratory species would be present only temporarily. Permanent residents include smaller mammals such as rodents and reptiles. No probable habitat for amphibians is apparent except within and near the Salinas River riparian zone,

and possibly by a spring in the ravine behind the house. Habitat appears ideal for seed-eating birds such as doves and quail; woodpeckers may also be evident due to the number of dead or old oaks.

No population of endangered mammal, bird, reptile or amphibians are expected nor were any discovered in the field surveys conducted for The Las Palmas Ranch Environmental Resources Inventory.

The River Road ADC (Excluding Las Palmas Ranch)

Animal habitats are similar to Las Palmas in the undeveloped portions of the River Road ADC. No migratory routes are known to exist across River Road ADC properties from the uplands to the Salinas River.

Within developed areas, including land in agricultural production, major wildlife habitat has been removed and species are limited to birds and burrowing animals with occasional visits by permanent wildlife species from nearby open lands.

IMPACTS

Either alternative plan for Las Palmas will maintain substantial area in open space, including the site's most important habitat areas. With any development in the River Road ADC, however, the range of wildlife will be narrowed. Most affected will be species which do not adjust well to urban development. These include hawks, foxes, deer, skunks, and coyotes. Animals that do not adjust well, or whose habitat is removed, will relocate to open lands to the south and east; this type of relocation usually creates an ecological imbalance in habitat on those properties and result in a reduction in wildlife numbers over time.

Human developments bring pets. Two major impacts are the destruction of wildlife by ferral animals and the possibility of rabies contraction. Monterey

County is a rabies endemic area and domestic animals and people suffer illness and occasional death from rabies annually.

MITIGATION MEASURES

1. New development in the River Road ADC should maintain important habitat areas in permanent open space. The large portions of Las Palmas Ranch and Toro Vista which are proposed as open space will ensure that many wildlife species will remain on the properties. Open space areas should include grassland, woodland, chaparrel, and riparian habitat.

2. Control of domestic pets should be encouraged in all new developments through a public education program conducted through a Homeowner's Association. All pets likely to come into contact with wild animals should be vaccinated for rabies.

3. The proposed management program for the open space should express the goals and then the activities and responsibilities needed to achieve those goals. The plan for management of open space and improvement of habitat values should begin concurrently with the first implementation phase. This program should be approved by the County of Monterey after approval by experts in the field of rangeland ecology.

2.6 AESTHETICS

2.6.1 VISUAL SETTING/IMPACTS

Las Palmas Ranch

1. The view from Salinas Valley to the lower levels of the site is dominated by the Spreckels Sugar Plant with a sweeping panorama of gentle rolling hills and woodlands beyond. Development of either alternative plan would have little effect on the view. Lower reaches of the site, where higher densities are proposed, are not visible from the valley.

Both alternative plans protect the view of the ridge lines as seen from the valley by not proposing development on the north side of these ridges. A possible area of concern is the southeast portion of the site which is a gently sloping area rising about 200 feet in elevation above River Road. This area is proposed for lower density, single-family development on both alternative plans. Units could be visible from the valley especially at night depending on light controls and during the day depending upon roof materials.

2. The site is blessed with on-site views of the Salinas Valley, the Gabilan Mountains to the east as well as local ridgelines. Development, especially at clustered densities as high as those proposed, has the potential to disrupt the scenic quality of the site and to create structural elements not in harmony with the natural surroundings.

3. Highway 68 is a designated scenic highway from Route 1, in Monterey, to the Salinas River. Very little of the property is visible from the designated scenic portion of the highway, especially west of the River Road interchange. The Corey House can be partially seen from the Salinas River Bridge and it can be expected that residential units surrounding the home would also be partially visible to the highway traveler. Given the distance from the highway (3/4 of a mile) and the level of development envisioned by the adjacent Toro Vista development, visual impacts on scenic Highway 68 are insignificant.

4. Views from River Road can be expected to change from the existing open land/agriculture to a more urban setting softened by landscaping, entry way treatment, and architectural control. While the project can be screened from view from the Salinas area by natural landscape features

and ridgelines, total screening is not possible from the River Road traveler. Apartment/condominium and commercial development will be visible from the roadway corridor, especially in the short term until buffer landscaping matures. Much of the scenic open quality of River Road corridor will be altered with development.

The River Road ADC

The potential visual impacts of development of the Pine Canyon Estates, Vista Del Rio subdivisions, and the Toro Vista area were discussed at length in the EIR's prepared for these projects. Areas "A" and "B", the only other portions of the River Road ADC subject to development, are hillside sites which could significantly impact the visual quality of the view from River Road.

MITIGATION MEASURES

1. Both alternative plans propose to provide architectural and landscaping controls (including lighting), to provide a project in harmony with the natural environment. These measures should include tree preservation; the use of natural colors and compatible building materials, and the establishment of a Design Control/Design Reviewer Committee which would be empowered by the by-laws of the Homeowners Association. Locational criteria outlined in each plan and the above measures should reduce on-site visual impacts.

2. The following measures, taken from the Monterey County Scenic Highway Element, should be applied to the River Road Corridor.

   a. All new utilities should be placed underground.

   b. Restrict outdoor advertising.

   c. The minimum 50 foot buffer adjacent to River Road on the south should contain natural area native plants where possible; insure that a maintenance entity exists for long-term landscaping needs through a Homeowners' Association.

   d. Directional signs should be small and unobtrusive.

e. Guard rails and fences should blend with the landscape, and low intensity colors such as greys and browns should prevail.

f. Where possible, frontage roads should not parallel River Road.

3. The following standards should be applied to all new development in the River Road ADC:

a. Houses on exposed valley sideslopes or plateau edges shall be screened by planting informal tree masses of native species.

b. No development will be allowed on prominent ridgetops.

c. Residential units located adjacent to county roadways and along the edge of upper terraces shall be limited to the height equivalent of a one-story structure.

d. Preservation of natural features (such as significant tree groves or individual trees) shall be maximized.

e. Roadway alignment shall follow and blend with the topography and shall not exceed 15 percent grade.

f. A variety of native species should be planted in informal masses at frequent intervals along the streets and within private and public spaces within the residential complexes.

g. All cut and fill embankments shall be replanted with native trees and groundcovers similar to existing vegetation in the immediate area.

h. Street lighting should minimize glare or should not exist at all, in order to preserve the rural/residential character of the area.

4. Hilltop development in Areas J and K of the ADC Policy Plan should be added to open space if design review shows that they would create an unacceptable visual impact.

2.6.2 Noise

SETTING

The primary noise sources in the Las Palmas Ranch vicinity are the operation of farm equipment and the traffic on River Road. The impact on residents is considered minimal as the area is sparsely populated and the traffic is light.

For properties east of Las Palmas Ranch, the existing noise environment is typi-

cal of a rural area. For Toro Vista, noise is primarily generated by traffic on Highway 68. Noise measurements projected by CalTrans in 1979 indicate that unshielded areas within 134 feet of the Highway would be subject to noise levels 65 L_{dn} or greater. Noise levels of 60 L_{dn} or greater would occur within 288 feet of the roadway. (L_{dn} is a measurement of the total noise environment for an entire day, with a weighting factor added to noise occurring between 10:00 p.m. and 7:00 a.m.)

There are a number of different standards used for evaluating the effect of noise upon residents. State standards recommend a maximum of 60 CNEL for outdoor and 45 CNEL for interior noise exposures. Maintaining interior noise levels at 45 CNEL is considered the more critical of the two noise conditions (interior and exterior). For planning purposes, CNEL and L_{dn} are considered equivalent. The Monterey County Housing Element recommends an outdoor level of 55 L_{dn}.

Generally, conventional construction provides sufficient insulation to effect a 15-20 decibel reduction between outdoor and indoor noise levels. Thus, in an area exposed to 65 CNEL, although the recommended standard for outdoor noise levels (60 CNEL) would be exceeded, indoor levels would still be acceptable (45 CNEL). However, in areas where outdoor noise exceeds 65 CNEL, additional noise attenuation measures would be necessary to insure acceptable interior noise levels.

IMPACT

Ambient noise levels within developed areas will rise to levels typical of an urban setting; these noises are generally accepted by residents as part of the normal living environment.

Short-term noise impacts would occur as a result of on-site construction

activities. The intensity of noise would decrease with distance such that impacts on nearby residential areas would not be significant.

Once construction is complete, the major noise source will be auto traffic on River Road. For purposes of the EIR, the ADC Policy Plan is analyzed as a worst case. The 1995 traffic projection for River Road is 18,000 vehicles per day past the site. In an urban setting, a 2-4 lane roadway with similar traffic would be expected to generate noise levels of approximately 65 CNEL at the roadway's edge.(1) For an unobstructed site (without swales or other landforms) the 65 CNEL contour would extend 50 feet into the site. Noise levels of 60 CNEL or greater could be expected within 100 feet of the roadway; the 55 CNEL contour would extend an estimated 200 feet into an unobstructed site.(2)

This indicates that living units constructed closer than 135 feet of River Road would not meet state recommended outdoor levels. Because dwelling units themselves, once in place, act as noise buffers, concern must be for initial building setbacks and attenuation measures for those units closest to the roadway.

Both plan alternatives propose a 50 foot landscaped setback adjacent to River Road. If implemented, this measure should insure that no units are constructed within the 65 CNEL area. As a result, indoor levels of 45 CNEL should be maintained with normal construction techniques.

Noise levels are not expected to be significant adjacent to River Road east of Las Palmas in that 98% of Las Palmas traffic would be westbound for Highway 68. Parcels "A" and "B" in Exhibit 1.2 are also more than 2000 feet from the roadway, a factor which further mitigates potential noise impacts.

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(1) Bolt, Beranck and Newman, "Fundamentals and Abatement of Highway Traffic Noise", NITS, 1973.

(2) Ibid.

When the Toro Vista portion of the River Road ADC is fully developed, the projected 65 CNEL contour parallel to Highway 68 will extend 273 feet into the property, the 60 CNEL contour will extend 566 feet and the 55 CNEL contour will extend 900 to 1000 feet.

MITIGATION MEASURES

Improved automobile technology and noise standards of the California Vehicle Code will reduce future vehicle noise levels. These factors, combined with the widening and resurfacing of major roadways and other traffic flow improvements will further reduce vehicle noise.

1. The recommendations of both the Existing Policy Plan and the ADC Policy Plan for a 50 foot landscaped setback adjacent to River Road will assure an acceptable indoor noise level for even the closest units to the roadway.

2. Within 100 feet from River Road, outdoor noise levels will exceed 60 CNEL. Potential adverse effects can be mitigated by requiring a minimum building setback corresponding to the 60 CNEL contour. An alternative would be an informal meandering system of earth berms within the 50 foot setback area.

   The geometry of the earth berm determines its effectiveness as a noise barrier. They must be constructed so as to block the line of sight between the noise source and the noise receiver. A properly designed berm could achieve a 10dB reduction.

3. Noise attenuation measures should be provided for all structures located within the 65 CNEL noise contour.

4. An acoustical engineer should be retained by the Toro Vista developers to determine the type and specifications of appropriate sound reduction

barriers to achieve an indoor level of 45 CNEL. Consideration should be given to the aesthetic character of any proposed noise barriers to ensure preservation of the scenic quality of Highway 68.

5. The recommendations in the Toro Vista Specific Plan for providing visual and noise buffers in Development Units B and E should be implemented. The measures include earthen berms, extensive landscaping, and a 100 foot building setback from the Highway 68 right-of-way.

2.7 TRAFFIC

SETTING

In January, 1981, Wilsey and Ham of Foster City, California prepared a traffic study for Las Palmas which is incorporated here by reference and is on file with the County Planning Department. The Final EIR for the Toro Vista Specific Plan provides supplemental information. The existing traffic setting is summarized as follows:

Regional access to the River Road ADC and Las Palmas Ranch is provided by State Highway 68, which connects with U.S. Highway 101 to the east and State Route 1 to the west and is a state designated scenic highway. Highway 68 is a four-lane facility between River Road and Blanco Road to the east. East of Blanco Road, Highway 68 becomes South Main Street, a four-lane arterial roadway. West of the River Road interchange, past Toro Vista, the highway narrows to a two-lane facility with direct access from abutting streets.

Local access is provided by River Road, a two-lane roadway that follows the northern boundary of the River Road ADC. The paved width of River Road varies between 36 and 40 feet, with unpaved shoulders in some areas.

A traffic count program was conducted to determine daily and peak-hour volumes, directional patterns of traffic flow, and to obtain trip generation factors for existing developments. Both automatic traffic counters and manual counts were taken in the project vicinity. The results of this count program are shown in Exhibit 2.8.

Daily and peak-hour traffic volumes in the vicinity of Las Palmas Ranch were obtained by Wilsey & Ham and Caltrans during October and November, 1980. As would be expected, the heaviest volumes occur along Highway 68, north of River Road, where daily traffic reaches 22,000 vehicles. This is well below the capacity of a four-lane freeway, which is approximately 60,000 vehicles per day (vpd).

Current traffic levels on the two lane portion of Highway 68 past Toro Vista, however, exceed what is considered by the Monterey County Department of Public Works as a generally acceptable capacity for a two-lane highway: 9000 vehicles per day or 900 vehicles per hour for service level "C" operation.(1) Traffic counts provided by CalTrans indicate the following volume increased over the past four years along Highway 68 between River Road and San Benancio Road.

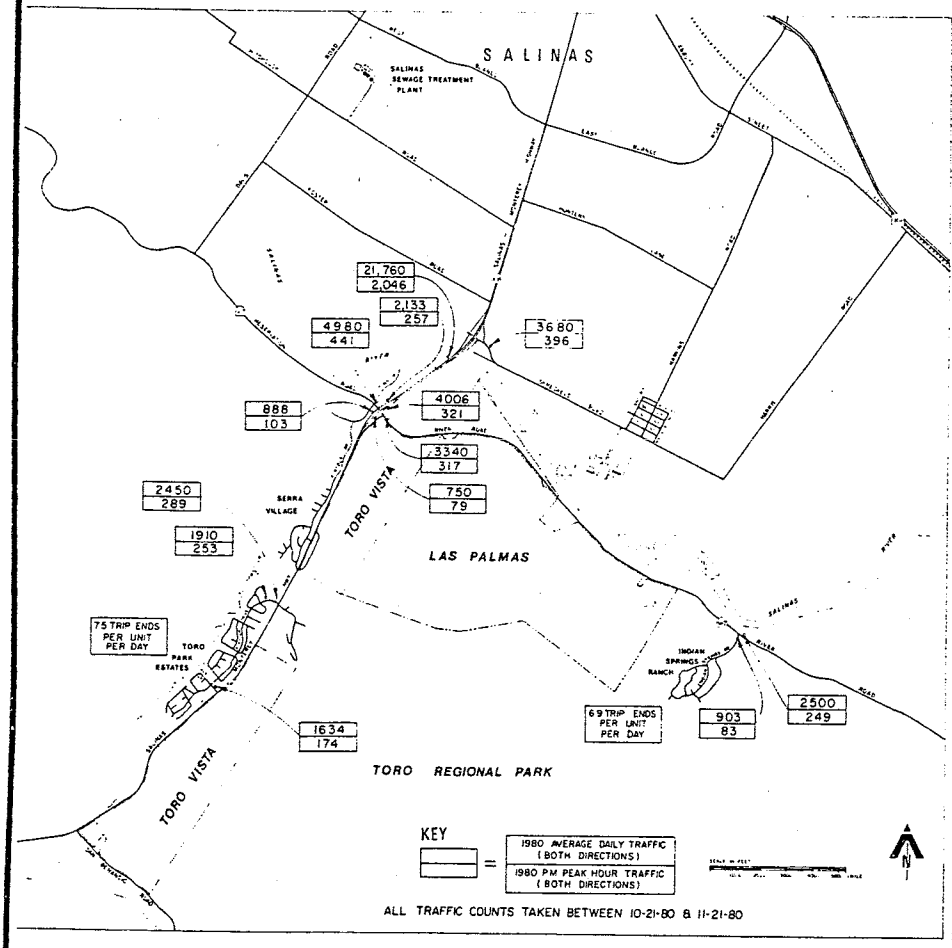
Highway 68 Volumes

between River Road and San Benancio Road

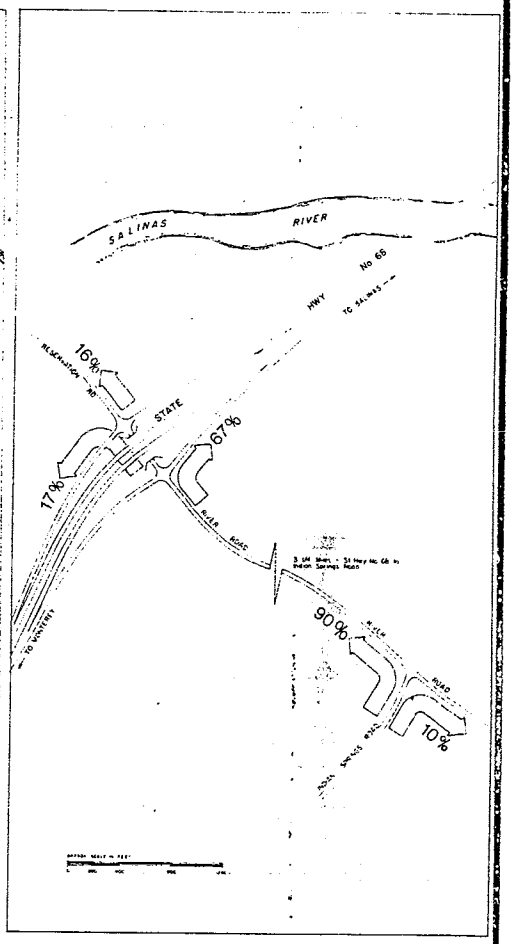
1976	1979	1980
14,700	16,900	17,100

Forecasts in the Monterey County Transportation Plan indicate that major improvements to Highway 68 will be needed. The recommended capital program

(1) Service level "C" provides stable flow, at relatively high speeds, but may restrict some drivers' freedom to select their own speed. It is the desirable level to be obtained and maintained as outlineed in the Goals, Objectives and Policies of the County Transportation Plan.



October 1980 Traffic Counts



Directional Split Data For Indian Springs Morning Peak Period Traffic

1980 Traffic Volumes and Directional Split Data

Source:

Las Palmas Ranch

Traffic Study

LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

GRUNWALD CRAWFORD ASSOCIATES

668

indicates construction of a freeway between Route 1 and River Road. However, funding for this freeway is not on CalTrans' 5 year improvement schedule.

Plan lines for a proposed Route 68 freeway have been established by CalTrans and adopted by Monterey County. Traffic forecasts for 1995 indicate that major improvements will have to be made to Route 68 where it is presently a two-lane road. If it is developed as a four-lane freeway, the estimated traffic for 1995 would not exceed freeway capacity.

Daily volumes on local streets in the vicinity of Las Palmas are well below the capacities of these facilities. The daily capacity of a two-lane collector street is approximately 14,000 vpd. These data indicate that with the exception of the two-lane portion of Highway 68, traffic flow is good in the project vicinity during all parts of the day, and that little or no delays are experienced by motorists.

Directional patterns of traffic generated by the Indian Springs Subdivision were also obtained by Wilsey & Ham. The Indian Springs Subdivision, with 131 single-family units, is located on River Road, approximately one-half mile southeast of Las Palmas Ranch.

Similar travel patterns could be expected for the Indian Springs Subdivision and Las Palmas Ranch. The primary direction for morning commute traffic from the Indian Springs Subdivision is north on River Road toward the Monterey-Salinas Highway and east toward the City of Salinas.

IMPACTS

In the Wilsey and Ham Las Palmas Traffic Study, the following development factors were assumed: 700 single-family units, 880 multi-family units and commercial development around the Corey House with approximately 33,000 square feet of

floor area. Using these factors, a "worst case" analysis of traffic impacts was performed.

As an initial step, a traffic count program was undertaken to determine trip generation factors for residential developments in the site vicinity. Automatic counters were placed at the entrances to the Indian Springs and Toro Park Estates Subdivisions. Toro Park Estates, with 474 single-family units, is located along Highway 68, approximately one mile west of Las Palmas Ranch. Based on these traffic counts and information on the number of units in each subdivision, trip generation factors were obtained.

Indian Springs generates approximately 6.9 trip-ends per unit per day while the Toro Park Estates Subdivision generates 7.5 trip-ends per unit per day.(1) As these subdivisions are close to Las Palmas Ranch, they are expected to have similar trip generation characteristics. To allow for minor variations in the results, a generation factor of 7.5 trip-ends per unit per day was chosen for future single-family units of Las Palmas.

Trip generation factors for multi-family units and commercial facilities were obtained from Trip Generation, Institute of Transportation Engineers, a standard reference. The value for trip generation from multi-family units is 6.0 trip-ends per unit per day. Commercial facilities are expected to generate 116 trip-ends per day per 1,000 square feet of floor area. It is estimated that approximately 50% of the trips generated by commercial facilities at Las Palmas Ranch will remain within the project boundaries and will not add to external traffic volumes.

1995 traffic volumes in the vicinity of Las Palmas were then quantified to indi-

(1) A trip-end is defined as a trip which either originates or terminates at a given location. Total trip-ends are generally double the amount of round trips.

cate the effect of the ADC Policy Plan on future traffic conditions. The following assumptions were utilized in developing these 1995 volumes:

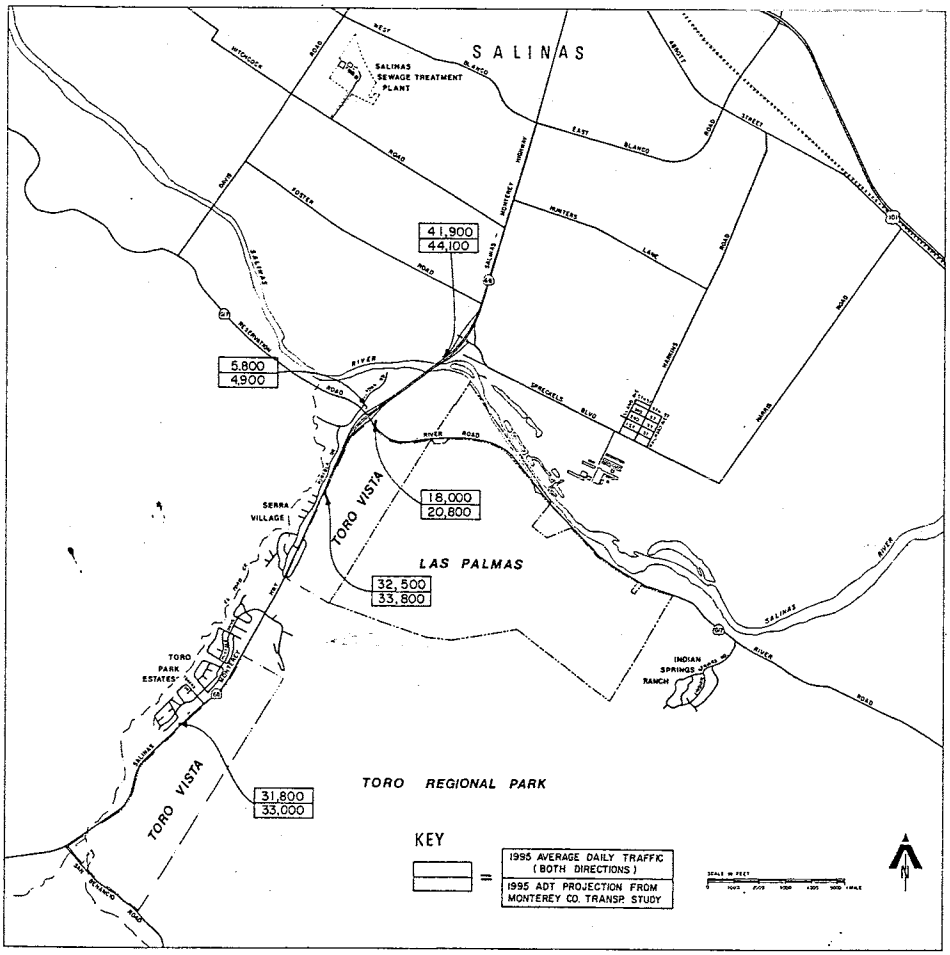
- The trip generation rates for single-family and multi-family units at Las Palmas will be 7.5 and 6.0 trip-ends per unit per day, respectively. Commercial facilities will generate daily traffic volumes at a rate of 116 trip-ends per 1,000 square feet of floor area.

- The directional split for project generated daily traffic would be 97.6% toward Highway 68 and thence, 72.5% toward Salinas. These daily directional split values were taken from the Monterey County Transportation Study because they are in substantial agreement with the peak-hour values obtained during the manual traffic counts done as part of this study.

- The baseline (without Las Palmas) 1995 traffic volumes on roadways in the project vicinity are based on the "H" Network adopted in the Monterey County Transportation Plan. Traffic volumes generated by Toro Regional Park and the proposed Toro Vista development are included in these 1995 projections.

The above trip generation assumptions were applied to the ADC Policy Plan to yield 1995 traffic volumes shown in Exhibit 2.9. The total trip generation attributable to the ADC Policy Plan is approximately 12,300 trip-ends per day.

The most significant increases in traffic volumes caused by the ADC Policy Plan would be on River Road, south of Highway 68, and on the eastbound on-ramps and westbound off-ramps at Highway 68. The 1995 projection for daily traffic from all sources on River Road is 18,000 vpd. The ADC Policy Plan would account for approximately two-thirds of this total.



1995 Projected Traffic Volumes

Source: Las Palmas Ranch Traffic Study

LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

GRUNWALD CRAWFORD ASSOCIATES

As the capacity of River Road is approximately 14,000 vpd, some improvements to this facility would be necessary. Without such improvements, traffic congestion could be expected during the morning and afternoon commute periods.

Level of service (LOS) analysis was performed at the intersections of the freeway ramps with River Road, using projected 1995 traffic volumes. Levels of service are qualitative descriptions of traffic flow characteristics, ranging from LOS A, free-flow, to LOS F, forced-flow.

The LOS analysis, based on the ADC Policy Plan, indicates that the intersection of River Road with the eastbound ramps would operate at LOS D (unstable flow) during the 1995 morning peak period. This would result from the large number of vehicles turning onto the eastbound on-ramp from the north and south. The intersection of River Road (also called Reservation Road at this location) and the westbound ramps is projected to operate at LOS E (capacity) during the 1995 afternoon peak period. This would result from the vehicles (approximately 1,000) turning left from the westbound off-ramp to southbound River Road. A large number of vehicles could be expected to queue on this off-ramp during the afternoon peak period. Traffic volumes along River Road during non-peak periods would be below the capacity of this facility and the LOS would be C (stable-flow) or better.

The preceding capacity and level of service analysis indicate that various roadway and intersection improvements will be needed along River Road as a result of the development of Las Palmas Ranch. It remains for subsequent analysis to determine what the nature of these improvements should be.

There would be a cumulative 1995 impact on Highway 68, west of River Road (on the two-lane section), caused by general growth of the community and all new developments. The ADC Policy Plan would contribute approximately six percent to

the total projected 1995 traffic volume for this segment of Highway 68. There would be no significant effects on the four-lane section of Highway 68, east of River Road. The project will add to the cumulative congestion at the Highway 68/Blanco Road intersection. The total 1995 projections for this location of 41,900 ADT (both directions) are well below the capacity of 60,000 vpd. This means that the ADC Policy Plan would not, by itself, necessitate any road widening along Highway 68 (either east or west of River Road).

An additional traffic generator in the ADC Policy Plan not included in the Wilsey and Ham report is the 3 acre neighborhood shopping center proposed near the eastern entrance to the site. The 3 acre site could accommodate an estimated 30,000 square feet of retail floor space. At 116 trips per 1000 square feet per day, 3,480 trips per day could be expected at full development. If the assumption is again used that 50% of the generated traffic will come from within the project, an additional 1,740 trips per day will be generated, bringing total project traffic to 14,040 trip-ends per day. Nearly all these would involve River Road.

This shopping center will further impact River Road, primarily by increasing the number of turning movements into and out of the site. Given the center's location, shown on the ADC Policy Plan, it will also bring outside traffic through a an essentially large residential neighborhood.

It should be noted that the total trip length for off-site area residents using the commercial center will be shorter than traveling outside the area to shop.

Because the Existing Policy Plan would allow a magnitude of development less than half that of the ADC Policy Plan, traffic impacts can also be expected to be less than half. For purposes of analysis, the same ratio of single-family to multi-family units is assumed as for the ADC Policy Plan and the same generation

factors are used. The Existing Policy Plan would also contain approximately 33,000 square feet of commercial floor space around the Corey House, but would not have a neighborhood shopping center; 50% of commercial traffic would be from outside the project. The following average daily trips would result:

44% single-family x 720 units = 318 units x 7.5 ADT/unit	= 2,385 ADT
56% multi-family x 720 units = 402 units x 6.0 ADT/unit	= 2,412 ADT
33,000 square feet x 116 ADT/1000 square feet divided by 2	= 1,914 ADT
	6,711 ADT

The directional split used for the ADC Policy Plan can also be applied to the Existing Policy Plan (97.6% toward Highway 68 and thence, 72.5% toward Salinas). The following impacts would result:

1. Average daily traffic on River Road in 1995 would be 12,400 vehicles compared to over 18,000 with the ADC Policy Plan. Las Palmas would account for about 54% (6,700 divided by 12,400). This expected level is below the existing design capacity of River Road (14,000). As a result, Level of Service "C" could likely be maintained.

2. The Existing Policy Plan would contribute about 3% of the total daily traffic to Highway 68 on the two lane section west of River Road.

3. It is estimated that the Level of Service for Highway 68 ramps would be one level below that of the ADC Policy Plan in 1995. That is, Level C for the intersection of River Road with the eastbound ramps, and Level D for the westbound ramps at River Road.

In summary, a comparison of the two plans for Las Palmas Ranch in terms of traffic impact shows that the Existing Policy Plan would generate about 52% less traffic than the ADC Policy Plan (6,700 ADT versus 14,040 ADT). Also, the LOS on River Road and the Highway 68 ramps by 1995 (with no additional improvements), would be at least one level of service better with the Existing Policy

Plan than with the ADC Policy Plan.

The Monterey County Department of Public Works responded to the Wilsey & Ham traffic study report with two major concerns:

1. "The results of our trip generation study produced trip generation figures of 7.0 trips per day per unit for Indian Springs, and 8.0 trips per day per unit for Toro Park Estates, with a weighted average of 7.8 trips per day per unit. As a result, we recommend that a figure of 8.0 trips per day per unit be used." (Letter dated April 21, 1981)

2. "The Monterey County Transportation Plan has established level of Service C as a goal (rather than E or F as suggested in the study) for County Roads. We, therefore, feel that those roads which are currently at, or above, level C should not be allowed to decline below level C, and that lesser existing LOS's be preserved. Any improvements to the roadway required to maintain those levels of service as a result of Las Palmas Ranch would be the responsibility of the Las Palmas Ranch developers." (Letter dated October 28, 1981)

In response to the first concern above, using the traffic study figure of 700 single-family units in the ADC Policy Plan and the County-recommended trip generation factor of 8.0 trips/day/unit, total project generated trip-ends would increase by 350 per day [700 x (8.0 - 7.5)] or about 2.3% of total project traffic. For the Existing Policy Plan, the increase would be 159 trips per day, or 2.4% of total project traffic. These increases are negligible and would not alter identified Levels of Service or other findings of significance. The fact remains that either alternative will significantly impact existing roadways and will contribute to cumulative declines in traffic service.

Answering the second concern, LOS C is attained in very few urban settings, especially during peak periods. Levels of service at the access ramps of Highway 68 to and from River Road can be expected to deteriorate over time to the levels projected by the report. LOS D for a freeway on-ramp during short periods is not unusual in an urban setting and is considered an unavoidable impact if the project is approved.

MITIGATION MEASURES

1. If the ADC Policy Plan for Las Palmas is approved:

   a. In order to maintain LOS C after 1995, River Road should be constructed to major street status (84 foot right-of-way, four lanes) from the Corey Home entrance to the Highway 68.

   b. River Road should be constructed to secondary street status (60 foot right-of-way, two lanes) from the Corey House entrance to the eastern property line.

   c. Right and left turns should be constructed on River Road approaches to the three site entrances.

   d. Left turn approaches should be striped on River Road approaches to northbound and southbound off-ramps to Highway 68.

2. If the Existing Policy Plan is approved:

   a. River Road should be constructed to secondary street status (60 foot right-of-way, two lanes) from the eastern boundary of the Las Palmas Ranch to the Highway 68.

   b. Measures (C) and (D) from the ADC Policy Plan above should be instituted.

3. Right and left turns on River Road approaches should be constructed at Entrance Areas A and B in Toro Vista, and the entrances to Rio Vista, Indian Springs and the Pedrazzi subdivisions.

4. The State and County should construct Highway 68 to four lanes between River Road and Highway 1. To this end, new development which would directly impact traffic on this segment (and which would directly benefit from its improvement) should be included in "zones of benefit"

established by the Board of Supervisors. The Board should direct the Department of Public Works to work with CalTrans and individual applicants within these zones to determine the level of improvement necessary, available state financing and a fair share formula for all future developers to pay into an improvement fund.

2.8 AIR QUALITY

SETTING

The proposed River Road ADC lies within the North Central Air Basin which includes Monterey County, Santa Cruz, and San Benito Counties. Within the Salinas Valley area, approximately one half of all pollutant emissions are attributable to vehicular traffic.

Presently, air quality in the Valley area is good due to its geographic location and exposure to periodic strong winds. However, temperature plays a critical role in the maintenance of acceptable air quality in the Valley. Generally, when standards are exceeded, it can be correlated to the occurrence of a temperature inversion which prohibits dispersion of pollutants.

The nearest monitoring station to the project site is the Monterey Bay Unified Air Pollution Control District, located in north Salinas. Five major air pollutants are monitored: Carbon monoxide (CO); sulphur dioxide (SO_2); nitrogen dioxide (NO_2); oxidant; and total suspended particulates (TSP).

Of these five, only photochemical oxidant exceeded State and Federal standards within the last three years. As a result, Monterey County was classified a "nonattainment" area by the California Air Resources Board and the U.S. Environmental Protection Agency. In 1980, the Federal standard for ozone (oxidant) was relaxed from 0.08ppm to .12ppm. However, as of this writing, Monterey County is still designated a non-attainment area for ozone.

A non-attainment Air Quality Plan has been prepared by the Association of Monterey Bay Area Governments (AMBAG) in conjunction with Monterey Bay Unified Air Pollution Control District. The Plan recommends general measures and policies regarding control of traffic flow; extension of public transit systems and other alternatives to commuting by private car; and the utilization of land use controls such as encouraging infill and creating balanced communities in terms of the jobs/housing ratio. Implementation of the Plan is the responsibility of appropriate local agencies. The Plan recommends that all large developments be reviewed by AMBAG, using the A-95 clearinghouse review process. This Draft EIR will also be referred to AMBAG for comment.

IMPACT

The primary air quality impact which would occur as a result of Las Palmas development would be the cumulative increase in existing air pollutants generated by vehicular traffic. This would be true of either alternative plan. While Las Palmas project traffic alone would not have a significant effect upon existing air quality, it would add, on an incremental basis, to the overall degradation of air quality in Monterey County.

Table 2.5 contains an analysis of project auto emissions while Table 2.6 shows the effect of those emission rates on basin-wide emissions.

These projected impacts do not consider changes in travel habits brought about by increasing gasoline prices or the likelihood that travel distances will decrease as urbanization occurs and services and employment are located closer to residential areas. It can also be expected that overall mobile source emissions will decline as a result of mandatory controls on new autos, the phasing out of older, higher polluting autos and the substitution of alternate forms of transportation over time.

TABLE 2.5

PROJECT EMISSIONS

Pollutant Type	ADT Existing Policy Plan	ADT ADC Policy Plan	Avg. Miles/ Trip	Emission[2] Factor (gm/mi)	Total Emissions Existing Policy Plan (gm/d) (tons)	Total Emissions ADC Policy Plan (gm/d)(tons)
Hydrocarbons	6653	12,300	12	3.6	287 K (.3)	531 K (.6)
Carbon Monoxide	6653	12,300	12	36.7	2930 K (3.2)	5417 K (5.9)
Nitrogen Oxides	6653	12,300	12	2.7	216 K (.2)	398 K (.4)

1. Calculations based upon following assumptions:

   a) Average vehicle speed of 19.6 mph (accounts for start-ups and stops, which generate the greater amount of traffic related air pollutants)

   b) Average temperature of 75° (F)

   c) % cold starts - 20.6; % hot starts - 27.3

   d) Average miles per trip based upon the following traffic flow assumptions:

   - 70% of project traffic would travel to/from (Salinas (8 miles, RT)
   - 15% of project traffic would travel to/from Monterey (22.4 miles, RT)
   - 10% of project traffic would travel to/from Fort Ord (13.6 miles, RT)
   - 2% of project traffic would travel along River Road (average of 20 miles, RT)
   - 3% of project traffic would travel locally to nearby commercial areas, or the proposed on-site recreation facilities (average of 6 miles, RT)

2. Based on 1985 car model year. Assumes a mix of new year and old year car models.

Source: Draft EIR, Subsequent EIR, Toro Vista Specific Plan, Williams, Plazek & Mocim, November 1980, and Grunwald Crawford & Associates.

Table 2.6 shows that the percentage increase in the amount of each pollutant generated by the ADC Policy Plan is about double that shown for the Existing Policy Plan. With either alternative, the project emissions and the basin-wide emissions can be expected to decline in the same ratio.

TABLE 2.6

PROJECTION OF AIR POLLUTION EMISSIONS
(Average Emission Levels, tons/day)

Pollutant	Current Conditions(1)	With Existing Policy Plan	% Inc	With ADC Policy Plan	% Inc
Hydrocarbons	22.5	22.8	1.3	23.1	2.7
Carbon Monoxide (CO)	147	150.2	2.2	152.9	4.0
Nitrogen Oxides (NOx)	18.4	18.6	1.1	18.8	2.2

(1) Monterey Bay Unified Air Pollution Control District (1977).

Source: Grunwald, Crawford & Associates

The above figures do not imply that existing pollutant levels in Monterey County would be immediately increased by the indicated percentage. Because pollutants are windborne, they can be distributed over a wide area. Thus, it is possible that the source area may only be marginally affected by the increase in pollutant emissions. However, the figures do provide an indication of how air quality may be affected basin-wide. Although the Las Palmas project would have an insignificant effect on existing air quality in the immediate vicinity, when considered cumulatively basin-wide it may be more significant.

MITIGATION MEASURES

The AQMP/NAP remains the best opportunity for promoting basin-wide air quality

improvement strategies. As specified in the AQMP/NAP, Las Palmas should be considered to the extent that it promotes AMBAG policies regarding infill and/or contiguous buildout development, and the provision of a balanced mix of residential and employment opportunities in new development areas. Both alternative plans for Las Palmas promote a mix of residential units at higher densities in new areas of concentration which decrease auto travel compared to a lower density alternative by decreasing the need for even more remote development to most housing needs. The proposals do not represent contiguous buildout or in-fill development in relation to Salinas but they do support AMBAG policies in terms of the long-range buildout of the Toro Area.

Public transit service should be provided to the project site. Bus stops could be located at the proposed project entrances along River Road. Walkways should be provided from residential areas to the transit stops, schools, recreation sites and community service centers.

An integrated system of bicycle path and walkways should be incorporated into the final project design. These pathways, which would link residences to the proposed school site and local shopping and recreational areas, should include an alignment along the south side of River Road.

2.9 PUBLIC SERVICES AND UTILITIES

2.9.1 Wastewater Management

SETTING

Las Palmas Ranch

Existing residences at Las Palmas are served by septic tanks and leach fields.

River Road ADC

The Indian Springs Subdivision has an on-site package sewer system. The developed Pedrazzi subdivision and approved Vista Del Rio and Pine Canyon Estates

subdivisions are served by, or are planned to be served by, on-site septic tank and leach field systems.

There are no sewer facilities existing or planned for Toro Vista. Salinas Utility Services maintains a treatment plant approximately 1.5 miles to the west of Las Palmas Ranch on River Road. The treatment plant could theoretically serve Las Palmas and Toro Vista projects if facilities and spray fields were expanded. In 1977, the Central Coast Regional Water Quality Control Board issued a Cease and Desist order prohibiting new connections to this system. This prohibition was reimposed on September 12, 1980. It cites, in particular: 1) discharges of raw sewage to the Salinas River, attributed to breaks in the river crossing (the plant is south of the river, and the spray fields north), levee breaks, and leakage; and 2) daily flows exceeding those permitted.

Las Palmas is within the study area used to develop the North Monterey County Facilities Plan, adopted in 1978 by the Monterey Peninsula Water Pollution Control Agency. The Agency, composed of the various sewer agencies in the area, has taken over all treatment and disposal facilities. Maintenance of collection systems remains with the member agencies. By the mid-1980's the Control Agency hopes to complete the regional plant, at which time the Salinas and other existing plants will be converted into sub-units of the regional system. The Facilities Plan sets forth present and projected populations in the Toro area, and indicated this area will eventually be sewered as part of the Salinas area system. Currently, the Salinas plant has limited capacity, and an interceptor is planned for construction to the ocean in 1983.

The State of California Clean Water Grant Program Proposed 1981 Project Priority List contains, at Monterey County's request, an "interceptor to regional system from Toro Park area", which would generally run north from the present Salinas Utility Services plant to join the Salinas interceptor. The Clean Water Grant

would be for up to 87.5% of total costs, with local revenue making up the balance.

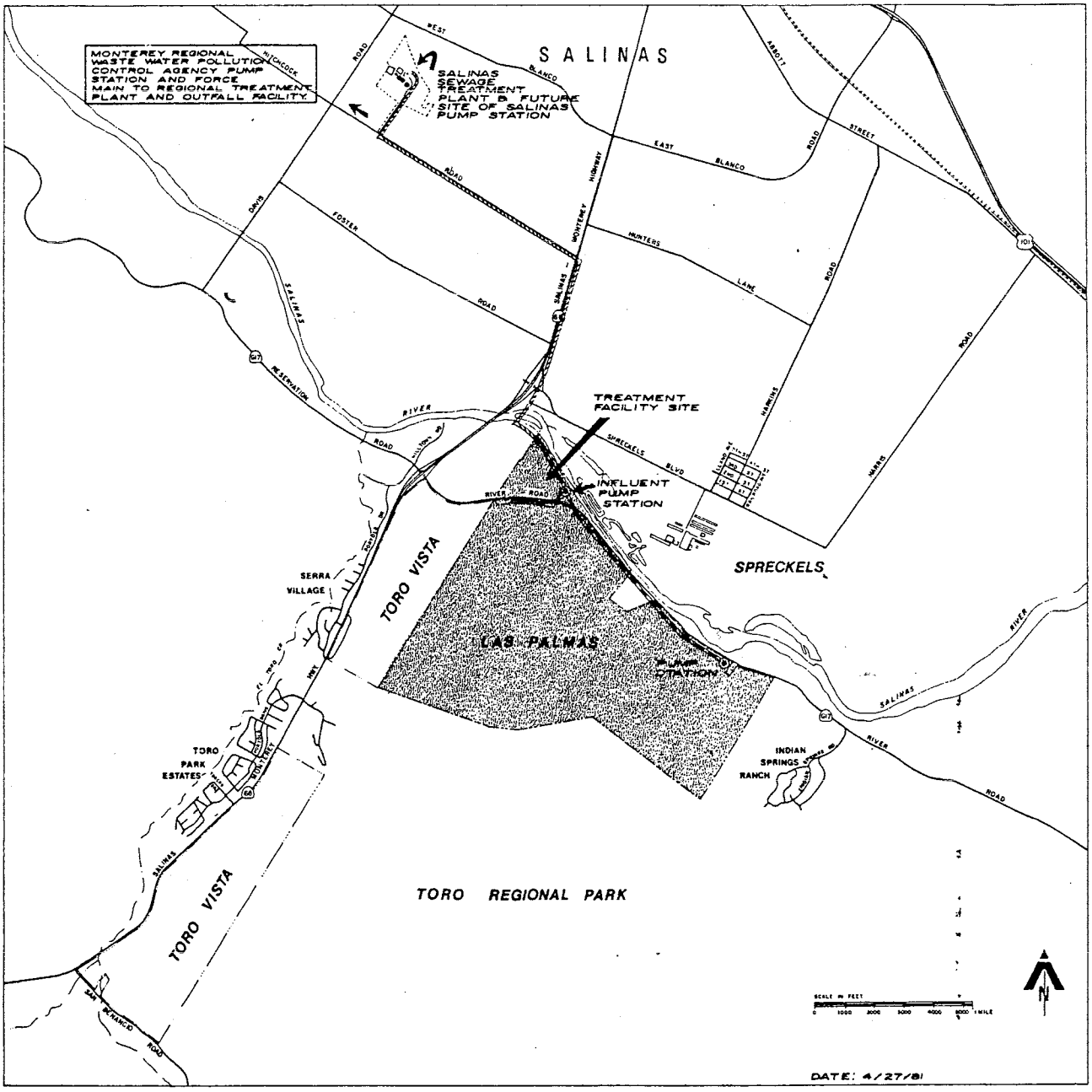
IMPACTS

Las Palmas Ranch

In October, 1980, the applicant for Las Palmas Ranch retained the firm of Engineering Science, Inc. of Monterey, to prepare various sewering alternatives for the site and to recommend the design alternative best suited for the needs of Las Palmas and surrounding properties. An impact analysis was prepared based on the level of development shown by the ADC Policy Plan with a buildout population of 4,490 (2.85 persons per household). With flows estimated at 80 gallons/person/day, total treatment capacity required for the ADC Policy Plan would be 359,200 gallons per day (and about 163,800 gpd for the Existing Policy Plan).

As part of the wastewater management study process, three on-site disposal alternatives, four treatment alternatives, and two system alternatives were analyzed. The engineer's best alternative was determined to be an aerated/faculative pond treatment system incorporating high rate irrigation disposal (flood irrigation).

The wastewater treatment and disposal facilities would be constructed in two stages, which would correspond to the construction and build-out of Las Palmas Ranch. The project design allows for connection to the Regional Wastewater Management System, if and when that system becomes available. The project design facilities shown on Exhibit 2.10 would be located on the northeast portion of the Las Palmas Ranch, north of River Road. Full development of the facilities would require approximately 12 acres for the treatment facility and 40 acres for irrigation with reclaimed water.



SEWER FACILITIES
PRELIMINARY ALIGNMENT OF OF CONVEYANCE SYSTEM

Legend:

STAGE 1

——— Las Palmas Ranch Study Area

STAGE 2

——— Connection to Regional System

* Final Determination of Stage 2 System to be in 1984-1986

SOURCE:

Wastewater Management Study: Las Palmas Ranch

LAS PALMAS

MONTEREY COUNTY, CALIFORNIA

GRUNWALD CRAWFORD ASSOCIATES

This proposed system is not tied in any way to the Salinas Utilities Services area and the design is capable of adaptation to a smaller project or to a larger project depending on the land use plan adopted. The facilities design proposal has been submitted to the County Health Department for their review.

The proposed site for the wastewater treatment facilities is in row crop production and within the 100 year flood plain of the Salinas River. The 40 acre irrigation area would be limited to animal feed crops, fiber crops, flowers, Christmas trees or firewood production. The facilities would remove from production 52 of the 55 acres in row crops. If connection is made to the regional wastewater treatment facility, the 40 acres would be converted to row crops. The 12 acres would be converted to row crops if economically viable.

The River Road ADC

With the exception of Las Palmas Ranch and Toro Vista, the undeveloped areas of the River Road ADC will most probably use individual septic systems. County Health Department standards on Regional Water Quality Discharge Requirements should reduce potential impacts to an insignificant level. The potential for failure of existing septic systems in the area is considered low.

Although no sewering plan yet exists for Toro Vista, the Specific Plan was adopted on the premise that no development could occur without the eventual design and construction of an approved sewage disposal system.

MITIGATION MEASURES

No development can begin until a viable community sewer system is constructed. The following measures have been identified as possible wastewater treatment methods:

1. The development of a new on-site (Las Palmas Ranch) wastewater treatment system.

2. The expansion (and improvement) of Salinas Utilities Services facilities through contribution or purchase.

3. Merging with (future) regional sewer systems through annexation and trunkline extension.

Of the three measures, use of Salinas Utilities Service facilities would mitigate many concerns (duplication of services, loss of agricultural land to a package plant, eventual tie to the regional system). It is also the most unlikely, given current operating difficulties.

The development of on-site facilities, with the potential for connection to a regional system, accomplishes both short or long term sewage disposal goals for both alternative plans and is thus a viable mitigation method. Given any proposed wastewater disposal system, potential impacts will be mitigated by discharge requirements of the Environmental Protection Agency, State Regional Water Quality Control Board, and the County Health Department.

The following specific measures are recommended:

1. An on-site (Las Palmas Ranch) disposal system should be designed with an eventual connection potential to a regional system.

2. Consideration should also be given to a design for a service area that would include Toro Vista as well as the Las Palmas Ranch.

3. In accord with State and County policy, a district should be formed to operate the wastewater control facilities. Capital costs would be financed by connection fees. The district should be formed at the time of Plan approval so that the agency could plan, implement, and finance needed improvements. Although a county sanitation district is easiest to form and could later provide water if necessary, a broad based

umbrella agency such as a County Service Area or Community Services District is recommended. An umbrella agency can provide a wider range of public services which have the potential to lessen impacts on other districts currently serving the area.

4. As proposed in both alternative specific plans, the 52 acres proposed for wastewater treatment facilities would revert to row crop production if a regional sewer service connection is made serving Las Palmas.

5. If the on-site disposal system is located as proposed, the treatment facilities must be protected from flood inundation by encompassing levees. This recognizes that the investment in levees will further frustrate the conversion to row crop farming if a regional connection occurs.

2.9.2 Water Service

At Las Palmas, four wells supply water to the property. Two are small domestic wells and two are agricultural; the latter each produce approximately 1,650 gallons per minute. The source of water for the entire River Road ADC is groundwater. The California Water Service Company serves the Salinas area and a portion of the ADC area. The balance of the River Road ADC is served by private wells or small community water systems.

IMPACTS

All units within Las Palmas, under either alternative, are to be served by a community water system. Preliminary design for the ADC Policy Plan indicates a system of three wells producing 1,000 gallons per minute, three storage tanks with a total capacity of 1,500,000 gallons, and a distribution system of 70,000 linear feet of pipe. The system for the Existing Policy Plan would be downsized in proportion to decreased demand for domestic water. As previously discussed,

no significant effects on the underground aquifier are anticipated by MCFCD.

The most significant impact on water service is the management of water supply and the maintenance of systems. No water supply system has been approved for Toro Vista although it has been estimated that domestic demand for that project appears to be well within the capabilities of both the groundwater supply and a simple storage and distribution system.

Other undeveloped properties within the ADC will most likely develop with individual private wells. No significant impacts are anticipated.

MITIGATION MEASURES

1. Because Toro Vista and Las Palmas are so closely interrelated, duplication of services in supplying water should be avoided; also there should be a single entity responsible for well drilling, installation and maintenance in this portion of the River Road ADC.

2. Design, operation and use of community water systems must be in conformance with the requirements of the Public Utilities Commission, the California Public Health Department, the County Health Department and the Monterey County Flood Control District.

3. The California Water Service Company should provide service to the area; if this is not possible, a County Service Area should be organized to develop and maintain water systems.

4. Although the adequacy of water for the development of the area has been documented, the developer of Las Palmas should establish that there will be no conflict in the source of supply for domestic use and agricultural use to the detriment of crop production.

Required by law for new construction:

1. Low-flush toilets (Section 17921.3, California Health and Safety Code).
2. Low-flush showers and faucets (California Administrative Code, Title 24, Part 6, Article 1, T20-1406F).
3. Insulation of hot water lines in water recirculating systems (California Energy Commission regulations).

Suggested Additional Measures

Interior:

1. Maintain water supply line pressure of less than 50 pounds per square inch by means of a pressure-reducing value.
2. Limit flush-valve-operated water closets to 3 gallons per flush.
3. Equip all drinking fountains with self-closing valves.
4. Insulate hot water pipes in existing structures.

Exterior:

1. Landscape with low-water-consuming plants wherever feasible.
2. Use mulch extensively in all landscaped areas. Mulch applied on top of soil will improve the water-holding capacity of the soil by reducing evaporation and soil compaction.
3. Preserve and protect existing trees and shrubs. Established plants are often adapted to low water conditions and their use saves water needed to establish replacement vegetation.
4. Install efficient irrigation systems which minimize runoff and evaporation and maximize the water which will reach the plant roots. Drip irrigation, soil-moisture sensors, and automatic irrigation systems are a few methods of increasing irrigation efficiency.

2.9.3 Schools

SETTING

Las Palmas Ranch

The River Road ADC is served by the Spreckels Union School District (K-8) with one facility in the town of Spreckels. The Salinas Union High School District serves grades 9-12; students from the ADC would attend Salinas High School, one of the three in the district. The enrollment within both districts has declined in the last several years due to declining birth rates.

It is expected that Spreckels will be near capacity as a result of already approved projects within the district. The high school would continue to decline in enrollment, however, even with students from the approved projects.

Development impact upon schools changes constantly due to changing political and economic factors. Because the primary source of school funding is based on average daily attendance (ADA), a school with excess capacity may benefit from growth due to increases in ADA.

When enrollment increases cause a school to exceed capacity, the school will be impacted as ADA does not provide sufficient funds for new construction. Construction financing options were drastically altered by Proposition 13. Prior to its passage, voters could authorize a tax rate increase to finance bonds for construction. If bonds were not passed, and they usually were not in California, a district was forced to institute measures such as double sessions, extended days, or year-round school. Such measures were fairly common in high growth districts in the 1950's and 1960's. In response, the Leroy Green lease-purchase program was adopted by the state which provided for tax increases to be used to make lease payments on school facilities financed by state funds. Proposition 13 generally eliminated the ability of district voters to authorize tax

increases for repayment of bond/lease obligations. It is the loss of local options that has created the problem of financing school construction.

On September 19, 1981, the Monterey County Board of Supervisors adopted Ordinance No. 2775 which established fees to provide temporary facilities to alleviate overcrowding from new development. The ordinance is based on SB201 and requires that school districts furnish the Board with information on conditions of overcrowding. If the Board agrees with those conditions, they have the authority to require fees for each new unit constructed within the school district. The following fee schedule was adopted, per bedroom for each housing unit with more than one bedroom: K-6 fee - $317.00; 7-8 fee - $96.00; 9-12 fee - $202.00 for a total of $615.00

IMPACTS

Las Palmas Ranch

The following enrollments could be expected using Monterey County's student generation factors of .48 (K-8) and .23 (9-12) per residential unit.

TABLE 2.6

LAS PALMAS RANCH STUDENT GENERATION

	Units	(K-8)	(9-12)	Total
Existing Policy Plan	720	346	166	512
ADC Policy Plan	1578	757	363	1120

Source: Grunwald Crawford & Associates

The Spreckels school, given projected enrollment increased from already approved projects, would be significantly impacted by the project.

If a capacity of 700 is used for a K-8 school, the Existing Policy Plan would create a need for about one-half of a new school while the ADC Policy Plan would generate enough students to justify a complete new facility.

A further problem within the Spreckels district is the location of the existing school across the Salinas River from the site. This location requires busing and may make the development of a new school at or near the site preferable to expansion of the existing school.

The impact on the Salinas Union High School District as a result of Las Palmas Ranch development is not expected to be significant. Lawrence M. LeKander, Superintendent of the Salinas Union High School District, states that high school enrollments from the Toro area have declined 10% in the last five years and present elementary school enrollments suggest that the decline will continue.(1)

The River Road ADC

Table 2.7 shows expected enrollments after full development of the River Road ADC. For analysis, it has been assumed that the Pedrazzi and Indian Springs subdivisions are developed and thus, already contributing students. New development impacts are then based on a general figure of 2,200 new units with the ADC Policy Plan and 1,375 units with the Existing Policy Plan.

TABLE 2.7

RIVER ROAD ADC STUDENT GENERATION

	Units	(K-8)	(9-12)	Total
With Las Palmas ADC Policy Plan	2200	1056	506	1562
With Las Palmas Existing Policy Plan	1375	660	316	976

Source: Grunwald Crawford & Associates

(1) Letter of Correspondence to Brian Finegan, Attorney for Las Palmas Ranch, May 27, 1981.

Development of the River Road ADC Policy Plan for Las Palmas would justify development of the new K-8 school and may necessitate the addition of classrooms at the present school. With the Existing Policy Plan, one new facility will be needed but could accommodate all expected enrollment increases from the ADC.

The impact of 316 to 506 additional high school students would not create the need for additional facilities. Superintendent LeKander states that 1,000 students are considered to be the minimum needed to justify a new high school. Much more so than for K-8, impacts on the high school are dependent on growth rates elsewhere in the Toro area. In this regard, Mr. LeKander estimates that if 3,000 new housing units are added to the Toro area in the next 10 years, an enrollment increase of 900-1000 students would be expected; not enough to warrant a new facility.

MITIGATION MEASURES

There are several existing means through which local government can ensure the provision of adequate school facilities.

1. Reservation of Land

   A county has the authority to require the reservation of land as a condition of subdivision map approval. This policy power is allowed by the school site dedication requirements of the Subdivision Map Act. Both Las Palmas Ranch alternatives provide for reservation of an elementary school site. However, there must be provisions for funding shcool construction for this measure to be effective.

2. SB 201

   As previously stated, the County adopted an ordinance as authorized by SB 201 which allows the assessment of fees for the provision of temporary classrooms, for a period not to exceed five years. This bill was designed as an interim measure to alleviate overcrowding prior to

permanent facility construction and could also be implemented to alleviate interim peak overcrowding.

3. AB 8 - Owners' Development Lien

   AB 8 (Education Code, Section 39327) authorizes a state-funded emergency temporary classroom program, and provides a means for acquiring funds for school facility construction directly from new development. With the acquiescence of the developer, a school district can establish a non-profit corporation with a lien on each of the subdivided parcels of a proposed development for the purpose of collecting an assessment for debt service on bonds to be issued by the corporation. The proceeds from the sale of the bonds would be used to construct new school facilities, which would be leased back to the school district. A local agency reviewing the tentative tract map for a development could make applicant acquiescence to formation of the non-profit corporation a condition of tentative tract map approval.

4. Developer Contribution

   Mitigation of identified impacts can be required as a condition of development approval which implies direct school district/developer negotiations.

In addition to these measures it is possible to establish a property tax for school construction. The school districts could call for an election for such a tax which could be levied on existing and/or new homes. This tax would be subject to elections every four years for continuance, and would require enabling state legislation for implementation. However, this school construction financing method is now used within the Chino, California, School District.

The following specific measures are recommended to mitigate potential over-

crowding impacts within the Spreckels Elementary school District, regardless of which alternative is approved:

1. Reservation of an elementary school site as proposed in both Las Palmas alternatives.

2. Implementation of SB 201 to provide temporary classroom facilities.

3. Construction of permanent classroom facilities through:

   A. State funded construction programs;

   B. And/or locally generated monies (developer contributions, AB 8, property tax increases, or other means).

The imposition of SB 201 fees will be adequate to mitigate potential high school impacts.

2.9.4 Fire Protection

SETTING

Fire protection is provided by the Salinas Rural Fire District (SRFD); the main office is located on East Alisal Road in Salinas. The District has mutual aid agreements with the Castroville Fire District, the Pajaro Fire District, and the California Department of Forestry for the North Monterey County Area.

SRFD Station No. 3 provides service to the River Road ADC. This station is located on Highway 68, near the junction with River Road. Response time to the eastern-most portion of the ADC is approximately 5 minutes. Station No. 3 is manned fulltime by a three-man shift, with three shifts in a 24 hour period. It is equipped with three vehicles, with access to a fourth vehicle when necessary. Economic constraints brought on by declining district revenues and state subventions have caused the SRFD to consider closing Station No. 3. Backup response to the area is provided by Station No. 2, with a running time of 5-10 minutes.

The California Resources agency has established a criteria to classify fire hazard areas within the state.(1) Vegetation, fire weather, and slope are the factors that determine the classification of a given area. The River Road ADC ranges from moderate to high hazard on the Fire Hazard Severity Scale.

IMPACTS

There are two forms of development related fire protection impacts: 1) the influence of development upon an area's wildland fire hazard, and 2) the financial impact on a fire service agency caused by an increased demand for services.

The cumulative effects of development will increase fire hazard potential by increasing human activity and by placing structures in an area subject to wildland fires. If a ground fire should start in such an area, the first responsibility is to structure protection; as a result, efforts are diverted away from the ground fire, often allowing it to spread uncontrollably.

In terms of service provision, the most significant impact of this project on fire protection is also cumulative in nature. While each individual project in the River Road area may have only a minor effect on the Fire District, all the projects taken together could necessitate the need for additional manpower and equipment.

According to the SRFD chief,(2) any significant development of the Las Palmas Ranch, when combined with approved developments to the east along River Road (Pine Canyon, Pedrazzi, Indian Springs, and Vista del Rio), could necessitate the development of an additional station in the River Road area. This would be

(1) A Fire Hazard Severity Classification System for California's Wildlands, State of California, Department of Conservation Division of Forestry, 1973.

(2) Draft Fiscal Impact Analysis, Las Palmas Ranch, LeBlanc & Company, December 1981.

in addition to the development of self-sustaining water system with full hydrants, as required in other recent developments in the area. A review of response times to Las Palmas from other stations and the level of volunteer assistance available to SRFD will indicate the timing of a new River Road facility if and when needed.

The estimated capital costs of a new station would be some $250,000 - $400,000, including land costs; a pumper and grass truck would be an additional $130,000 together. Current annual operating costs for 24 hour coverage by a three man crew would be $300,000. Savings would be possible if a portion of the coverage were by volunteer firemen.

MITIGATION MEASURES

1. Physical means of mitigating fire protection impacts:

   a. Roadways should be developed in accordance with the fire protection standards of the Safety Element of the Monterey County General Plan and the Salinas Rural Fire District.

   b. Construction should be located away from dense vegetation, and dead plant material should be removed where it creates a threat of wildland fire. (A grazing management plan mentioned earlier under Vegetation and Wildlife mitigation measures could reduce grass fuel loading.)

   c. Fire hydrants, water storage (1,500,000 gallons), and water presure should be provided as required by the County and Salinas Rural Fire District.

   d. Only fire resistant roof materials should be used.

   e. The CC&R's for all new subdivisions should include requirements for fire protection practices.

. A system of fire breaks should be developed and maintained around residential areas.

g. An emergency access road, as depicted on both Las Palmas alternative plans, should be required for evacuation or emergency vehicle entrance at the southwestern boundary of the site.

2. Means of mitigating fiscal fire protection impacts:

The District does not have the fiscal resources to develop additional stations, nor to staff them. The only way to develop a new station within the River Road ADC would be through developer contributions or special assessments. With the present Fire District's 13.5 percent participation in property tax receipts, some $222 million in assessed value would be required to support the $300,000 annual operating costs. This would necessitate an average $114,000 assessed value for the potential units (1,578 at Las Palmas plus the already approved units in the ADC), an average value similar to that envisioned for housing within the Las Palmas Ranch. Fewer units or lower cost units reportedly would generate insufficient tax support for the station, while probably still generating the need for the station.

At present tax rates, funding of the full operating cost of a new station would not be feasible until nearly the end of the buildout period projected for Las Palmas Ranch (assuming the other units farther east in the ADC are completed). Alternatives for earlier development would be 1) utilization of volunteers, 2) limited hours of fire protection from the new station, or 3) a special assessment or user fee to supplement the property tax support of the District. While a user fee proposal for the District was recently defeated by the voters, increasing fire insurance premiums resulting from

poor fire protection may encourage electoral support of a user fee structure in the future. District reorganization since the last election could considerably influence the voting pattern as well.

2.9.5 Police Protection

SETTING

Las Palmas Ranch

Police services are provided by the Monterey County Sheriff's Department on Patrol Beat No. 4. This beat extends from Los Laureles Grade east to Spence Road, north along Highway 101 to Blackie Road, west to Marina and south to Los Laureles Grade. Beat No. 4 is covered by one patrol deputy during the daytime hours, and at night one patrol deputy covers both Beats 3 and 4. Detective and transportation units pass through Beat No. 4 on a regular basis. Response time to the project area for the Sheriff's Department is approximately 15 minutes.

IMPACTS

Under either alternative of the Las Palmas Plan, increased demand for police services would result. Calls for service can be expected to be more numerous for the ADC Policy Plan due to a larger population, more areas of higher density, and greater commercial floor space, presuming commercial uses are found to be consistent and are implemented.

According to the head of the Sheriff's patrol division, service needs are determined by the incidence of crime in the area rather than the population. The area is considered a low crime area and would be expected to remain so with the development of the Las Palmas Ranch project. It is believed that the additional population, as a result of the ADC Policy Plan, would not require the initiation of a new beat, thus there would be no substantial increase in Sheriff's Department costs as a result of the proposed project.

Although this was the conclusion of the Sheriff's Department, the cumulative effects of the various projects in the area, including Vista del Rio, Toro Vista, and Las Palmas Ranch could conceivably increase at some point the public's demand for police services. The average cost of a deputy sheriff, including benefits and the operating costs of a vehicle, is presently just over $40,000 per year; full 24 hour protection would require five officers at a cost of approximately $200,000 per year. Being extremely conservative and assigning this level of service to Las Palmas alone would result in costs of about $48.00 per capita, the average per capita cost calculated by McDonald and Associates in the EIR for the Monterey II-Laguna Seca (Daon) project. A more realistic assessment might be to assign such coverage to the population of 10,000 persons forecast for the entire Toro planning area including Las Palmas Ranch. This would generate a per capita annual police cost of $20. A smaller population would, of course, raise the per capita amount.

MITIGATION

1. The Las Palmas Ranch developer should consider on-site patrols and private gates to major residential areas.

2. Measures to reduce crime potential should be incorporated into the project design, according to criteria of the County Crime Prevention Officer. Such measures include:

   a. Main entrances should consist of a single access drive with ingress and egress clearly marked.

   b. Landscaping, when fully mature, should allow the observation of housing units from the ground up to four feet.

   c. Lighting should be used to allow good visibility from patrol cars.

d. Residences should have their address posted nearest the roadway and well lit.

2.9.6 Public Utilities/Energy

SETTING

Electricity and natural gas are supplied by Pacific Gas & Electric Company. The third major fuel type, gasoline, comes from suppliers in northern and central California. There is a gas main at Reservation Road and Highway 68. A 12KV line runs through the project area.

IMPACT

Las Palmas Ranch

Development would cause two stages of energy consumption: the energy needed during construction, and the energy required for operation and maintenance of the development.

The energy needed for construction would not be significantly different from other developments of comparable scale. Site designs which cluster development and minimize the need for road development and extended service delivery systems require less construction energy per unit than sprawling large lot developments. Both the Existing Policy Plan and the ADC Policy Plan have been designed with minimal roadways and clustered development site, which should result in an efficient energy use during the construction phase.

The most significant quantities of energy would be for the operation and maintenance of the development. The amount of electricity and natural gas to be consumed by residential uses in either of the alternate Las Palmas Ranch proposals is outlined below. These projections are based on current usage trends and do not reflect probable reductions brought about by rising prices or local, state, and federal regulations.

Clustered units are proposed which result in decreased overall energy use and allow more common open space for walkways and bikeways. In terms of gasoline, residents of the Existing Policy Plan would consume about 2.7 million gallons annually.

TABLE 2.8

LAS PALMAS RANCH
ANNUAL ELECTRICITY AND NATURAL GAS CONSUMPTION

Existing Policy Plan	KWH/yr.	Therms/yr.	Total KWH	Total Therms
279 single-family units	8500/unit	800/unit	2.37 million	223,200
441 multi-family units	5000/unit	580/unit	2.21 million	255,780
			4.58 million	478,980
ADC Policy Plan				
503 single-family units	8500/unit	800/unit	4.28 million	402,400
1075 multi-family units	5000/unit	580/unit	5.38 million	623,500
			9.66 million	1,025,900

Source: Grunwald Crawford & Associates

At an average cost of .06¢ per KWH, .40¢ per therm and $1.50 per gallon of gasoline, total energy costs per year can be expected to be about $2.7 million for the Existing Policy Plan and $5 million for the ADC Policy Plan (about $3500 per household, per year, in 1981 dollars for either alternative).

The River Road ADC

Provision of electricity and natural gas service to the River Road ADC will not stress the existing capacities of any of the involved agencies. New distribution systems will be required, however.

There are no significant shortfalls in energy supply nor any significant problems in service availability expected. From a regional energy standpoint, the levels of residential and supportive development proposed represent an insignificant impact on electrical, natural gas, and gasoline delivery systems.

The primary impact of any development would be if it were to result in unnecessary energy waste. Mandatory and advisory energy conservation policies concerning construction and operation of new development have been instituted by national and state legislation. Given this situation, any new project will be more energy efficient that existing development. However, with the implementation of local policies, and the use of energy conserving design features, consumption energy rate can be reduced even further.

MITIGATION MEASURES

1. Consideration should be given within planned unit developments for limited professional office use and a liberalization of in-home occupations. Continued improvements in mass communication technology will allow more work in the home, further reducing trip demand.

2. Higher density residential development, and clustered residential development should be encouraged. Higher densities lessen per capita energy use in several ways, primarily related to a corresponding reduction in the living area. Thus less energy is required to construct each unit, and to operate and maintain the unit over its useful lifetime.

   As densities are increased from the low (1 unit per 2 acres) to the medium range (6-7 units per acre) the economic feasibility and efficiency of public transit systems also increases.

3. Each residential unit should be afforded adequate solar access for the operation of active and passive solar systems. Locating structures with their major axis oriented within 22.5° of true east/west is generally the best means to insure adequate south-facing solar access. For single-family homes, the orientation is fairly simple to implement as is full access to the south wall for passive solar design. For multi-family units, orientation and access are more difficult; generally south roof access for active space heating or domestic water heating systems is considered sufficient.

   The site has significant potential for wind generated power, especially as technology for individual generators improves. This factor should be considered in project design.

4. Careful design of structures to utilize solar access and to control heat loss and heat gain can achieve significant energy conservation. When these design elements are coupled with passive design features (thermal storage units, south facing glass, domestic hot water systems and other energy conserving components), the energy conservation potential greatly increases. Support structures built by the developer such as commercial areas, swimming pools, recreation and community buildings should make maximum use of alternate energy sources both to reduce operation costs and to serve as community examples.

5. Other features can have less direct effects on energy consumption.

   a. Landscaping plans should consider the shading effects of plant species and also the potential to interfere with desired solar access. Plantings can affect site micro-climates thereby reducing heating and cooling needs.

b. Consideration should be given to wood lot management and a community farming area. Management could be a duty of the Homeowner's Association. An estimated 10 acres of eucalyptus properly planted and maintained could provide supplemental firewood to residents as well as serve as windbreaks at strategic locations. Community farming plots in higher density areas can reduce food costs and the need for travel.

The use of a portion of the property for agriculture has the potential for groundwater recharge as well as the ability to produce a usable crop.

c. The addition of pedestrian and bicycle paths to the internal circulation system could further reduce the need for automobile use.

2.9.7 Energy Conservation

(This section is incorporated under mitigation in 2.9.6 Utilities/Energy)

2.10 ARCHAEOLOGICAL/HISTORICAL

In the "Archaeological Survey" (See Environmental Resources Inventory, Appendix A) by Gary Breschini and Trudy Haverstat of September 1977, it is noted that:

> "No archaeological resources were located during the intensive field reconnaissance, but historical resources were located. These consisted of the remains of an early adobe and of a Victorian ranch house. Proposals were made for the preservation/mitigation of these structures through additional evaluation by a qualified historian specialist. With these exceptions, no archaeological resources are known or suspected in the Las Palmas property."

The history of the area is documented back to 1795 and the first known occupation in the Buena Vista area by Jose Maria Soberanes and his father-in-law, Joaquin Castro. A land dispute arose, with ownership claimed by Father Vinals of Mission San Carlos; the family lost the land in 1802.

About 1822, then Governor Sola gave the landgrant to Santiago and Jose Mariano Estrada, who reportedly built the adobe mentioned above. It has a long history as an arsenal, fiesta hall and school.

In 1872, Hiram Corey returned to California and leased 7,725 acres of the Buena Vista Ranch and established a stock ranch, purchasing the land in 1883. In 1889 he sold the ranch but repurchased 1,620 acres on the Salinas River to make his home in picturesque surroundings. In 1891 he built a residence of grand architectural proportions and it was one of the show places of the county.

The Corey House has been partly restored and is proposed to be used as a social center in both the ADC Policy Plan and the Existing Policy Plan.

The archaeological and historical resources of the Vista Del Rio, Pine Canyon Estates and Toro Vista subdivisions were identified and assessed, in the respective EIR's for these projects. Specific mitigation measures were proposed for the conditions found within these areas.

The only areas within the River Road ADC which have not been developed nor assessed are areas "A" and "B" (Exhibit 1.2).

IMPACTS

Las Palmas Ranch

No archaeological impacts are expected from the Las Palmas project. However, no subsurface testing was conducted and resources could be uncovered during excavation for the project. The property owners have no plans to preserve the adobe since the ruins appear to be beyond restoration as almost nothing remains.

The River Road ADC

The potential development impacts within the Vista Del Rio, Pine Canyon Estates and Toro Vista projects were identified in their respective EIR's. It is anti-

cipated that there would be no historical/archaeological impacts in the potential development areas "A" and "B".

Prior to development approval, an archaeological/historical reconnaissance should be conducted. This could be regulated through the County's environmental assessment process.

MITIGATION MEASURES

1. Conduct historical/archaeological reconnaissance before development of Areas "A" or "B", shown on Exhibit 1.2, and require implementation of appropriate mitigation measures as a condition of development approval.

2. Should any find be encountered during construction, stop all work within 50 feet of the find, and contact the Archaeological Regional Research Center at Cabrillo College (408) 425-6294, and the County Planning Department at (408) 422-9018.

3. In the Las Palmas Area, preserve as open space (or excavate, scientifically) the area around the adobe site as a means to retrieve the historic artifacts and data on the dimensions, materials and source of materials used in the structure.

3.1 CUMULATIVE IMPACTS

The cumulative effects of existing and proposed alternative developments within the proposed Area of Development Concentration (the "project" of this EIR) have been identified throughout the report.

Table 3.1 lists projects within the entire Toro Area, which includes the ADC. The primary cumulative impacts of these projects include:

1. Gradual change will occur in the rural character and ambiance of the Toro Area. Many Toro residents chose this area because of the rural life style and the predominance of large lot single-family homes. This concern for rural character is written into the present Toro Area Master Plan as one of its major goals. This rural ambience will gradually change to a more urban setting with pockets of higher density interspersed with rural and open lands. Housing type mix will also occur with the likely effect of changing the long-term social and economic make-up of the community.

   Highway 68 is a designated scenic route, and River Road passes through a largely rural and open area; conversion of adjacent undeveloped lands to residential use could significantly alter viewsheds. The sense of being in the rural countryside would gradually be eroded as residential development expands throughout the area.

2. Continued loss of open space, which in turn results in decreased wildlife habitat, watershed and grazing lands.

3. Service levels on Highway 68 and River Road would continue to decline. Cumulative increases in traffic would necessitate improvements to River

TABLE 3.1

TORO AREA PROJECTS

Development	Acres	Units	Population	Status
*Toro Vista	1,085	599	2,110	Specific Plan adopted.
Toro Hills Estate	39.28	31	97	Tentative Map Approved. Waiting for sewage connection ban to be lifted.
The Meadows	60	121	377	Approved. 60 units under construction. Waiting for sewage connection ban to be lifted.
Corral De Tierra Oaks Unit	159	60	188	Approved. Under construction.
Tierra Meadows	46.5	23	72	Approved. Lots being developed.
*Pine Canyon Estates	88	60	251	Tentative Map approved.
Geodetic Subdivision	60.6	16	50	Tentative Map approved.
*Vista Del Rio	93.7	80	261	Approved.
Mount Toro Ranches	52.8	15	50	Approved.
*Heritage Park	20.7	20	63	Approved.
Corral De Tierra Highlands #1	19.2	9	28	Approved.
Toro Sunshine	14.9	44	138	Tentative Map approved.
Hamilton Condominiums	1.49	9	28	Tentative Map approved.
Mesa Del Toro #2	60	13	41	Approved.
Mesa Del Tierra	57.5	12	38	Approved.

*Projects within River Road ADC (see Exhibit 1.2, Page 5)

Source: Monterey County Planning Department

Road including right and/or left turn lanes at secondary roadway intersections; signalization at some intersections; protected acceleration lanes; and additional through lanes at selected locations.

Cumulative development would increase the need for expanding Highway 68 to four lanes west of the River Road interchange, together with interchange improvements discussed earlier.

4. Maintaining air quality standards in the air basin will be increasingly difficult as the Toro Area approaches full development with a population of 10,000 persons and 6,000 autos. Given the predominantly residential character of proposed developments within the Toro Area (i.e., little or no commercial or employment centers), most future residents would depend almost entirely on the automobile for transportation to nearby jobs (Salinas and Monterey), shopping and entertainment areas.

5. Capacities at Spreckels Elementary and Salinas High Schools would be stressed. An additional elementary school site would have to be dedicated and both temporary and permanent classrooms provided for K-12 students.

6. In an era of budget constraints, the increasing demand for public services in non-urban areas will foster greater dependency on a "user pay" approach and thus force more families out of the housing market. The capital and operating costs for a multiplicity of special districts, "zones of benefit", and private service entities providing a full array of infrastructure needs may be so costly that only high-income housing proposals will be feasible in the Toro Area. Although the intensity of development allowed under existing policies would be less damaging to the environment, the greater density allowed under an ADC would provide

a broader funding base for services.

7. Despite federal, state and local efforts to conserve energy, the level of development anticipated will result in a gradual increase in energy demand. Due to the area's distance from community services and or facilities, (shopping, jobs, entertainment, libraries), the consumption of fuel per household in the Toro Area for transportation would probably be well above the average per household in Salinas.

3.2 UNAVOIDABLE ADVERSE IMPACTS

A list of unavoidable adverse impacts associated with the project is shown in the Summary, at the beginning of the report.

3.3 PROJECT ALTERNATIVES

3.3.1 No Project

This alternative would keep the Las Palmas Ranch and other undeveloped lands without project approval in their present state with the result that the impacts identified in the EIR would not occur, for the most part.

The No Project alternative has merit, both in the short and long term. Following are several immediate beneficial effects:

1. The Toro Area General Plan is being adopted and the approval of the project could prejudice the planning process.

2. There is a need for Highway 68 improvements. No financing mechanism for improvements yet exists and the project could add to cumulative traffic impacts.

3. Other urban services, particularly sewer, schools and fire protection, are being impacted by existing development. Projects already approved but not constructed will further impact these services.

4. The row crop farmland would not be taken out of production.

In the long term, undeveloped areas will continue to be valuable for agricultural, open space, wildlife habitat, and watershed. While it is true that cattle grazing is not currently economically viable on the Las Palmas Ranch, other agricultural pursuits could be investigated. As an example, according to the County Planning Department, the land might be productive for grazing as a thoroughbred horse ranch. (The economics of such an operation is not within the scope of the EIR).

A "no project" would also mean that the proposed affordable housing would not be available and development pressure could increase elsewhere on prime agricultural lands in the Salinas Valley.

3.3.2 Alternative Location

There are alternate locations for the type of development proposed in the ADC Policy Plan which could accomplish several of the applicant's development goals, chief among them is meeting the strong demand for housing and preserving prime farm land. One such location is the Salinas northeast annexation area. Apparently, many existing urban services could be made available and development would be generally contiguous to the existing city, which would lessen certain other impacts such as the traffic on Highway 68. However, the full environmental and fiscal impact on the city's infrastructure would have to be assessed before making a firm recommendation.

3.4 GROWTH INDUCEMENT

The project will be growth inducing in several ways. The present rural nature of the River Road ADC area will be altered to a more urban character; in combination with development already existing in the Highway 68 corridor, this area could become a major residential community attracting growth away from Salinas

by virtue of the residential environment, the provision of low and moderate income housing, and support services (commercial, schools). This growth would occur in a manner not anticipated by the Monterey County General Plan or the City of Salinas General Plan.

Because the project is being considered before the update of the Toro Area Master Plan, it could also serve as a precedent for other properties in the Toro Area. Policies of the proposed River Road ADC signal a basic change from the rural policy intent of the existing plan.

Despite the provision of public utilities and services to Las Palmas and Toro Vista, the growth producing impact on adjacent lands is limited. These lands are either already developed, under public ownership (Toro Regional Park), or unsuitable for development.

An exception is those properties lying east of Pine Canyon Road. Although the Board of Supervisors made a policy decision not to allow urban expansion in this area, adoption of the River Road ADC could lead to pressure to reopen development discussions.

3.5 IRREVERSIBLE ENVIRONMENTAL CHANGES

Implementation of the project would induce several irreversible environmental effects. These would include consumption of non-renewable resources including energy during construction and permanent commitment of resources to the maintenance of development.

Development of Las Palmas Ranch would also result in the irreversible commitment of prime agricultural soils to residential and public facility use. Grazing lands could also be lost, although much of the property would remain in open space. An open space management plan would conceivably include some provision

for continued grazing if prehaps only on a seasonal basis.

The provision of roadways, circulation systems, and public utilities tend to ensure that the property will remain in residential and/or commercial use during future generations and will not revert to agricultural production.

3.6 SHORT-TERM USE VERSUS LONG-TERM PRODUCTIVITY

The proposed alternatives for Las Palmas Ranch would diminish long-term agricultural productivity by committing prime agricultural soils to urban uses. The development plans would produce long-range beneficial economic effects for the property owner and provide long-term housing needs for a segment of Monterey County residents including 15% of the units for qualifying low and moderate income families.

The current use of the project site provides agricultural productivity, open space corridors, riparian habitat, and scenic landscapes. Development of the property would reduce the level of production on the agricultural acreage and promote a diversity of land uses at the site. Open space along the Salinas River would be preserved which would limit disturbance to riparian habitat. Scenic views of the property would be partially obstructed, reducing the rural character of the site. This effect could be alleviated to a certain extent by the use of landscaping and through sensitive building design.

4.0 REFERENCES

4.1 LITERATURE

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Wilsey and Ham, Las Palmas Ranch Erosion and Drainage Control Program, May 1981.*

Wilsey and Ham, Las Palmas Ranch Traffic Study, January 1981.*

4.2 Persons and Agencies

Lynn Mounday, Monterey County Planning Department
Dave Young, Monterey County Planning Department
Cathy Stein, Monterey County Planning Department
Walter Wong, Monterey County Health Department
Andy Hood, State Health Department
Eric Gobler, Regional Water Quality Control Board
Ron Lundquist, Monterest County Public Works Department
Chief Don Eberle, Salinas Rural Fire Department
Capt. Roger Chatterton, Monterey County Sheriff's Department
Michael Johnson, Monterey County LAFCO
Owen Stewart, Monterey County Flood Control District
Wilbur Smith, AMBAG
William J. Roberts, CalTrans
Frank Cooper, Spreckles School District
Lawrence LeKander, Salinas Union High School District
Dean Wagoner, California Water Service Company
R.H. Dennis, Pacific Gas & Electric
Robert Chan, U.S. Army Corps of Engineers
Z.M. Torres, Pacific Telephone
Dan Laughlin, Department of Fish and Game
Michael Graham, Monterey Regional Water Pollution Control Agency

*The above documents have been incorporated in this document by reference and may be reviewed at the Monterey County Planning Department, 240 Church Street, Courthouse, Salinas, CA.

APPENDIX A

Initial Studies

1 - Proposed River Road Area of Development Concentration

2 - Las Palmas Specific Plan

INITIAL STUDY: RIVER ROAD "AREA OF URBAN CONCENTRATION" GENERAL PLAN AMENDMENT

GEOLOGY/SOILS

1. One fault exists: Reliz Rinconada; parallel to River Road.

   Others may exist, there has been no definitive study.

2. Some areas within the area under consideration are subject to liquefaction due to the sandy nature of soils and a high groundwater potential.

3. Twenty soil types exist in this area.

   Slopes vary from 0 to over 75%.

Degree of Slope	% of Total Area	Erosion Hazard
0-10%	50%	Negligible
10-30%	26%	Moderate
30-50%	12%	High
50%	12%	Severe

Agricultural Classes vary from I to VIII (Best to Useless)

Agricultural Class	% of Total Area	Potential Use
Class I & II Soil	approx. 10%	Any Agricultural use
Class III Soil	approx. 25%	Row Crop & Orchard under certain management practices
Class IV Soil	approx. 21%	Slopes limit use to some grains and grazing
Class V-VIII	approx. 44%	Watershed, habitat, open space, some housing, but with difficulty and greater environmental impact.

4. Principal Soil Problems

   a. Erode easily = Maintenance due to silt on downslope land and roads and drainage ways.
   b. Percolation = Too fast or too slow; not suitable for septic tanks (At urban density septic tanks would not be feasible as a method of waste disposal.)
   c. Expansive Clay Soils = Foundation problems.
   d. Soils on Slopes = Soil Creep/Lack of Stability

RUNOFF/FLOOD HAZARD

1. Rapid runoff from steep slopes onto flatter lands near River Road.

2. Sediment load is dumped on these alluvial fans.

3. No permanent ponds or stream channels; channels exist as erosional features; urbanization requires specific drainage structures at some expense, and siltation basin removal/maintenance program.

4. Areas along River Road are subject to flood hazard from Salinas River during 100 Year and greater storms. Lower reaches of drainage channel's are also subject to localized flooding.

Note: Removing development from flood potential could remove 3-5% of flatter lands from development consideration.

VEGETATION/HABITAT

Chamise/chaparral	20-25% land area on slopes
Oak woodland	15% scattered and on drainages
Grasslands	10-25% grazed
Farmed and developed	35-55% homes, crops, roads, etc.

- o No specific survey for either plants or animals has been done. Technical report and survey should be done.
- o Prime impact on habitat would be in oaks, chaparral and drainage ways, however any sensitive species will be impacted if urbanization occurs.
- o Off-site impact on Salinas River riparian corridor will occur.

SCENIC/ODOR/NOISE

Urbanization of the area could lead to:

1. Loss of open space, cluttered development, spread along River Road, visible from Salinas and Highway 101.

2. Odors could result in an impact from Spreckels, local sewage package plants, agricultural neighboring uses.

3. Traffic and human-generated noise as well as that of domestic pets is more concentrated and hence more significant in a densely populated urban area.

4. Litter along River Road will increase.

5. Lot owner's views will be more likely to impinge on one another.

TRAFFIC/ACCESS/CIRCULATION/AIR QUALITY

1. Requirements to improve River Road would eventually be significant.

2. A well-planned circulation system could be developed, however, projects to date have all developed individual circulation and all exit on River Road. The Bridge across the Salinas River at Spreckels, shown on the Toro Area Master Plan, would be expensive to implement, and might have environmental impacts of its own.

3. Traffic volume would impact South Main Street in Salinas as well as westbound Highway 68 traffic.

4. Channelization, new lanes, turn pockets, and perhaps signals at the 68 Freeway onramp might be required.

5. River Road is the only ingress/egress to the area. Chualar River Bridge, to the South, is inadequate for traffic at volume.

6. The commute to present work areas is significant.

7. Auto emissions and fireplace emissions would increase and be concentrated if the area is urbanized.

8. The area might be subject to long term effects of pesticide spray from upwind agricultural lands.

PUBLIC SERVICES AND FACILITIES

Sewage

1. Urban density will require sewage treatment facilities.

2. Individual package treatment plants would be run by government agency. Costs and timing are unknown.

3. Proliferation of individual package plants would be economically wasteful if the regional treatment plant becomes the future treatment alternative.

4. Number 3 implies LAFCO action to form a sewer district in the Toro area.

5. Sprayfield required to dispose of treated effluent for an urban concentration would be extensive and significant.

6. Zones 2 and 2A encompass almost all of the area under consideration. The project would be to develop an areawide distribution network, treatment plant, and whether existing mutual systems could be incorporated, or would remain as islands.

Water

1. Total pumpage required for an area of urban concentration cannot be determined until actual uses have been planned, therefore, actual volume impact on the area is uncertain.

Schools

1. New Elementary school(s), Jr. High and High Schools would probably be required in the area. Locations and financing are the two major issues. Spreckels Union School District would be impacted.

Fire

1. A new fire station near Pine Canyon Road, or expansion of the Portola Drive Station of the Salinas Rural Fire District which would be impacted dependent upon ability to finance expansion.

Energy

1. Utilities would require extensive dependence on inefficient electricity unless natural gas is extended throughout the area.

2. Gasoline consumption would be great unless mass transit service is available and utilized.

3. Urbanization of the area would probably necessitate a solid waste transfer station.

ARCHAEOLOGICAL/HISTORICAL

1. Most of the area contains no archaeological sites. Approximately 50% of the area has been field surveyed. Another 15% is developed; about 1/3 remains to be field checked.

2. The Corey House and the Boronda (?) Adobe Homesite on Las Palmas constitute 2 historical resources. Old "Hilltown" might constitute another nearby resource as would be the Spreckels Plant. No research is available on other structures. The Grange Building, or its function, might qualify.

AGRICULTURAL LAND CONVERSION

1. Urbanization would convert 3,000-5,000 acres of rangeland, perhaps more due to adjacency and land use conflict.

2. About 250-500 acres of row crop land, or land with that potential, would be directly affected.

3. Another 300 acres along River Road between the road and river could be indirectly affected.

CONSISTENCY WITH ADOPTED GROWTH MANAGEMENT POLICIES

1. The area does not now have the infrastructure to support urbanization.

2. The urbanization of River Road does not have as high priority as development adjacent to existing cities and towns.

3. Consistent with Policy 3 - dependent upon being able to fulfill and plan for all necessary services.

CONFLICT WITH NEIGHBORING LAND USE

1. Not conducive to grazing nearby.

2. Not conducive to close proximity intensive agricultural practice.

3. Not amenable to odors generated by Spreckels.

4. Subject to Fort Ord helicopter overflights and Army transport use of River Road to Fort Hunter Liggett.

ADVERSE CUMULATIVE IMPACT

1. The addition and synergistic effect of traffic increases on Highway 68 due to growth in South Salinas, Monterey, Hidden Hills, Carmel Valley, etc.

2. Increasing need to solve sewage problems to protect our groundwater resources.

3. Protecting natural beauty and our tourist attractions which are progressively declining as development continues (potential benefit to prime agricultural land and open space if urbanization achieves clustering and reduces sprawl both in time and space).

4. Totality of all development stresses capability of local school systems.

5. Air pollution increases must be dealt with on areawide basis.

6. Urbanizing River Road puts a cumulative stress on drainage and flood control along the Salinas River.

7. Energy consumption.

GROWTH-INDUCING

1. Will push the homeowner who desires a rural setting further out along River Road where service is even more remote and impacts to the environment are even greater.

2. May change surrounding property values, assessments, and market situation.

SHORT-TERM vs. LONG-TERM BENEFITS

1. May alleviate short-term, the need for more, and perhaps less expensive housing at the long-term expense of overall planning effort needed to coordinate with growth in the other Toro Area localities.

2. Row crop land may be more important for the long-term than fulfilling a possibly short-term urbanization strategy for this area. Perhaps row crop land can continue in production if the whole Toro Area is planned as a unit.

IRREVERSIBLE COMMITMENT OF LAND OR IRRETRIEVABLE RESOURCES

1. Urbanizing River Road will require such a massive capital outlay from both government and citizens for services and improvements that such a plan amendment is irreversible except perhaps in the geologic scale of time.

EFFECTS FOUND NOT TO BE OF CONSEQUENCE AS A RESULT OF AN AMENDMENT TO URBANIZE RIVER ROAD ARE:

1. No existing resident will be displaced.

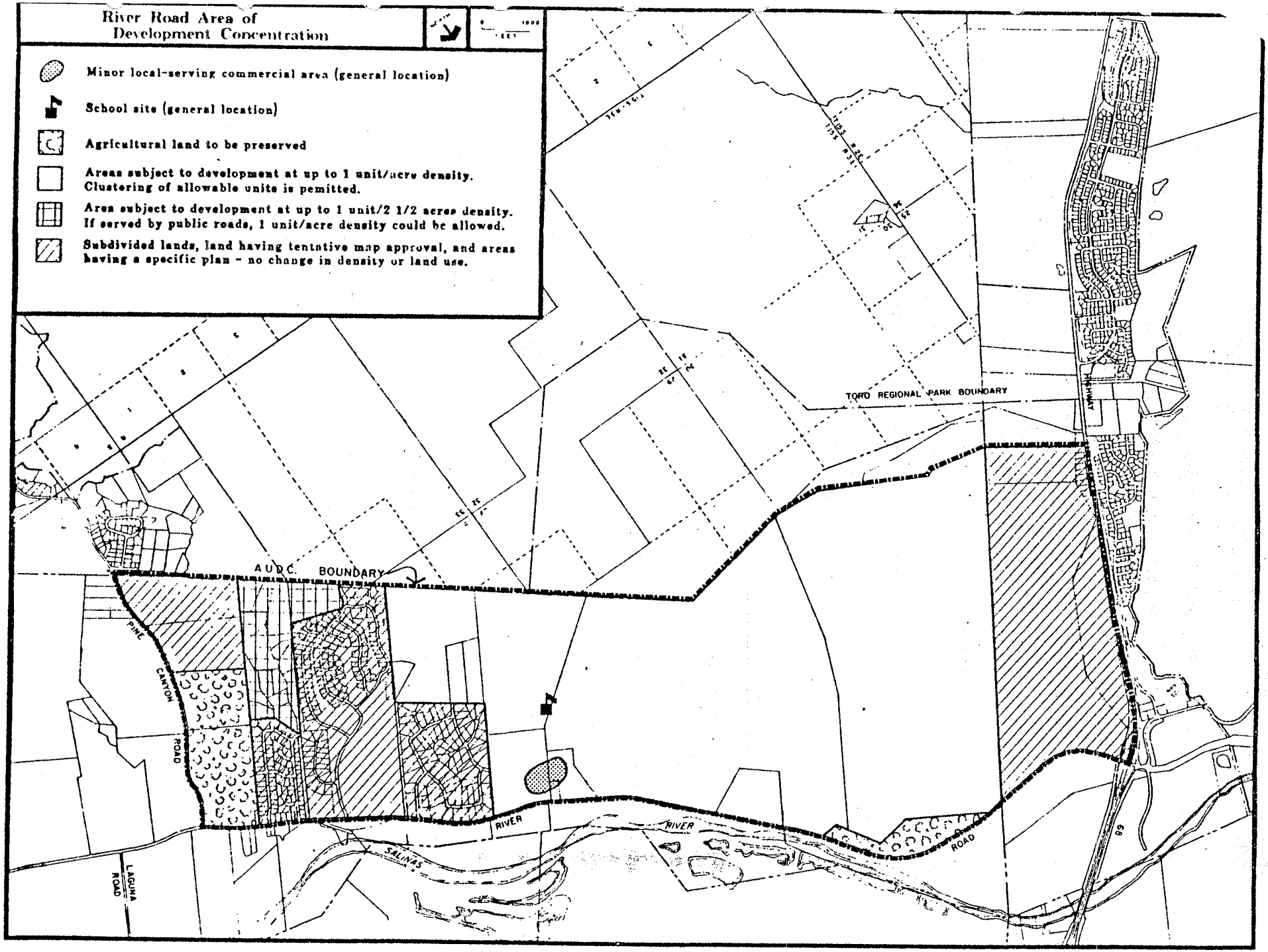
2. The need for new housing is not generated.

3. The project does not conflict with airport land use.

4. The project could save some prime land (but may not).

5. There is probably not the water supply problem here that exists in North Monterey County.

6. Several potential impacts could be mitigated, they are: loss of rare plants, historical sites, flood danger, erosion, and local circulation. The economic cost of reducing the environmental impacts is not known.


River Road Area of
Development Concentration
Minor local-serving commercial area (general location)
School site (general location)
Agricultural land to be preserved
Areas subject to development at up to 1 unit/acre density.
Clustering of allowable units is permitted.
Area subject to development at up to 1 unit/2 1/2 acres density.
If served by public roads, 1 unit/acre density could be allowed.
Subdivided lands, land having tentative map approval, and areas
having a specific plan - no change in density or land use.
TORO REGIONAL PARK BOUNDARY
A.U.D.C. BOUNDARY
PINE CANYON ROAD
RIVER
SALINAS RIVER
LAGUNA ROAD
ROAD
68
69

ENVIRONMENTAL RECOMMDATION AND INITIAL STUDY

MEETING: BOARD OF SUPERVISORS OF JANUARY 8, 1980

PROJECT: LAS PALMAS SPECIFIC PLAN FILE NO. PC-3934

APPLICATION TYPE: SPECIFIC PLAN

LOCATION: SOUTH SIDE OF RIVER ROAD SOUTH OF HIGHWAY 68 APPROXIMATELY 7 MILES SOUTHWEST OF SALINAS IN THE TORO AREA

PRESENT: RANCH PROPERTY OF 1577 ACRES ZONED; F-V-B-5, 40 ACRE MINIMUM; SC/1-E-V; K-V-E-B-A NOW WITH EXISTING RANCH BUILDINGS AND OPERATING ROW CROP AND CATTLE RANCH.

PROPOSED: 550 SINGLE FAMILY UNITS ON MINIMUM 10,400 SQ FOOT LOTS; 150 SINGLE FAMILY UNITS ON 1.0 ACRE MINIMUM LOTS; 878 MULTIPLE FAMILY UNITS; 10 ACRE SCHOOLSITE 40 AC SEWAGE TREATMENT PLANT; 713 ACRE OPENSPACE TO BE DESCRIBED BY SPECIFIC PLAN

PLAN: TORO AREA MASTER PLAN

PLAN DESIGNATION: RANGELAND/AGRICULTURAL

PROJECT CONSISTENCY STATUS* _____ CONSISTENT _____ INCONSISTENT

THE BOARD FOUND THAT THE IDEA OF SUCH RESIDENTIAL DEVELOPMENT WAS CONCEPTUALLY CONSISTENT WITH THE TORO AREA MASTER PLAN, OCTOBER 23, 1979. THE BOARD DIRECTED THE STAFF TO PROCEED WITH A SPECIFIC PLAN TO CONSIDER ALL LEGALLY REQUIRED FACETS OF THE DEVELOPMENT OF THIS PROPERTY.

SEE MAP (ATTACHED). ZONING SECTIONS 10-9H AND 10-10H

THE (STAFF) PLANNING COMMISSION OTHER _____ MAKES THE FOLLOWING ENVIRONMENTAL RECOMMENDATION: FROM AN INITIAL STUDY (SEE REVERSE)

IT HAS BEEN DETERMINED THAT THIS PROJECT [X] MAY, [ ] WILL NOT HAVE A SIGNIFICANT IMPACT(S) UPON THE ENVIRONMENT AND IT IS RECOMMENDED THAT A

_____ NEGATIVE DECLARATION, OR

_____ NEGATIVE DECLARATION WITH MITIGATION MEASURES (attached),

OR

__X__ ENVIRONMENTAL IMPACT REPORT (EIR), BE PREPARED.

PREPARER Lynnette Mounday TITLE Sr. Planner DATE January 2, 1980

IF YOU HAVE ANY QUESTIONS ABOUT THE MEANING OF THIS INFORMATION PLEASE CONTACT THE ENVIRONMENTAL SECTION OF THE COUNTY PLANNING DEPARTMENT PRIOR TO THE MEETING DATE AT THE TOP OF THIS PAGE BY CALLING 422-9018.

INITIAL STUDY

FILE NO. PC-3934

BASIC ENVIRONMENTAL QUESTIONS

SIGNIFICANT IMPACT	CAN BE MITIGATED	INSIGNIFICANT IMPACT	YES	NO		
X	X*		X		1.	Within a high seismic hazard zone? Zone: IV AND VI OF SEISMIC ELEM
				X	2.	Development on slopes over 30%?
X	X*		X		3.	Potential erosion problem? SOILS ARE ERODIBLE, DEVELOPMENT COULD
X	X*		X		4.	Evidence of geologic instability? ACCELERATE EROSION ↓ YES, SMALL LANDSLIDE AREAS
X	X*		X		5.	Soil constraints for development? SEE LAS PALMAS ENVIRONMENTA RESOURCES INVENTORY FIGS. II AND III
X	X*		X		6.	Potential to degrade surface water? Affected water(s) SALINAS RIVER
						a. Reduce water quality? from possible pollutant laden runoff
						b. Reduce downstream availability?
X	X*		X		7.	Potential to degrade groundwater? IF SEPTIC TANKS ARE USED ON
			X			a. Quality? 1 ACRE LOTS
				X		b. Increase overdraft?
X	X		X		8.	Would increased project runoff be detrimental? YES, IF SILTATION AN
X	X*		X		9.	Within a 100 year floodplain? POLLUTANTS ARE BY-PRODUCTS
X	X*		X		10.	Eliminate native vegetation? Type:
X	X*		X		11.	Rare or endangered species? Species: Delphinium hutchinsonae
X	X*		X		12.	Impact any unique or fragile biotic community? Oak woodland, Coastal scrub, grassland
X	X*		X		13.	Impact a wildlife use area? Type: forage / Range area
				X	14.	Designated scenic area?
X	X*		X		15.	Any significant visual impact? Will depend upon design and placemen
				X	16.	Obnoxious odors? of structures and view from River Road.
				X	17.	Unacceptable noise?
X	X*		X		18.	Traffic impact? River Road and Highway 68 and South Main Street in Salinas, possibly Reservation Road
				X	19.	Conflict with any airport land use plan or land use?
				X	20.	Project access inadequate?
X	X*		X		21.	Air quality degradation on a
						_____ temporary basis construction activity
						_____ permanent basis fireplaces, auto emissions
?	?			?	22.	Sewage disposal problem? These items cannot be precisely
?	?			?	23.	Water supply problem? examined without preparation and review
?	?			?	24.	Inadequate school facilities? District: of the Specific Plan
		X		X	25.	Increased fire hazard?
		X		X	26.	Inadequate access for fire trucks?
		X		X	27.	Extension of utilities 1/2 mile or more?
		X		X	28.	Inefficient use of energy?
		X		X	29.	Archaeological site?
X	X*		X		30.	Historical site? COREY HOUSE AND ESTRADA(?) ADOBE RUIN
		X		X	31.	Loss of prime row crop or irrigated farmland?
(X)			X		32.	Loss of grazing land? LAND IN THE RANGELAND/AGRICULTURAL AREA NO LONGER IS
		X		X	33.	Inconsistent with Growth Management Policies? THE LAS PALMAS SPECIFIC PLAN IS CONSISTENT WITH ITEM #3 (SEE BELOW) FOR THAT PURP
		X		X	34.	Conflicts with neighboring land use? ATTACHED TO ZONING MAP
		X		X	35.	Generates the need for new housing?
(X)			X		36.	Adverse cumulative effect? TRAFFIC, AIR POLLUTION, LOSS OF RANGELAND, LOSS OF OPEN SP
				X	37.	Displace existing residents?
(X)			X		38.	Is growth inducing? WILL FURTHER ENCOURAGE GROWTH ON RIVER ROAD, AND MAY PROVIDE SOME SERVICES TO IMPLEMENT THAT GROWTH
						TO BE ANSWERED FOR SPECIFIC OR GENERAL PLAN PROJECTS ONLY:
				X	39.	Short term benefits at expense of long-term benefits? HOUSING ① BENEFITS WOULD BE LONG-TERM, ECONOMIC GROWTH OF CONSTR
			X		40.	Irreversible commitment of land or irreplaceable resources? land COMMITTED FOR RESIDENTIAL WILL PERMANENTLY PRECLUDE RANCHING

① DUCTION INDUSTRY WOULD BE SHORTERM—

NOTES:

CIRCLED ITEMS HAVE NO FEASIBLE MITIGATION MEASURES

* Many items checked yes pose a potentially significant impact, however appropriate mitigation measures discussed in the EIR may reduce impacts to insignificant levels. The resolution of potentially significant impacts and the discussion in an EIR will also serve to provide the concerned public with information on this large scale project.

OPR and Growth Management
Checklist

Areas of Possible
Conflict:

X 1. Applicable Plan TORO AREA MASTER PLAN
(a) Plan Designation RURAL RESIDENTIAL EXPANSION & RANGELAND/AGRICULTURE
(b) Plan Density 1 UNIT/AC AND 3 ACRES/UNIT
(c) Is there any internal Plan inconsistency relative to the project? X Yes ____ No If "yes", give most restrictive Plan designation 5 AC/UNIT
(d) If no density is depicted on the Plan which covers the project site, give the appropriate designation and density from the OPR Extension Letter ____ 3-5 AC/UNIT FOR RANGELAND AGRICULTURE
Is project consistent with this designation ____ Yes X No NOT AS NOW PROPOSED HOWEVER IT IS THE PURPOSE OF A SPECIFIC PLAN TO RESOLVE THESE ISSUES

X 2. Does the proposed project conform to the County Low and Moderate Income Housing Ordinance? ____ Yes X No NO ORDINANCE YET ADOPTED

X 3. What is the project areas wildland fire hazard rating? HIGH AND MODERATE
Has applicant submitted "adequacy of access" report? ____ Yes X No

X 4. Does project include frontage on lakes, beaches, rivers, or streams inventoried in the Conservation/Open Space Element or other portions of the General Plan? ____ Yes X No If yes, has applicant delineated areas of existing and/or potential access to the resources? ____ Yes ____ No

X 5. Is the project located in close proximity to any of the following?
(a) highways and freeways ____ Yes X No
(b) primary arterials and major local streets X Yes ____ No
(c) passenger and freight railroad systems ____ Yes X No
(d) ground rapid transit systems ____ Yes X No
(e) airports ____ Yes X No
(f) industrial plants ____ Yes X No
(g) other ground stationary sources ____ Yes X No
If any of the above are checked "yes", indicate distance from noise source ABUTS RIVER ROAD AND THE CORNERS FROM FORT ORD PASS
If yes, has applicant submitted Community Noise Equivalent Level (CNEL) Contours ____ Yes X No OVERHEAD NEARBY

X 6. Is the project in close proximity to any of the following?
(a) schools X Yes ____ No WHEN CONSTRUCTED WOULD INCLUDE A SCHOOL WITHIN THE PROJECT
(b) hospitals ____ Yes X No
(c) resthomes ____ Yes X No
(d) long term medical or mental care facilities ____ Yes X No
(e) other noise sensitive areas? ____ Yes X No
if yes, specify ____
If any of the above are checked "yes", indicated distance to project site WITHIN PROJECT SITE
If any of the above are checked "yes", has applicant submitted results of on-site noise monitoring ____ Yes X No NOT APPLICABLE AT THIS TIME - SHOULD FOLLOW STATE STANDARDS

X 7. Is the proposed project any of the following?
(a) school X Yes ____ No
(b) hospital ____ Yes X No
(c) resthome ____ Yes X No
(d) long term medical or dental care facility ____ Yes X No
(e) other noise sensitive use ____ Yes X No
if yes, specify ____
If any of the above are checked "yes", has applicant submitted results of on-site noise monitoring? ____ Yes ____ No

X 8. Is the proposed use in compliance with State Office of Noise Control Guidelines (1/1/76)? ____ Yes X No

____ 9. A review of the project with regard to the Growth Management Amendment to the General Plan indicates that: CONSISTENT WITH ITEM #3 OF THE GROWTH MANAGEMENT AMENDMENT TO THE GENERAL PLAN AS ADOPTED OCTOBER 9, 1979 ATTACHED ON ZONING MAP

11/19/79

ENVIRONMENTAL RECOMMENDATION AND INITIAL STUDY

MEETING: BD. OF SUPERVISORS OF _____

PROJECT: RIVER ROAD AREA FILE NO. _____

APPLICATION TYPE: GENERAL PLAN AMENDMENT

LOCATION: DEVELOPING AREA FROM HIGHWAY 68 SOUTHEAST ALONG RIVER RD TO PINE CANYON ROAD

PRESENT: PLAN NOW DESIGNATES THE AREA AS "RURAL RESIDENTIA EXPANSION", "COMMERCIAL", "AGRICULTURAL", RANGELAND/AGRICU

PROPOSED: "AREA OF URBAN CONCENTRATION"

PLAN: TORO AREA MASTER PLAN

PLAN DESIGNATION: AS ABOVE

PROJECT CONSISTENCY STATUS: _____ CONSISTENT _____ INCONSISTENT

→ NOT APPLICABLE

NOTES: 1) THE AREA DESCRIBED IN THE ATTACHED MAP VARIES IN ELEVATION TOPOGRAPHY AND PHYSICAL CHARACTERISTICS, IMPACTS VARY AREA BY AREA.

2) CONVERTING LOW DENSITY RURAL RESIDENTIAL, AGRICULTURAL, AND RANGELAND TO URBAN CONCENTRATIONS IMPLIES SIGNIFICANT CHANGES TO THE ENVIRONMENT IN TERMS OF OPEN SPACE LOST, CHANGE OF CHARACTER, INCREASE IN TRAFFIC TRAFFIC ACCIDENTS AND AIR POLLUTION, ENERGY USE

3) PUBLIC SERVICE INCREASES AND INCREASES DUE TO INCREASED POPULATION DENSITY HEALTH SIDES REQUIREMENTS AND INCREASING FEDERAL SIDES FOR CLEAN WATER AND CLEAN AIR MEAN THAT PROVIDING ADEQUATE SCHOOLS, ROADS, SEWERS, WATER DISTRIBUTION, HEALTH CARE POLICE SERVICE PUBLIC LIBRARY AND EMERGENCY SERVICES ALL THESE WARRANT DISCUSSION

SECTION 908 OF CEQA GUIDELINES IS ATTACHED TO THIS STUDY FORM.

4) NO SEPARATE EIR SHALL BE PREPARED FOR THIS PROPOSAL, HOWEVER PURSUANT TO CEQA GUIDELINES SECTION 908 THE FUNCTIONAL EQUIVALENT OF AN EIR WILL BE INCLUDED BY STAFF IN THE TEXT OF THE STUDY, GOALS AND POLICY STATEMENTS THAT ILLUSTRATE AND REPORT ON THIS PROPOSAL

THE (STAFF) PLANNING COMMISSION OTHER _____ MAKES

THE FOLLOWING ENVIRONMENTAL RECOMMENDATION: FROM AN INITIAL STUDY (SEE REVERSE)

IT HAS BEEN DETERMINED THAT THIS PROJECT ☒ MAY, ☐ WILL NOT HAVE A

SIGNIFICANT IMPACT(S) UPON THE ENVIRONMENT AND IT IS RECOMMENDED THAT A

_____ NEGATIVE DECLARATION, OR

_____ NEGATIVE DECLARATION WITH MITIGATION MEASURES (attached),

OR

↘ ENVIRONMENTAL IMPACT REPORT (EIR), BE PREPARED AS PART OF SEE CEQA SECTION 908. THE AMENDMENT.

PREPARER LYNNE H. MOUNDAY TITLE SR. PLANNER DATE 11-13-80

IF YOU HAVE ANY QUESTIONS ABOUT THE MEANING OF THIS INFORMATION PLEASE CONTACT THE ENVIRONMENTAL SECTION OF THE COUNTY PLANNING DEPARTMENT PRIOR TO THE MEETING DATE AT THE TOP OF THIS PAGE BY CALLING 422-9018.

INITIAL STUDY

FILE NO. _____

SIGNIFICANT IMPACT	CAN BE MITIGATED	INSIGNIFICANT IMPACT	YES	NO	BASIC ENVIRONMENTAL QUESTIONS
X			X		1. Within a high seismic hazard zone? Zone: ZONES II THRU VI
X			X		2. Development on slopes over 30%?
X			X		3. Potential erosion problem?
X			X		4. Evidence of geologic instability? SALINAS RIVER BANKS, ERODED BLUFFS, LANDSLIDES
X			X		5. Soil constraints for development? HIGH GROUND WATER, STEEP SLOPES CLAY-EXPANSIVE SOILS, HIGH PERC RATES SOILS SUBJECT TO INUNDATION.
X			X		6. Potential to degrade surface water? Affected water(s)
X	X		X		(a.) Reduce water quality? RUNOFF SILTATION, PETROLEUM, PESTICIDE b. Reduce downstream availability? AND HOUSEHOLD CHEMICAL RESIDUES
					7. Potential to degrade groundwater? IF SEPTIC TANKS, NO IF ADEQUATE a. Quality? SEWERS AND TREATMENT OF EFFLUENT b. Increase overdraft? NO.
X			X		8. Would increased project runoff be detrimental? YES, UNLESS EROSION IS CONTROLLED
X			X		9. Within a 100 year floodplain? PARTIALLY
X			X		10. Eliminate native vegetation? Type: GRASSLAND, OAK WOODLAND CHAMISE/COYOTE BRUSH CHAPARRAL, RIPARIAN
X			X		11. Rare or endangered species? Species:
X			X		12. Impact any unique or fragile biotic community? RIPARIAN ALONG SALINAS RIVER - ECOSYSTEM ALTERED BY RUNOFF DEVELOPMENT
X			X		13. Impact a wildlife use area? Type: REALIGNMENT
X			X		14. Designated scenic area? ALONG HWY 68 AT TORO VISTA
X			X		15. Any significant visual impact? TIGHTLY DEVELOPED UNITS SUCH AS
X			X		16. Obnoxious odors? INDIAN SPRINGS ARE POTENTIALLY UNKNOWN
X			X		17. Unacceptable noise?
X			X		18. Traffic impact?
		X		X	19. Conflict with any airport land use plan or land use?
X	X		X		20. Project access inadequate? UNDER THIS CONCEPT WIDENING, ADDITIONAL LANES WIDER SHOULDERS, POCKETS, AND TRAFFIC CONTRO
X			X		21. Air quality degradation on a COULD EVENTUALLY BE IMPACTED _____ temporary basis _____ permanent basis
X			X		22. Sewage disposal problem? DENSITY REQUIRES A TREATMENT PLANT TIE
		X		X	23. Water supply problem? IMPLEMENTATION IS NOT POLITICALLY OR ECONOMI
X			X		24. Inadequate school facilities? District: EASY TO ACHIEVE
		X	X		25. Increased fire hazard? COMMERCIAL PERHAPS INDUSTRIAL FLOW REQ
X			X		26. Inadequate access for fire trucks?
X			X		27. Extension of utilities 1/2 mile or more? NATURAL GAS CABLE TV
X			X		28. Inefficient use of energy? COMMUTING, HAULING SUPPLIES IF ON A
X			X		29. Archaeological site? UNLESS COMPLETE AREAWIDE SURVEY SHOWS
X			X		30. Historical site? (OTHER USE) ADOBE ON LAS PALMAS
X			X		31. Loss of prime row crop or irrigated farmland? AT PINE CANYON RD AND RIVER ROAD AND ALONG THE LAS PALMAS RIVER ROAD FRONTAGE AND
X			X		32. Loss of grazing land? IN HIGHER ELEVATIONS) BETWEEN THE RIVER AND RIVER R
X			X		33. Inconsistent with Growth Management Policies? SERVICES DO NOT NOW EXIST AT THE URBAN LEVEL AND IT IS NOT WITHIN THE SPHERE OF INFLU
X			X		34. Conflicts with neighboring land use? OF SALINAS
		X		X	35. Generates the need for new housing? -> COULD CONFLICT WITH AGRICULTURE AND INDUSTRY AT SOME POINT
X			X		36. Adverse cumulative effect? HWY 68, SCHOOLS, SEWAGE, PIPE SERVICE
		X		X	37. Displace existing residents?
X			X		38. Is growth inducing? DENSITY WOULD INCREASE - PRESSURE FOR RURAL PROPERTIES WOULD EXTEND FURTHER OUT
					TO BE ANSWERED FOR SPECIFIC OR GENERAL PLAN PROJECTS ONLY: RIVER RON
X			X		39. Short term benefits at expense of long-term benefits?
X			X		40. Irreversible commitment of land or irreplaceable resources? MASSIVE ECONOMIC COMMITMENT FORECLOSES POSSIBILITY OF EASY RECONVERSION TO GRAZING LAND

NOTES:

APPENDIX B

Comments Received: EIR 80-100 Las Palms Ranch Specific Plan
EIR 81-113 River Road Area of Development Concentration

1.	Monterey County Sheriff's Office	Received 9/10/82
2.	Monterey County Public Works Department	Received 9/17/82
3.	Monterey County Health Department	Received 9/22/82
4.	California Regional Water Quality Control Board	Received 9/23/82
5.	Monterey-Salinas Transit	Received 9/29/82
6.	State Clearinghouse (for Environmental Review)	Received 10/4/82
	Enclosure #1 - California Dept. of Fish & Game	
	Enclosure #2 - (Same as Letter #4)	
7.	Letter from Sharon C. Heller, Area Resident	Received 10/4/82
8.	Letter from Clara Sargenti, Area Resident	Received 10/5/82
9.	Second Letter from State Clearinghouse	Received 10/11/82
	Enclosure #1 - California Dept. of Transportion	

Memorandum • SHERIFF'S OFFICE
MONTEREY COUNTY

TO : Lynne H. Mounday, Planning Department DATE: September 8, 1982

FROM : D. B. Cook, Sheriff, by Esther Crespo, Crime Prevention Unit

SUBJECT: EIR 80-100 River Road Area of Development Concentration

We request that you add the following information to that presently shown in the draft EIR presented to our offices for recommendations.

IMPACT CONCERNS:

The cumulative impact of increase in calls for services resulting from development of the several projects in the River Road and Highway 68 areas will have a SIGNIFICANT impact on Sheriff's Department services in spite of the fact that this area is presently considered a low crime area.

Statistics show that approximately 3 of every 100 residents will require police services at any given time, as victims of a felony. 7 out of each 100 residents will require police services for a variety of needs. Demands at full development of other Sheriff's services (Corrections, Civil, Records and Coroner-Public Administrator functions) will also increase as a direct result of population growth.

Response time to the River Road and Highway 68 development sites will be strongly affected by the increase in traffic levels. Appropriate planning should also be incorporated to ensure timely and safe response to emergency situations.

MEASURES FOR CONSIDERATION:

Projected commercial park: Design and construction of the commercial footage is of extreme importance not only to the prevention of crimes at these locations, but to orderly and efficient response to emergency situations and alarm activations in commercial parks.

Plans must incorporate specific guidelines for appropriate use of physical security hardware. Doors, particularly with glass within 40 inches, MUST be equipped with DOUBLE cylinder deadbolts to preclude breaking of glass and easy entry. Secondary and service doors will require a similar locking mechanism to preclude defeating the out of the way points of egress and becoming the main targets for burglary.

Layout of the commercial square footage must allow for complete access to sites by patrol units in the interest of effectiveness, safety and performance.

Residential development: Adherence to crime prevention suggestions and design measures must be effected to assist in preventive program approaches in effect countywide:

Cul-de-sacs: Street design including cul-de-sacs must provide optimum emergency service access and turning capabilities. Cul-de-sacs, ideally, should be no longer than 800 ft.

Numbering systems: Plans for development should incorporate overall uniformity in design for clockwise, consistent numbering of homes that will not be affected by construction in phases. House numbers should be 4 inches in size, light on dark background or vice versa.

Street Names: Special care must be taken to preclude repetition of street names within the unincorporated area and the extensive use of one street nomenclature diversified by using Place, Court, Drive, Way, etc., is discouraged. Street nomenclatures should be clearly posted and be readily visible to headlight illumination.

Shrubbery-Landscaping: Shrubbery and landscaping directly surrounding the residential structure should not obstruct windows and main entrances. Houses built on split level or two-story plan should not have large trees within range to provide access to second story windows or roof.

Windows and sliding glass doors: These entry points should be equipped with auxiliary locking devices AT THE TIME OF CONSTRUCTION that will preclude illegal entry by lifting and/or prying.

Entry doors: Main door and door from garage into home should be of solid core construction and have a one-inch deadbolt as a locking device. If glass is within 40 inches of these doors, the one-inch deadbolt lock should be a double cylinder deadbolt.

Alarm systems: The Sheriff's Department does not discourage the installation or use of alarm systems. There is, however, an ordinance in effect for the regulation of false alarms. An application must be filed with the Sheriff prior to installation of a new system and the regulatory guidelines followed.

Recommendations are provided for reduction of residents' vulnerability to crime and to enhance residential security while simultaneously facilitating patrol functions.

Sheriff's Department personnel will not be increased as a direct result of development of the River Road Area plan. It will affect the cumulative impact on services and overall growth may require Board action authorizing additional personnel.

Very truly yours,

D. B. "Bud" Cook
Sheriff-Marshal-Coroner-Public Administrator

/ecc

Memorandum

DEPARTMENT OF PUBLIC WORKS
COUNTY OF MONTEREY

TO : Public Service

DATE: September 16, 1982

FROM : Traffic

SUBJECT: RIVER ROAD AREA OF DEVELOPMENT CONCENTRATION - DRAFT EIR

2.7 TRAFFIC

Page 64 - Setting - The report incorrectly implies that our department established the volume of 900 vehicles per hour for level of service C. The remainder of the sentence after "capacity for a two lane highway" can be omitted.

The 1980 volume on Highway 68 was 16,800 vehicles per day. The 1981 volume was 16,700 vehicles per day.

Page 66 - Funding for a Toro Park interchange has been included in the State Transportation Improvement Program.

Volumes on local roads should be compared to service volumes for Level of Service C, not to capacity volumes.

IMPACTS

Page 67 - Our review of the Las Palmas Ranch Traffic Study recommended that a traffic generation rate of 8.0 trips per day per unit be used for single family dwelling units. Experience suggests no change. The traffic estimates of this draft are therefore somewhat low and are discussed on page 73.

Page 70 - The report compares projected traffic volumes to roadway capacities for River Road and for the four lane section of Highway 68. Projected volumes should be compared to service volumes for Level of Service C to determine if level C will be maintained. Furthermore, regardless of whether or not level C can be maintained on Highway 68 east of River Road, this has no bearing on whether improvements would be required on the two lane portion west of River Road. The report is incomplete.

The level of service analysis is inadequate for the impacts based on the Existing Policy Plan. The service volume for level of service C on River Road should be estimated to determine if roadway improvements are needed (employment of the Existing Policy Plan may require four lanes for level of service C). Furthermore, the report presents no basis to indicate that ramp levels of service would improve by one level.

Page 73 - In responding to our department's second concern (dated October 28, 1981) the report states, ". . . Level of Service C is attained in very few urban settings . . .", and "Level of Service D for a freeway on-ramp during short periods is not unusual in an urban setting . . .". Our department has serious concerns regarding these responses. First, neither Highway 68 nor River Road meet the definition of urban arterials and therefore must be analyzed as rural roads. Second, urban and rural roads are evaluated be different sets of standards. Third, the Monterey County Transportation Plan's goal of level of service C applies to all area roads.

MITIGATION MEASURES

1.a & b. - The limits of the four lane section, being based on projected traffic volumes and levels of service, should be more closely examined.

Memorandum •

DEPARTMENT OF PUBLIC WORKS
COUNTY OF MONTEREY

) : Planning Department, ATTN: Lynne Mounday DATE: September 17, 1982

.OM : Public Service

BJECT: DRAFT EIR's

1. River Road Area of Development Concentration
2. Markham Ranch Subdivision

Attached are our comments on the two subject drafts.

RPW/emd
Attachments

Memorandum

HEALTH DEPARTMENT
MONTEREY COUNTY

TO : Lynne Mounday, Planning Department

DATE: 9/21/82

FROM : Al Friedrich, Environmental Health

SUBJECT: D.E.I.R. for the River Road Area of Development Concentration

Our office has reviewed the above D.E.I.R. and assuming that sewage disposal is by treatment plant and not septic system, we can offer the following comments in regard to the Las Palmas Proposal:

1. Dual or backup treatment facilities should be constructed for emergency and/or maintenance purposes.

2. Standby power be provided on site in case of electrical failure.

3. Construction of waste storage ponds (lined) with 120 day minimum storage capacity.

4. Spray irrigation be limited to slopes of less than 10 percent to avoid potential erosion.

5. Natural and manmade watercourses be protected from spray irrigation contamination.

6. Construction of an emergency raw sewage storage pond (lined) with a 48 hour storage capacity.

7. Monitoring well on site be dug to detect any sewage contamination in water supply wells.

8. A minimum of one acre for 10,000 gallons of spray.

9. Spray irrigation be conducted on only two thirds of the open space or common area available at any one time to allow a resting period for a portion of the open space.

10. A minimum of one-half acre set aside for each 10,000 gallons sprayed so rotation of sprayfields can be accomplished.

1.d. - Left turn channelization at the Highway 68 on-ramps (not off-ramps), may be beneficial. However, have the geometrics been reviewed to determine what work will be required to make them fit.

2.a. - Level of service analysis must be made based on this premise to determine what improvements would be required.

3. - These cannot be considered mitigation of this project unless the developers of the project (or at least entities other than the general public) propose to construct these improvements.

4. - The County does not construct State highways. The Cities of Monterey and Del Rey Oaks are also involved. The first sentence represents a true mitigating measure for this project and should be given serious consideration.

BH/cw

11. The minimum level of treatment should be secondary treatment for open spaces not accessible to the public and secondary treatment with coagulation, sedimentation and filtration plus chlorination for areas which are open to the public (e.g. golf courses).

Al Friedrich R.S.
Senior Sanitarian

State of California The Resources Agency of California

Memorandum

To : State Clearinghouse
Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Date: September 21, 1982

From : **California Regional Water Quality Control Board**
Central Coast Region—1122 Laurel Lane 1102-A LAUREL LANE
San Luis Obispo, California 93401

Subject: DEIR - RIVER ROAD AREA OF DEVELOPMENT CONCENTRATION (ADC), SCH 81081111

The DEIR discusses general development possibilities in the ADC located immediately south of the Salinas River near its intersection with Highway 68. The ADC covers a total of 2,539 acres. Some of the areas are presently being developed (e.g., Indian Springs, Pedrazzi, and Vista del Rio subdivisions). The largest undeveloped area in the ADC, and most specifically addressed in this DEIR, is the Las Palmas Ranch, which covers 1523 acres. For Las Palmas Ranch, 1578 units are proposed. A community sewerage system, including pond treatment and disposal by irrigation, is proposed for the as yet undeveloped areas of the ADC.

Our primary concerns relate to wastewater disposal and erosion control. The basic concept of the sewage treatment and disposal system outlined in the DEIR appears to be feasible. The DEIR gives no specific details on the system, which would have to be submitted to the Regional Board. Approval of the sewage system would have to be granted by the Regional Board in the form of Waste Discharge Requirements prior to any development. Such requirements could be considered only after details of the collection, treatment, and disposal systems had been submitted along with a completed Report of Waste Discharge. Details required would include: lay out and schematics; hydrologic and geologic information; engineering and technical data; reclamation specifics (i.e., crops, suitable application rates, irrigation practices, winter storage, etc.); and operational procedures. We agree with the DEIR that a project of this magnitude will require formation of a public entity to operate and maintain the sewage collection, treatment, and disposal facilities. We also agree that flood protection would be required for the treatment facilities. Disposal area flood protection would not be required if adequate winter storage were provided.

The DEIR discusses two other sewage handling alternatives: expansion of and connection to the Salinas Utility Services system, and connection to the Monterey Regional Water Pollution Control Agency system. Due to a history and variety of problems plaguing the Salinas Utility Services system, we agree with the DEIR that it is "unlikely" to be a suitable alternative. Any such expansion would have to address the details listed above. The "Regional" wastewater treatment plant remains a possibility, but Clean Water Grant funds presently do not exist for near future

construction of the plant. "Hopes" for completion of the "Regional" plant by mid-1980's, as mentioned in the DEIR, are very dim at this time.

The DEIR mentions the possibility of iron and manganese removal from supply water. Disposal of wastes from such a system will require Regional Board staff review and may require consideration of Waste Discharge Requirements by the Regional Board.

Drainage and erosion controls are a concern with concentrated development of the magnitude outlined in the DEIR. We agree with the DEIR that grading and erosion control plans would have to be prepared and implemented in accordance with appropriate County Ordinances.

for KENNETH R. JONES
Executive Officer

EJG:emt

cc: AMBAG
Monterey County Planning Department
Monterey County Health Department
Monterey County LAFCO

Monterey-Salinas Transit

80-150 River Road

September 27, 1982

Mr. L. H. Mounday, Senior Planner
Monterey County Planning Department
Post Office Box 1208
Salinas, California 93902

Dear Mr. Mounday:

Enclosed are comments on Draft EIR's sent to Monterey-Salinas Transit:

1. Laguna Seca Office Park EIR 80-109
2. Markham Ranch Subdivision EIR 81-114
3. River Road ADC EIR 80-100

Thank you for the opportunity to comment.

Sincerely,

William P Bernier

William P. Bernier
Transit Planner

WPB:bhc
Enclosure

cc: AMBAG A-95 Review

ONE RYAN RANCH ROAD, MONTEREY, CALIFORNIA 93940, (408) 899-2558 / 424-7695

Comments on Draft EIR for River Road ADC
(EIR 80-100)

As development continues along River Road, the County should require construction and maintenance of a Park-and-Ride, Kiss-and-Ride facility at the intersetion of Highway 68. This facility would assist ride sharing and transit usage.

State of California
GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

EDMUND G. BROWN JR.
GOVERNOR

(916/445-0613)

October 1, 1982

Mr. Lynne H. Mounday
Monterey County Planning
Department
240 Church Street, P. O. Box 1208
Salinas, CA 93902

SUBJECT: SCH# 81081111 RIVER ROAD AREA OF DEVELOPMENT CONCENTRATION, LAS PALMAS

Dear Mr. Mounday,

State agencies have commented on your draft environmental impact report (EIR). If you would like to discuss their recommendations and concerns, contact the staff noted in the comments. The following is in summary:

DEPARTMENT OF FISH AND GAME

The department concurs with the recommendation on Page 56 for managing open space. The mitigations concerning the protection of mature valley oaks should be reviewed and approved by experts in range ecology and implemented concurrently with the first phase of development.

SAN LUIS OBISPO WATER QUALITY CONTROL BOARD

The Board's primary concern relates to wastewater disposal and erosion control. The draft EIR gives no specific details on the system, which would have to be submitted to the Regional Board. Approval of the sewage system would have to be granted by the Regional Board in the form of Waste Discharge Requirements prior to any development. Such requirements could be considered only after details of the collection, treatment, and disposal systems had been submitted along with a completed Report of Waste Discharge.

State Clearinghouse

When preparing the final EIR, you must include all comments and responses (CEQA Guidelines, Section 15146). The certified EIR must be considered in the decision-making process for the project. In addition, we urge you to respond directly to the agencies' comments by writing to them, including the State Clearinghouse number on all correspondence.

A 1981 Appellate Court decision in Cleary v. County of Stanislaus (118 Cal.App.3d 348) clarified requirements for responding to review comments. Specifically, the court indicated that comments must be addressed in detail, giving reasons why the specific comments and suggestions were not accepted.

The responses should indicate any factors of overriding significance which required the suggestions or comments to be rejected. Responses to comments must not be conclusory statements but must be supported by empirical or experimental data, scientific authority or explanatory information. The court further said that the responses must be a good faith, reasoned analysis.

Section 15002 (f) of the CEQA Guidelines requires that a governmental agency take certain actions if an EIR shows substantial adverse environmental impacts could result from a project. These actions include changing the project, imposing conditions on the project, adopting plans or ordinances to avoid the problem, selecting an alternative to the project, or disapproving the project. In the event that the project is approved without adequate mitigation of significant effects, the lead agency must make written findings for each significant effect (Section 15088) and it must support its actions with a written statement of overriding considerations for each unmitigated significant effect (Section 15089).

If the project requires discretionary approval from any state agency, the Notice of Determination must be filed with the Secretary for Resources, as well as with the County Clerk.

Please contact Anna Polvos at (916) 445-0613 if you have any questions.

Sincerely,

Charles E. Brandes
Deputy Director
Projects Coordination

Anna Polvos
State Clearinghouse

CEB/ap
attachments

cc: Resources Agency

State of California

The Resources Agency

Memorandum

To : 1. Jim Burns, Projects Coordinator
Resources Agency

2. Monterey County Planning Department
P. O. Box 1208
Salinas, CA 93902

Date : September 16, 1982

RECEIVED
SEP 27 1982
State Clearinghouse

From : **Department of Fish and Game**

Subject: Draft EIR, River Road Area of Development Concentration, Monterey County; SCH 81081111

Department of Fish and Game personnel have reviewed the subject document and find it generally describes project impacts on fish and wildlife. We concur with the recommendation on Page 56 for managing open space (including special attention to the protection of mature valley oaks). These mitigation measures should be reviewed and approved by experts in range ecology and implemented concurrently with the first phase of development.

Department of Fish and Game personnel are available to discuss our concerns in more detail. To arrange a meeting, contact Mr. Bruce Elliott, Wildlife Biologist, Department of Fish and Game, 2201 Garden Road, Monterey, CA 93940, telephone (408) 649-2890.

E C Fullerton
Director

State of California

ne Resources Agency of California

Memorandum

To : State Clearinghouse
Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Date: September 21, 1982

RECEIVED
SEP 24 1982
State Clearinghouse

From : **California Regional Water Quality Control Board**
Central Coast Region—1122 Laurel Lane 1102-A LAUREL LANE
San Luis Obispo, California 93401

Subject: DEIR - RIVER ROAD AREA OF DEVELOPMENT CONCENTRATION (ADC), SCH 81081111

The DEIR discusses general development possibilities in the ADC located immediately south of the Salinas River near its intersection with Highway 68. The ADC covers a total of 2,539 acres. Some of the areas are presently being developed (e.g., Indian Springs, Pedrazzi, and Vista del Rio subdivisions). The largest undeveloped area in the ADC, and most specifically addressed in this DEIR, is the Las Palmas Ranch, which covers 1523 acres. For Las Palmas Ranch, 1578 units are proposed. A community sewerage system, including pond treatment and disposal by irrigation, is proposed for the as yet undeveloped areas of the ADC.

Our primary concerns relate to wastewater disposal and erosion control. The basic concept of the sewage treatment and disposal system outlined in the DEIR appears to be feasible. The DEIR gives no specific details on the system, which would have to be submitted to the Regional Board. Approval of the sewage system would have to be granted by the Regional Board in the form of Waste Discharge Requirements prior to any development. Such requirements could be considered only after details of the collection, treatment, and disposal systems had been submitted along with a completed Report of Waste Discharge. Details required would include: lay out and schematics; hydrologic and geologic information; engineering and technical data; reclamation specifics (i.e., crops, suitable application rates, irrigation practices, winter storage, etc.); and operational procedures. We agree with the DEIR that a project of this magnitude will require formation of a public entity to operate and maintain the sewage collection, treatment, and disposal facilities. We also agree that flood protection would be required for the treatment facilities. Disposal area flood protection would not be required if adequate winter storage were provided.

The DEIR discusses two other sewage handling alternatives: expansion of and connection to the Salinas Utility Services system, and connection to the Monterey Regional Water Pollution Control Agency system. Due to a history and variety of problems plaguing the Salinas Utility Services system, we agree with the DEIR that it is "unlikely" to be a suitable alternative. Any such expansion would have to address the details listed above. The "Regional" wastewater treatment plant remains a possibility, but Clean Water Grant funds presently do not exist for near future

construction of the plant. "Hopes" for completion of the "Regional" plant by mid-1980's, as mentioned in the DEIR, are very dim at this time.

The DEIR mentions the possibility of iron and manganese removal from supply water. Disposal of wastes from such a system will require Regional Board staff review and may require consideration of Waste Discharge Requirements by the Regional Board.

Drainage and erosion controls are a concern with concentrated development of the magnitude outlined in the DEIR. We agree with the DEIR that grading and erosion control plans would have to be prepared and implemented in accordance with appropriate County Ordinances.

KENNETH R. JONES
Executive Officer

EJG:emt

cc: AMBAG
Monterey County Planning Department
Monterey County Health Department
Monterey County LAFCO

Oct. 1. 1982

To: Monterey County Planning Dept.

From: Sharon C. Heller

Regarding: Draft Environmental Impact Report for the River Road Area of Development Concentration

For the purposes of this document, the proposed ADC with two alternative specific plans for Las Palmas Ranch, the information, in my opinion, is poorly segregated.

Particularly, the "impact" sections of the proposed Las Palmas Specific Plan based on the existing General Plan policies and the "Areas of Development Concentration" should be more clearly isolated for reader comprehension.

Understandably, a 3 in 1 package has built-in confusions, but citizens of the River Road Area should be able to clearly differentiate data provided in the E.I.R.

Sincerely,

Sharon C. Heller

Sharon C. Heller
22540 Murietta Road
Salinas, CA 93908

Oct. 1, 19[illegible]
1000 River Road
Salinas, Calif. 93908

Lynne Mounday
Senior Planner
Mo. County Planning Dept.

Subject: Draft Environmental Impact Report for the River Road Area of Development Concentration, EIR 80-100.

Dear Sir:

It appears to me that the Draft Report is limited to the Los Palmas project. I believe that there should be further discussion on the needs of the entire River Road area.

A specific point I'd like to address is the anticipated water use. Will not the water to the Castroville area be intercepted?

Yours truly,
Clara Sargenti

State of California
GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

EDMUND G. BROWN JR.
GOVERNOR

October 7, 1982

Mr. Lynne Mounday
Monterey County Planning Dept.
P.O. Box 1208
Salinas, CA 93902

SUBJECT: SCH# 81081111 River Road Area of Development Concentration, Las Palmas

Dear Mr. Mounday:

The enclosed comments on your draft environmental documents were received by the State Clearinghouse after the end of the state review period. We are forwarding these comments to you because they provide information or raise issues which you should address in the final environmental documents.

We have explained to the departments preparing late comments that according to a recent Appellate Court decision, Cleary v. County of Stanislaus, you need not respond to these comments in the final document. However, to ensure the adequacy of the final document and compliance with the intent of CEQA, you should attempt to incorporate these additional comments into the preparation of your final environmental document.

Sincerely,

Anna Fellows

Charles E. Brandes
Deputy Director for Projects Coordination

enclosures

cc: Ken Fellows, DWR
Gary Ruggerone, Caltrans

STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY EDMUND G. BROWN JR., Governor

DEPARTMENT OF TRANSPORTATION
P.O. BOX L, SAN LUIS OBISPO 93406
TELEPHONE: (805) 549-3111

October 4, 1982

A-95/CEQA Review
SCH 81081111

Ron Bass
Executive Officer
State Clearinghouse
1400 10th Street
Sacramento, CA 95814

Gentlemen:

Caltrans District 5 review of the DEIR for the River Road Areas of Development Concentration, EIR 800-100 has generated the following comments:

1. Section 2.7 Traffic should have a discussion of the strategies of Transportation Systems Management including impacts of development on the Monterey-Salinas Transit line that serves Hwy 68, and any necessary mitigation such as ridesharing and park and ride lot locations.

2. Mitigation measures on page 74 should add:

   1.(e) Improvement of ramps at Route 68 and River Road will be required to accomodate peak hour traffic volumes resulting from the proposals. (see page 70 for reasons these improvements are required.)

It should be mentioned that where improvements to Highway 68 are required an Encroachment Permit must be obtained from Caltrans before work can be done within State right of way. The party requesting the Permit will be required to provide an environmental evaluation of the area within State right of way. A Cultural Resources Survey, Biological Survey, and any other pertinent evaluation, ie Floodplain, Wetland, etc., must be completed and accompany the Encroachment Permit Application.

Sincerely,

for by J. A. Mullis
Gary Ruggerone
District A-95 Coordinator

DEC 6 1982

REPORT TO MONTEREY COUNTY BOARD OF SUPERVISORS

SUBJECT	BOARD MEETING DATE	AGENDA NUMBER
CERTIFICATION OF EIR 80-100, PC3934 LAS PALMAS RANCH SPECIFIC PLAN, EIR 81-111 RIVER ROAD AREA OF DEVELOPMENT CONCENTRATION GENERAL PLAN AMENDMENT PC4231 RIVER ROAD AREA, DISTRICTS 3 and 5	12/7/82	#22A
DEPARTMENT: PLANNING		

RECOMMENDATION

Certify as final EIRs, EIR80-100 and EIR 81-111 bound as 1 document, with changes to be made as noted on the attachment.

JUSTIFICATION

1) Your board ordered preparation of the Las Palmas Ranch specific plan EIR 80-100 on January 8, 1980. On July 21, 1981 your board ordered preparation of an EIR 81-111 for consideration of the River Road area of development concentration General Plan Amendment.

2) The draft final EIR before you has followed the process detailed by Section 15140 of the California Environmental Quality Act guidelines and Section 15146 regarding compiling of final EIRs and their contents.

3) All consultation, public review, public notice requirements have been met.

4) Comments received during the review period and consultant responses thereto are included verbatim.

5) Certification by your board with the attached changes included, or not so included will complete the Environmental Impact Report process. After discretionary action on this project the final environmental action will be the filing of a notice of determination (CEQA 15084h)

E. W. DeMARS
DIRECTOR OF PLANNING

Attachments: 1. Suggested final changes

cc: Consultant and Applicant

EWD:LHM:jo

Staff suggests that the following changes/corrections be included in the final EIR as certified:

1. Add the letters 'M' and 'N' to Table 1.2 on page 13 to reflect their inclusion on exhibit 1.4 on page 10.

2. The "dispersed park sites" described in the text at the bottom of page 11 and top of page 12 should be added to exhibits 1.3 (page 9) and 1.4 (page 10) as appropriate.

3. Change all EIR references to "proposed" River Road ADC Criteria to read adopted River Road ADC Criteria, see page 21, 1st sentence of last paragraph for an example.

4. Change number 2 under "public works" page 23 to read "The new streets for Las Palmas would be built by developers and may be dedicated to the County as completed."

5. Add the following sentence to mitigation measure number 2 on page 54. "This program should take the form of an overall Las Palmas Ranch open space environmental management plan to be developed and be approved by the County before first development occurs.

TO: Monterey County Board of Supervisors

FROM: Toro Advisory Committee

RE: Draft Environmental Impact Report for the River Road Area of Development Concentration

DATE: 12-7-82

The Toro Advisory wishes to make the following comments regarding the River Road ADC EIR at this time.

Page 23: The section on "Police Protection" mentions, "At full development of the Toro planning area with a population of 10,000...".

This statement is incorrect in that their is no current figure for "full development" in the Toro planning area. In addition, the current population is 6,423 (from the Toro Planning Inventory). When the population of the unbuilt projects from Table 3.1 of the ADC EIR is added to the current population, 6,423 + 3,300, the projected population already equals 9,723. This figure does not include the Las Palmas project or the ADC project.

With the ADC project, minor subdivisions, and other already proposed major subdivisions, the Toro population would be in the vicinity of 17,000.

Page 25: States, "If the Existing Policy Plan is feasible in terms of marketability, it would have less fiscal impact on the county because of the relatively fixed costs per capita but higher revenues per capita."

This is an important statement in light of the county's current fiscal difficulties, and it points out that greater numbers of houses do not mean more money for the county.

2.4.2 Groundwater: This section fails to mention the 35,000 acre feet overdraft occurring anually in the Salinas Valley. The water for Las Palmas will come from the aquifers which are currently experiencing salt water intrusion. Any water taken from these aquifers for large scale development will contribute to the salt water intrusion problem.

2.7 Traffic: The 1980 traffic count for Highway 68 is 17,100 vehicles per day (vpd). The 1995 projected traffic volume for Highway 68 is approximately 32,000 vpd. (Figures from EIR)

According to the EIR, the ADC would contribute 12,300 vpd. 75% would go east on 68 and 25% would go west on 68. 25% of 12,300 = 3075 vpd going west on Highway 68.

The EIR incorrectly states that the ADC "would contribute approximately six percent to the total projected 1995 traffic

volume for this (west of River Road) segment of Highway 68". (page 70). The correct figure should be a contribution of 10% since 3075 vpd going west on Highway 68 from the ADC is approximately 10% of the 32,000 total 1995 vpd projected for Highway 68.

It would also seem pertinent to know where the other 11,825 vpd increase in traffic on Highway 68 projected from 1980-1995 is coming from. If this number is lowered, then the ADC obviously contributes a larger percentage to the increased traffic on Highway 68.

Thank you for consideration of our Committee's comments. We request that these comments be appended to the back of the EIR, rather than just placed in the file.

Sincerely,

Christine Gianascol

Christine Gianascol
Chairman

APPENDIX B

NOTICE OF PREPARATION AND NOP COMMENT LETTERS

MONTEREY COUNTY
RESOURCE MANAGEMENT AGENCY - PLANNING

Carl Holm, AICP, Director of Planning

168 W. Alisal Street, 2nd Floor
Salinas, CA 93901
http://www.co.monterey.ca.us/rma

FILED
MAR 07 2017
STEPHEN L. VAGNINI
MONTEREY COUNTY CLERK
DEPUTY

NOTICE OF PREPARATION

To: Responsible Agencies/Interested Parties

From: Luke Connolly, Monterey County Resource Management Agency – Planning Department

Subject: Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the River View at Las Palmas Development Application Planning File Number: PLN150372

The County of Monterey will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the River View at Las Palmas Development (Planning File Number: PLN150372) proposed by River View at Las Palmas, LLC. The EIR will analyze the potentially significant environmental effects associated with development of the project and the changed circumstances since the preparation of the original Las Palmas Ranch Specific Plan Environmental Impact Report for the Las Palmas Ranch project. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project. Due to time limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice (April 7th, 2017). The project description including potential environmental effects, and location, are contained in the attached materials. Please submit your response to the address shown above. We will need the name for a contact person in your agency.

The County will also hold a public scoping meeting to receive input. Your agency is welcome to send a representative to the scoping meeting. The date, time and location are to be determined.

Sincerely,

Luke Connolly
Resource Management Agency - Planning
(831) 755-5173

Attachments: Project Description
Vicinity Map

Cc: State Clearinghouse, Office of Planning and Research
1400 Tenth Street, Room 212
P.O. Box 3044
Sacramento, CA 95812-3044

Revised 4/20/16

PROJECT DESCRIPTION

The County of Monterey, Resource Management Agency will be preparing an Environmental Impact Report analyzing the potentially significant environmental effects associated with development of the project, described below, and the changed circumstances since the preparation of the original Las Palmas Ranch Specific Plan Environmental Impact Report for the Las Palmas Ranch project. The RMA has briefly identified the potential areas of impact, below, which require analysis (Aesthetics, Climate Change [not included in original EIR], Hydrology and Water Quality, Land Use and Planning, and Traffic). Potential impacts to other resource areas will require explanation as to why no impact is expected.

Project Name: River View at Las Palmas LLC
File No.: PLN150372
Location: The property is located at the end of Woodridge Court, south of River Road, Salinas (Assessor's Parcel Number 139-211-035-000), Las Palmas Ranch Subdivision (Corey House Unit 1 – Amended), Toro Area Plan. *(The owner has not yet obtained an address from RMA-Public Works)*

Project Description and Entitlements
The proposed project includes a Specific Plan Amendment, Use Permit, and Design Approval for the construction and operation of an approximately 90,000 square foot senior assisted living facility consisting of multiple structures and associated site improvements on an approximately 15.74 acre site. The facility would provide assisted living facilities and services primarily for seniors requiring varying levels of assistance.

Environmental Setting
The project site is an undeveloped 15.74-acre parcel located within the Toro Area Plan and the Las Palmas Ranch Specific Plan, approximately 0.5 miles southeast of the intersection of River Road and Highway 68. Surrounding land uses include residential development to east and southeast, undeveloped residentially-designated property to the west, resource conservation (open space) to the south, and cultivated farmland across River Road to the north. The parcel is within an area of Monterey County designated as urbanized. Coast live oak and a large number of eucalyptus trees are found on the perimeter of the property. The northern boundary of the parcel is adjacent to River Road, a proposed scenic route, and the entire parcel is within a Sensitive Viewshed area (Figure 16 of the 2010 Monterey County General Plan). The parcel is visible from Highway 68, a state-designated scenic highway.

General Plan and Zoning
The General Plan/Toro Area Plan land use designation for the site is Residential-Medium Density 2.61 units per acre; the zoning classification is Medium Density Residential, 2.61 units per acre, with a Design Control Overlay (MDR/2.61-D).

The current zoning and land use pattern was established in the Las Palmas Ranch Specific Plan and incorporated into the 1986 Toro Area Plan and subsequently in the 2010 Monterey County General Plan and Toro Area Plan.

PROJECT-SPECIFIC POTENTIAL IMPACTS

The following are the principal environmental issues to be addressed in the Environmental Impact Report (EIR).

Aesthetics

The project site is in a visually sensitive area adjacent to River Road, a proposed scenic route, and the entire parcel is within a Sensitive Viewshed area (Figure 16 of the 2010 Monterey County General Plan). The parcel is visible from Highway 68, a state-designated scenic highway. Development of the project would introduce the first man-made structures within the property and could result in potential impacts to visual resources, specifically to the public viewshed corridors along Highway 68 and River Road. The proposed structures, including thirteen small-scale units and two multi-story institutional buildings, and the resultant light emissions from these proposed structures, could be visible from the surrounding viewshed. The SEIR will, therefore, evaluate the potential impacts of the proposed project on visual resources based on the setting of the project, including impacts as viewed from public roads and nearby residences.

Climate Change / Greenhouse Gas Emissions

This resource category was not evaluated in the original Environmental Impact Report, which was certified for the Las Palmas Ranch project in 1982. There are presently no County-based thresholds for GHG emissions. The primary short-term source of criteria air pollutants and GHG emissions would result from the use of heavy construction equipment, including crew trucks and bulldozers. There will be a minor short-term increase in carbon sequestration due to tree removal; however this is expected to be eventually mitigated by tree replacement requirements. Additional long-term vehicle traffic generated by the proposed project may also be expected to produce localized air pollutant and GHG emissions. The SEIR shall include an evaluation of potential impacts to climate change based on the results of the project applicant's Trip Generation Study and Construction Management Plan, consultation with resource agencies, and the consultant's review of the technical reports.

Hydrology/Water Quality

As proposed, the project includes approximately 60,000 cubic yards (cy) of cut and 34,500 cy of fill, as well as approximately 2,000 linear feet of retaining wall. The SEIR will analyze how the proposed grading, 90,000 square feet of new structures, and 99,500 square feet of impervious surface coverage (parking areas and driveways) would alter the existing drainage patterns and potential impacts to slope erosion.

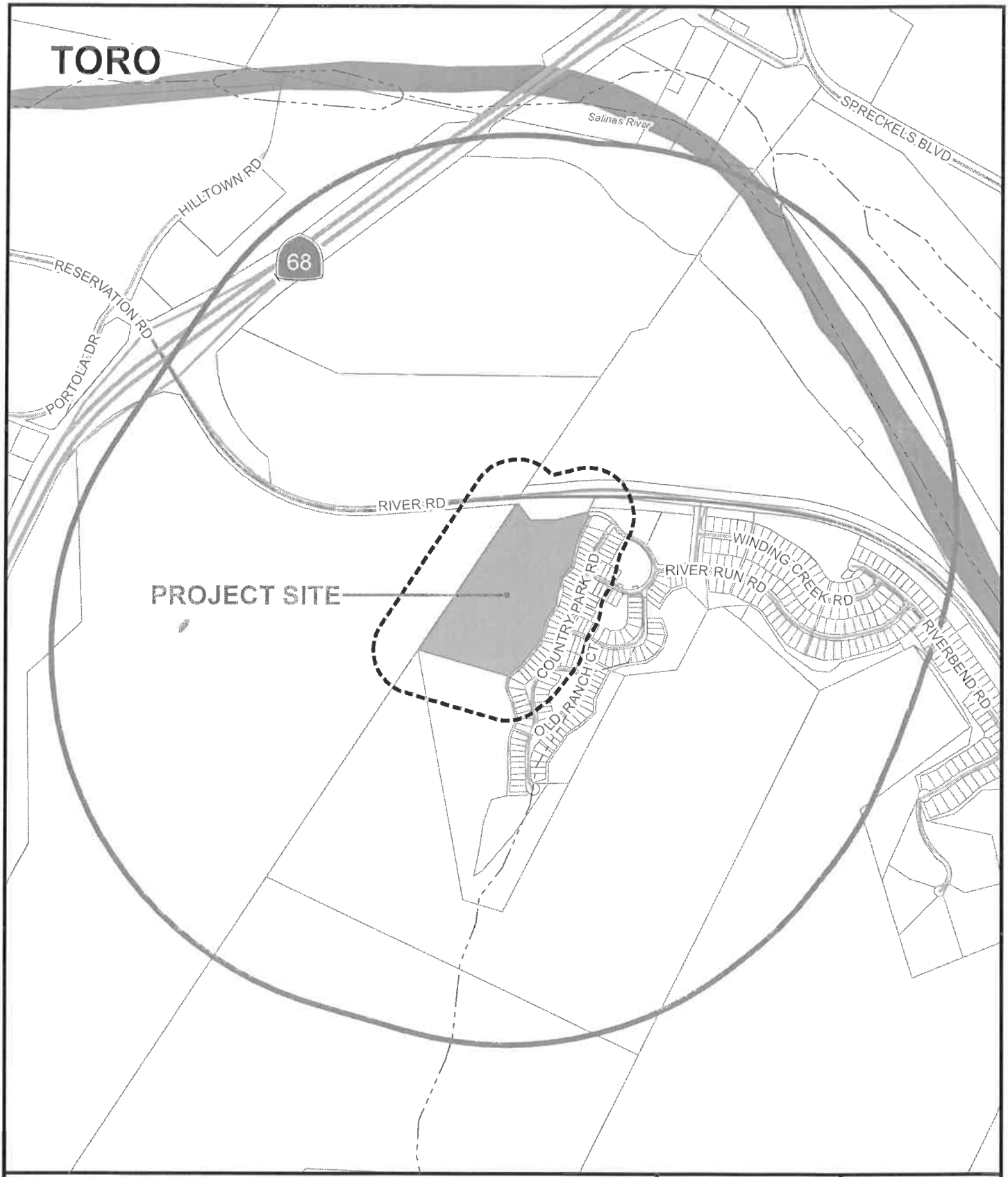
Land Use and Planning

The project includes an amendment to the Las Palmas Ranch Specific Plan . The SEIR will evaluate the project relative to the Las Palmas Ranch Specific Plan and surrounding land uses. The Specific Plan, which is predominantly characterized by residential development, with a limited commercial and institutional component, was adopted in 1983 and is nearly built-out. The proposed assisted living facility was not a use addressed in the Las Palmas Ranch Specific Plan; however, given the site's Medium-Density designation, the property could have been

developed with approximately 40 single-family residences. The SEIR will include an assessment of the project's consistency with the Monterey County General Plan and Toro Area Plan policies. The Consistency Analysis shall be included as an Appendix in the SEIR.

Transportation and Traffic

The circumstances and assumptions regarding traffic have changed since adoption of the original environmental review document for the Las Palmas Ranch project, specifically with regard to assumptions about Highway 68 expansion. Evaluation of the project in relation to these changed circumstances will be a key component of the SEIR. The project would generate additional traffic on the surrounding access roads and highways. The SEIR will evaluate the potential impacts of temporary construction traffic as well as permanent traffic increases from residents, caregivers, and guests. The project will be expected to be consistent with the Goals of the Transportation Element (Section 2.0) as designated within the 2010 Monterey County General Plan. The SEIR will include an evaluation of potential traffic impacts based on the results of the project applicant's Trip Generation Study, consultation with resource agencies and the consultant's review of technical reports.



APPLICANT: RIVER VIEW AT LAS PALMAS LLC

APN: 139-211-035-000 **FILE #** PLN150372

300' Limit | 2500' Limit | Project Site | Water

N

0 1,000 Feet

MONTEREY COUNTY CALIFORNIA 1850

PLANNER: CONNOLLY

PROJECT ASSESSMENT REPORT

Of

THE CONSTRUCTION PROPOSAL

For

A Licensed Residential Care Facility for the Elderly on Parcel "Q"
adjacent to the Las Palmas I subdivision and called Riverview at Las Palmas (RVLP)

Prepared by

Owners Subcommittee of LAS PALMAS I subdivision

BALCH, GOBETS, IPONG, MERCURIO, RATLIFF, SUTLIFF

FOR

Presentation to the Homeowners Association of
Las Palmas I, Salinas 93908
CALIFORNIA

March 23, 2017

CONTENTS

Page

INTRODUCTION **3**

SUMMARY **3**

CONCLUSIONS **4**

SECTION 1 Proposed Project Description **5**
1.1 Area Map
1.2 Description

SECTION 2 Project Details and Analysis **7**

2.1 **Project Site** 7
2.1.1 Homeowners Assessment
2.1.2 Developers Claims

2.2 **Land Use and Planning** **9**
2.2.1 Homeowners Assessment
2.2.2 Developers Claims

2.3 **Access & Traffic** **11**
2.3.1 Homeowners Assessment
2.3.1.1 Dangerous Intersection
2.3.1.2 High Accident Rate
2.3.1.3 Obsolete and Incomplete Traffic Study
2.3.1.4 Emergency Evacuation Unsafe

2.3.2 Developers Claims

2.4 **Aesthetics** **14**
2.4.1 Homeowners Assessment
2.4.1.1 Visual pollution
2.4.1.2 Noise Pollution (Not considered)
2.4.1.3 Tree Cutting poses Negative Impact
2.4.1.4 Air Pollution (not considered)
2.4.2 Developers Claims

2.5 **Biology** **17**
2.5.1 Homeowners Assessment
2.5.2 Developers Claims

2.6 **Water and Wastewater** **19**
2.6.1 Homeowners Assessment
2.6.2 Developers Claims

2.7 **Soils & Geology** **19**
2.7.1 Homeowners Assessment
2.7.2 Developers Claims

2.8 **Neighborhood Fit** **20**
2.8.2 Homeowners Assessment
2.8.2.1 Survey Rejects RVLP
2.8.2.2 LUAC Finds RVLP Inconsistent With Neighborhood
2.8.2 Not mentioned by developer

2.9 **Storm Water Runoff** **21**
2.9.1 Homeowners Assessment
2.9.1.1 Existing Flooding Risk Considerable
2.9.1.2 RVLP Construction and Operation Pose Greater Hazard

2.9.2 Not mentioned by developer

2.10 **Fire Safety** **23**
2.10.1 Homeowners Assessment
2.10.1.1 Existing Situation Already Hazardous
2.10.1.2 RVLP Adds Hazard

2.10.2 Not mentioned by developer

2.11 **Risk Management** **24**
2.11.1 Homeowners Assessment
2.11.1.1 More Risk of Collision
2.11.1.2 Traffic Choke Points Created

2.11.2 Not mentioned by developer

2.12 **Security** **28**
2.12.1 Homeowners Assessment
2.12.1.1 Security Measures Taken by Homeowners
2.12.1.2 Present Security Measures Overwhelmed
2.12.2 Not mentioned by developer

2.13 **Economic Impact** **29**
2.13.2 Homeowners Assessment
2.13.2 Not mentioned by developer

INTRODUCTION

A proposal to establish a commercial Residential Care Facility for the Elderly using a parcel of property which is part of the original Las Palmas development was brought to the attention of the existing home owners during LUAC in October 2015. The Monterey County Planning file for the project is PLN #150372.

The 15.67 acre property is owned by "Riverview at Las Palmas LLC." This property was offered for sale during the 2015 and 2016 period with an indication that a permit to proceed would be available by the fall of 2016.

The Property, known as "Parcel Q," is immediately adjacent to Phase I of the Las Palmas development and presently only accessible through this existing subdivision established in the 1990"s and consisting of some 340 residences.

Once Las Palmas I homeowners became aware of the project at initial public meetings, access-related issues were immediately raised. Homeowners strongly objected to any project related traffic across our streets and through our neighborhoods and requested the developer plan for a separate access.

On advice from the Home Owners Association Board of Las Palmas Phase I a subcommittee of homeowners organized t look into the details and ramifications of the proposed development. In the course of this work County officials and agencies were consulted and California Highway Patrol and Fire officials contacted.

SUMMARY

The proposed facility, provisionally named Riverview at Las Palmas (RVLP), is currently (3/2017) in the early stages of review at Monterey County Planning under PLN 150372. Its intended site (15.67 acres, zoned Medium Density Residential, 2.61 UA) is immediately adjacent to and overlooks a mature residential community (Las Palmas I, ~340 homes).

RVLP has a projected capacity of 144 beds and staff of 92 employees. Its projected operation is 24/7. The property owner/developer ("Riverview at Las Palmas LLC") plans to use an easement for access and egress across LP1 private roads to this sizeable commercial project.

This report analyses 13 aspects of the Project proposal. Seven of these areas of concern are contained in the Project Description published by Lombardo and Associates in May 2016, and six additional aspects we raise here for consideration.

Section 1 reviews the project proposal as set out in the various presentations by the developer and the May 2016 Project outline paper published by Lombardo and Associates of Salinas, CA on behalf of the developer.

Section 2 outlines the details of the proposed project which concern the present homeowners as contrasted by claims made by the developer.

CONCLUSIONS

RVLP, as presently described in PLN150372, should NOT be approved as it will cause serious adverse impact on traffic, security, and quality of life in the LP1 community; it violates zoning restrictions; it is not in conformance with the Las Palmas Specific Plan (6); and it raises a variety of additional detrimental environmental considerations.

Its scale and scope will bring unwarranted risk and disruption to the adjacent peaceful ~340 home residential gated community of Las Palmas 1.

Why should the Parcel Q property owner maximize the value of his property at the cost of lowering the value of Las Palmas homeowners?

The RVLP proposed development is the Wrong Project in the Wrong Location.
However, in the Salinas area there are developing areas closer to medical and general service facilities more suited to this sort of commercial medical support and treatment business.

RECOMMENDATIONS

The original development proposal for the Las Palmas sub-divisions of the 1980's should be reviewed. The developers proposals for this parcel of land (Parcel "Q") was for a handful of high end homes on this "View Property." This option should be seriously considered.

SECTION 1 THE PROPOSED PROJECT DESCRIPTION

This section is sourced verbatim from the document outlining the project published by Lombardo and Associates in May 2016. Also consulted was the Internet advertisement for RVLP.

Homeowner commentary is offered in Section 2.

1.1 Area Map

Total site coverage - 190,000 SF (27.6%)
Casitas - 41,341 SF (6%) (37,700?!)
Assisted Living – 27,052 SF (4%)
Memory Care – 21,613 SF (3%)
Roads, driveways, parking – 99,523 SF (14.6%)

1.2 Project Description

River View at Las Palmas (RVLP) is an Assisted Living Senior Community designed to provide a range of assisted care to seniors over the age of 55 and to persons with diminishing mental capacity due to Alzheimer's, dementia, or similar causes. RVLP would be licensed by the State of California as a Residential Care Facility for the Elderly (RCFE).

The community is designed for residents who do not require 24-hour skilled nursing care, but are frail and require personal assistance with activities of daily living such as dressing, bathing, grooming, and medication management. This setting allows residents who are experiencing difficulty with maintaining totally independent lifestyles to move into smaller home like suites where they can receive daily personal assistance as needed.

The RVLP community is comprised of 3 levels of residence, each with their own level of assistance:

- **Casitas**: 13 structures comprising 26 units, 37,700 SF. (41,341?!)
- **Assisted Living:** RVLP's assisted living facility is a two level structure approximately 28' in height and will cover about 27,000 SF. The AL facility includes 40 living units ranging from 360 to 587 SF and a total of 52 beds.
- **Memory Care** (a three-level structure approximately 30' in height and will cover about 21,600 SF. The MC facility includes 39 living units ranging from 313 to 453 SF and a total of 48 beds.
- RVLP expects to employ about 92 persons when operating at maximum capacity. This will include managers and supervisors, trained care givers, chefs and facility maintenance personnel
- Staff coverage is 24/7
- Shifts will be staggered to avoid peak hour trips on Highway 68

Most of the eucalyptus trees on site, approximately 80 trees, will be removed and will be replaced with a significant amount of landscaping designed to both enhance residents living environment and to screen views of the project from neighboring properties and distant views from Highway 68. A grove of eucalyptus at the north side of the Memory Care facility will remain to provide significant screening of that portion of the project from Highway 68.The project includes an internal loop road of approximately 2,400 feet in length. Development of the project will require approximately 60, 000 CY of cut, most of which will be compacted and used on site, and 34, 500 CY of fill

SECTION 2 PROJECT ANALYSIS and CONCERNS

This section reviews the Project Proposal section by section, clarifying the effects of the various parts of the proposed business development and its operations.

2.1 **Project Site**

The site also known as Parcel "Q" is a 15.67 acre view property located at the north end of the Las Palmas Phase I property.

2.1.1 Homeowners Assessment

- Unclear that Parcel Q has right to access LP1 roads without restrictions. The easement only claims a right to ingress and egress over Woodbridge Court.
- "Parcel Q" is an undeveloped portion of land within the Las Palmas I subdivision. This parcel was originally retained by the initial developer of the subdivision (Las Palmas Ranch Development Company, Inc.) and has been sold several times over the past 15 years.
- Parcel Q is currently zoned MDR/2.61-D & O-D: Medium Density Residential, 2.61 units/acre with Design Control, and Open Space with Design Control.
- We hold that commercial use of these roads is inconsistent with the MDR zoning designation

2.1.2 Developer's Claims

- Las Palmas Road, River Run and Woodridge Court are private roads maintained by the Las Palmas Ranch HOA. Developer alleges that those roads were dedicated as part of Las Palmas Subdivision #1 with no restrictions as to their use.
- Developer alleges that Parcel Q has clear rights to the use of the private roads for the proposed RVLP project

View from Winding Creek towards RVLP proposed entrance

View from proposed RVLP onto LP1

2.2 Land Use and Planning

2.2.1 Homeowners Assessment

- The site is designated as medium density residential under the Monterey County Land Use Plan: Toro Area
- as Palmas Ranch (I & II combined) has been built out to 1028 units against the stated maximum of 1031, leaving 3 units (per LPSP)
- We hold that the RVLP project is not subordinate to the residential use and character of the area.
- Necessary services do not exist nearby, nor are we aware of their planned development.
- Developer is asking to amend the LPSP to “shoe horn” this clearly non-conforming development into a neighborhood that never envisioned such commercial purposes. As stated is this not a clear admission that this RLVP is non-conforming?
- Multiple aspects of the Monterey County General Plan would be violated by this project, including (but not limited to):

    - L.U.-1.4: Growth areas shall be designated only where an adequate level of services and facilities such as water, sewerage, fire and police

protection, transportation, and schools exists or can be assured concurrent with growth and development

- L.U.-1.5: Land uses shall be designated to achieve compatibility with adjacent uses.
- L.U.-1.11: Development proposals shall be consistent with the General Plan Land Use Map designation of the subject property and the policies of this plan
- LU-2.19 The County shall refer amendments to the General Plan and zoning changes that would result in the creation of new residential, industrial, or commercial areas to the nearest cities for review and comment.
- L.U.-2.23: Medium Density Residential (MDR): Medium Density Residential areas are appropriate for a range of residential uses (1-5 units/acre) and housing types, recreational, public and quasi public, and other uses that are incidental and subordinate to the residential use and character of the area. The extent of use of land for this designation shall be limited to building coverage of 35% of the subject property.
- OS-1.2: Development in designated visually sensitive areas shall be subordinate to the natural features of the area.
- OS-1.3: To preserve the County's scenic qualities, ridgeline development shall not be allowed.
- T-1.6: Existing legal lots of record located in the critical viewshed may transfer density from the acreage within the critical viewshed to other contiguous portions of land under the same ownership, provided the resulting development meets all other Toro Area and General Plan policies.
- T-3.1: Within areas designated as "visually sensitive" on the Toro Scenic Highway Corridors and Visual Sensitivity Map (Figure 16), landscaping or new development may be permitted if the development is located and designed (building design, exterior lighting, and siting) in such a manner that will enhance the scenic value of the area.

2.2.2 Developers' Claims

- The property was zoned "MDR/2.61-D" (Medium Density Residential, 2.61 units per acre; Design Control). That zoning remains in place today. At a density of 2.61 units per acre up to 40 dwelling could be approved.

- The MCGP 2010 describes the Medium Density Residential designation as being "…appropriate for a range of residential uses (1-5 units/acre) and housing types, recreational, public and quasi-public, and other uses that are incidental and subordinate to the residential use and character of the area, building coverage[is limited to] 35% of the subject property (MCGP policy LU-2.33 a.).

- The MDR zoning district is intended to "…provide a district to accommodate Medium Density Residential uses in those areas of the County of Monterey where adequate public services and facilities exist or may be developed to support medium density development.

- "RVLP is not a residential use under the County codes or the LPRSP in that RVLP does not provide dwelling units that will operate or function as independent residential units". "For clarity and surety in regard to the future use and development of the RVLP property an amendment to the LPRSP is proposed to read:

  Assisted living facilities are allowable uses in the MDR district in that they are similar to other uses such as rest homes and public quasi-public uses currently allowed in the district. Assisted living facilities are not considered residential units and are not subject to the current 1,033 (LPSP states 1031.RG) residential limitation of the LPRSP. An Assisted living facility is not considered a residential development because it does not operate or function as independent residential units. An assisted living facility may be considered and approved on Parcel Q of Las Palmas Ranch Unit #1 consistent with the anticipated impacts of the 40 dwelling units originally planned for this site."

2.3 Access & Traffic

2.3.1 Homeowners Assessment

- When Parcel Q was created, it was granted the same access rights over the Common Area as every other lot in the subdivision. These rights have been incorporated into Parcel Q's property description attached to various Grant Deeds:

  > A non-exclusive easement for ingress, egress, road and utilities over that portion of River Run Road and Woodridge Court being a portion of Common Area Parcel C and Las Palmas Road being Common Area Parcel A as shown and designated on that Map entitled Amended Map of Las Palmas Ranch Corey House Area / Unit 1 Tract 1086A filed June 15, 1989, in Volume 16 of Cities and Towns at Page 70 in the Office of the County Recorder of Monterey County, California. Said easement shall be appurtenant to Parcel Q as shown and designated on the above referred to Map of Tract 1086A

- In this case, the owners of Parcel Q have an easement for residential access to their parcel. There is nothing in the grant of easement, or in the circumstances surrounding it, which would indicate an intention to create access rights for a substantial commercial enterprise

- The scope of an easement is determined "by the terms of the grant, or the nature of the enjoyment by which it was acquired." Cal. Civil Code § 806. Thus, the easement holder's use is "limited by the requirement that it be reasonably necessary and consistent with the purposes for which the easement was granted." *Union Pacific Railroad Co. v. Santa Fe Pacific Pipelines,Inc.* (2014) 231 Cal.App.4th 134, 164. Finally, "once fixed, the scope of the easement cannot be changed without the consent of the servient owner." *Krieger v. Pacific Gas & Electric Co*. (1981) 119 Cal.App.3d 137, 144

    - Accordingly, the access easement is for RESIDENTIAL use only

- When the project was first presented during 2015 meetings by the developer (Mr. Shingu) there was extended discussion on site access. The developer stated he had an easement through our residential neighborhood but also indicated he would explore alternate access by way of River Road NOT across Las Palmas 1 streets. However, after meeting with the County he reported that such alternate access would not be feasible.

- There was a subsequent attempt to consider a separate road across LP1 property but built to accommodate RVLP traffic separately from ordinary residential traffic. This met with strong homeowner objection. This option was rejected by the Las Palmas I HOA in that it did not address the central issues of traffic congestion and security. In September 2016, at the second LUAC meeting on this project, Mr. Shingu then insisted on using the easement.

- Access and egress to RVLP will dramatically change Woodridge Court, River Run Road and Las Palmas Road from their present lightly travelled and placid nature to a busy thoroughfare. These streets are used by residents to walk, jog, exercise their dogs, as practice venue for children's soccer games, etc. etc. Routing traffic as proposed by the developer will put an end to this valued use. The entrance into Las Palmas Road from River Road will be heavily congested. Entering traffic, waiting for clearance from the guard shack, will back up into the deceleration lane on River Road and pose serious collision hazards.

2.3.1.1 <u>Dangerous Intersection</u>

This resulting congestion will cause residents to avoid the River Road at Las Palmas Road intersection and use the unsignalized southern electronic gate at Riverview Court and River Road, incurring <u>*more*</u> risk of a traffic

accident. Under present conditions that intersection is lightly used and the 2011 HOA commissioned traffic study found such light use consistent with safe practice. The proposed RVLP project would immediately invalidate this conclusion.

2.3.1.2 High Accident Rate

Accidents at the Las Palmas and River Road intersection are unfortunately routine. The latest in early 2017 was between a passing 18 wheeler and a resident worker leaving correctly on a green light. Other accidents have resulted in tragic fatalities. CHP accident statistics report referenced.

2.3.1.3 Obsolete and Incomplete Traffic Study

With 144 beds this facility will experience substantial traffic from family and visitors, suppliers, service providers, utility companies, delivery services, contractors, and emergency vehicles. Casitas residents will have their own vehicles. Shuttles will not provide 100% of employee transportation, many will have their own vehicles and use them as they wish.

The cited traffic study is from 1982(!!). County Traffic Engineering determined on 1/12/2016 that significant information gaps need to be closed before the Traffic studies could be considered "Complete". No NEW information since 1/12/2016 has surfaced to address these information gaps, hence this section is still "Incomplete".

Not included in County Traffic Engineering's letter is any mention of the Riverview Court/River Road intersection. This is a critically important component of traffic analysis that must be included.

2.3.1.4 Emergency Evacuation – Unsafe

The present access to Las Palmas I (one single lane in and out with traffic light control to River Road and the second single lane in and out with no traffic control) was designed for the existing residential population of the development.

Adding the residents, patients, staff, contractors and support personnel to an evacuation situation risks the safety of the existing Las Palmas Residents, and also puts their evacuation capabilities at risk down a steep narrow access road , presently little more than a cart track.
Further, if and when all residents are trying to evacuate, emergency vehicles and crews will be attempting to enter to deal with the natural or man-made disaster (e.g. Sobranes type fire or earthquake etc) causing the evacuation. This poses extreme hazards……..

2.3.2 Developers Claims

- "RVLP will not have a significant effect on traffic in the area."
- "The primary traffic generation will come from employees."
- "The overall traffic impacts of the Las Palmas development were analyzed and addressed through the LPRSP and its EIR. To assess the potential impacts of the RVLP project Hatch Mott McDonald reviewed the LPRSP EIR, LPRSP, previous project conditions of approval, improvements that were constructed and did traffic counts from all of the LPR entrance points."

2.4 **Aesthetics**

2.4.1 Homeowners Assessment

The developer has considered only minimal impacts of the proposed development.

2.4.1.1 Visual Pollution:

Proposed site for RVLP is NOT a "knoll." It is at considerable elevation and will occupy a commanding view of the area. This commanding view from above implies an equally visible presence from below. The Salinas River crossing will shortly contain new bicycle and walking paths which will greatly increase foot and bicycle traffic. Residents and tourists will see the three story and other buildings of the proposed development. At dusk or evening it will be even more obvious when lit up.

2.4.1.2 Noise Pollution: (Not considered by Developer)

RVLP will be elevated (est. 100'-200') in relation to the adjacent LP1 community. Access to the site from Woodridge Court will be a new road at steep ascent (on the order of near 15% slope), which will in turn require downshifting in vehicles with attendant noise that will clearly echo into the adjacent residences of LP1. These residences were purchased in part for their quiet seclusion and semi-rural setting. Not to listen to the UPS truck grinding up the hill!

2.4.1.3 Proposed Tree Cutting poses Negative Impact

Cutting down 80 mature Eucalyptus trees imposes a dramatic negative impact on LP1 community. It will also adversely impact the microclimate in that location. These trees help shield the LP1 from strong seasonal

afternoon winds and help deaden the road noise from adjacent sections of Highway 68 and River Road.

2.4.1.4 Air Pollution: (Not considered by Developer)
RVLP is a large care facility that that provides meals to its occupants. Institutional cooking odors will be emitted and carried by prevailing winds into the adjacent LPI community.

2.4.2 Developer's Claims

- "RVLP is located on a knoll above River Road. It is an area that is primarily identified as being "visually sensitive" in the Toro Area Plan. The project site has limited visibility from southbound River Road due to road alignment, topography and native vegetation. Portions of the upper portion and roofs of some of the buildings will be visible from Highway 68 from the Salinas River crossing to the River Road exit. The project is only visible from northbound River Road at and near the intersection with Las Palmas Road. The project site is approximately ½ to ¾ mile from Highway 68 for a distance of about 3,000 feet. At the normal driving speeds on that portion of Highway 68 the project site is visible for about 30-40 seconds at car speeds."

View from RVLP towards Highway 68 & River Road intersection

View from RVLP down onto LP1

View from RVLP towards Spreckels Road

View of flagging for RVLP from Guard Shack
at River Road / Las Palmas Road intersection

2.5 **Biology**

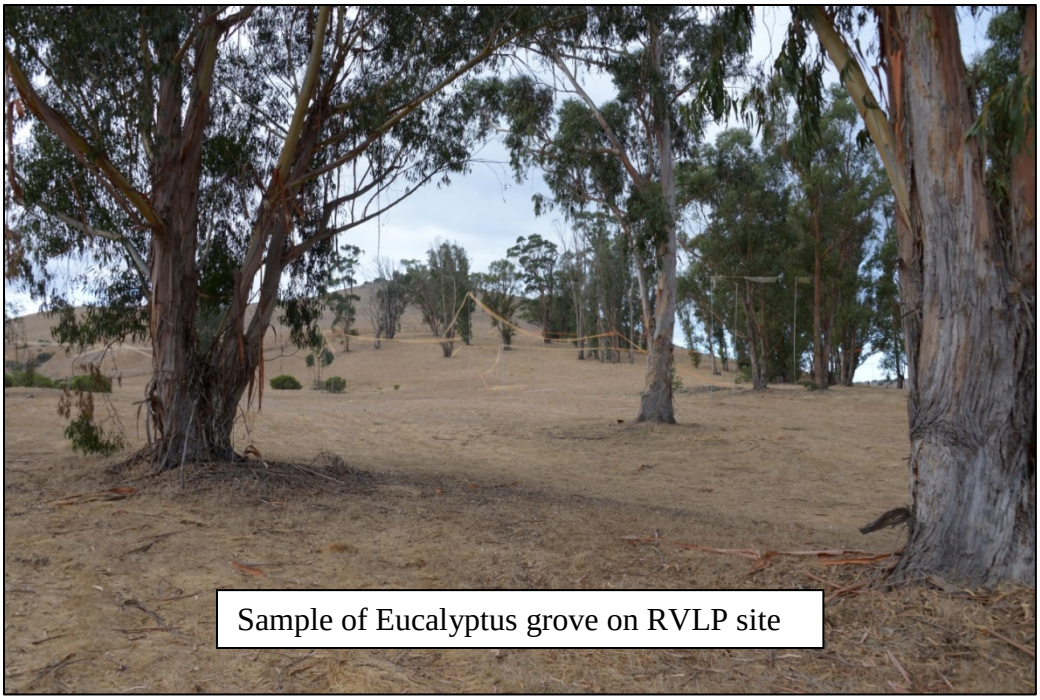
2.5.1 Homeowners Assessment

The present Eucalyptus grove is home to native owls. They hunt field rodents. One of the many charms of Las Palmas I is their night time hooting. Several of the adjacent Eucalyptus trees have already been cut down by the developer. The nests of those owls dwelling in these trees were demolished. The hooting stopped.

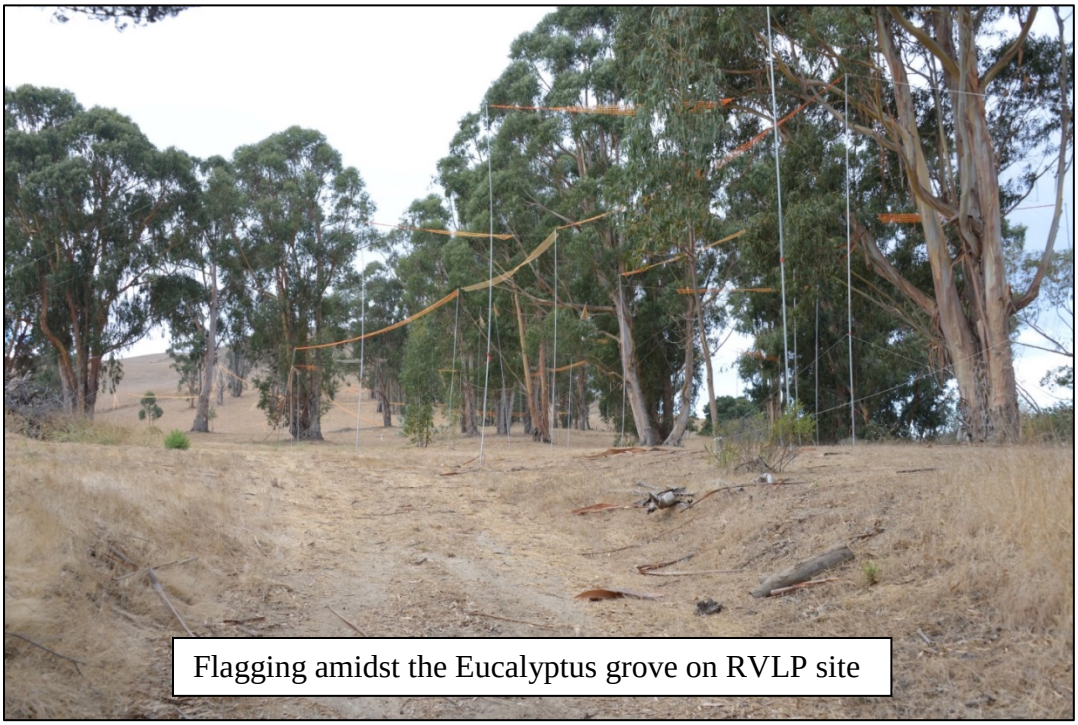
No further input at present. Study of the Ferrini EIR(s) remains to be done for comparison

2.5.2 Developer's Claims

"During the development phases of the project design the site was surveyed twice for sensitive plant and animal species. Copies of the reports are included with the project application materials. Neither report identified any sensitive plant or animal species on the property or on the properties immediately adjoining the project site. Need to see these reports."



Sample of Eucalyptus grove on RVLP site



Flagging amidst the Eucalyptus grove on RVLP site

2.6 **Water and Wastewater**

2.6.1 Homeowners Assessment

- We seriously question the tacit assumption that given California drought conditions Zone 2C can continue to satisfy new demand for water.

- If the eventual construction schedule pushes into the period governed by the next Water Study, this may no longer hold. Water district officials have stated that Zone 2c is already in an overdraft situation.

- Note: This "can and will serve " letter is valid for two years and expires in Aug. of 2017.

2.6.2 Developer's Claims

"The RVLP project domestic water use is calculated at 11.376 AFY. Water service will be provided by the California Water Service. CWS is the water provider for Las Palmas Ranch and has provided a "can and will serve" letter. The area and project site are part of the Indian Springs/Salinas Hills/Buena Vista service area. Water for the service area is taken from a well field in Zone 2C, which by policy of the Board of Supervisors is sufficient proof of a long term water supply."

2.7 **Soils & Geology**

2.7.1 Homeowners Assessment

RLVP would be on an elevated "view" property with steep slopes backing directly onto existing residences which could become unstable with such a large development in this era of climate change with strong winter storms. **Slope stability has already been compromised** with summer fire prevention requiring close cropping of vegetation and removal of some bush and trees all of which are required to maintain slope stability. Nature's bulldozer abhors slopes above 45 degrees some of which exist to homes adjacent the proposed development.

The last 100 yards of the access road to the elevated part of Parcel Q is narrow, in a cut; at a steep angle and with a sharp drop-off overlooking a steep grade. Below this grade there are adjacent homes and the fire access road which services all the homes on Country Park Road. Coping with two way traffic and heavy construction vehicles re-working this higher part of the road would compromise the existing adjacent homes and fire access.

2.7.2 Developer's Claims

"A geologic hazards and soil suitability study was done by Landset Engineering for the RVLP project. (Dated?) RG The report, which is included in the project application materials, concludes that the site is suitable for the project and makes a series of recommendations for the final engineering and design of the construction plans. Those recommendations will be incorporated into the final plans. Additionally the report identified areas around the perimeter of the property which are not suitable for structural development. All of the RVLP project structures are grouped to the interior of the property and are located outside of those areas that Landset identified as unsuitable."

Steep portion of the access road into RVLP site

2.8 **Neighborhood Fit**

2.8.1 Homeowners Assessment

2.8.1.1 Survey Rejects RVLP

- One of the first actions of the Ad Hoc owners committee was to conduct a statistically random survey of Las Palmas I property owners and renters, using information given by the parcel "Q" property owners at the 2015 meetings and presentation to the Home owners association Board.

- Of the 329 homes in LP1 165 residents were surveyed.

- The results indicated that 93% of residents do not support the project as presently known due to the perceived negative impacts of the Care Facility project on its community. Traffic and Security dominated the concerns.

2.8.1.2 LUAC Finds RVLP Inconsistent

At the LUAC meeting in September 2016, its official and unanimous recommendation was to change the project to ensure conformance to the Las Palmas Specific Plan (LPSP), which in essence would limit the scope of the project to 3 residences.

"Change project (RVLP) to adhere to the Las Palmas Specific Plan which, according to County records of housing units already built, will allow three single family dwellings to complete the build-out of Las Palmas. As proposed, this is a commercial project, and is inconsistent with the residential neighborhood."

2.8.2 No mention of this made by the developer

2.9 **Storm Water Runoff**

2.9.1 Homeowners Assessment

2.9.1.1 Existing Flooding Risk Considerable

The RVLP site is projected to be on a pristine natural mesa atop a hill rising above LP1 development. During strong rains, adjacent LPI lots currently experience strong runoff with local erosion and flooding.

2.9.1.2 RVLP Construction and Operation Pose Greater Hazard

RVLP site coverage is ~ 190,000 SF (27.6%) and will be a combination of structures, roads and parking areas. This surface area will not be able to absorb any moisture as the uncovered the soils do now. Given that, what will be the methods and the capacity of removing water runoff without undue impact on the lower lying LP1 community? Cutting down 80 Eucalyptus trees will certainly exacerbate that situation.

2.9.2 No mention of this made by the developer

Subsequent Serious Flooding Two Weeks Later During Feb. Storm. Water encroached to within one inch of two homes.

2.10 **Fire Safety**

2.10.1 Homeowners Assessment

2.10.1.1 Existing Situation Already Hazardous

California has just exited from an official state of drough, which had existed for some time

The Soberanes fire (summer 2016) destroyed 50 buildings and 132,127 acres, not far from Las Palmas I. It was THE most expensive fire in US history to suppress at $236,000,000

The inclined slopes bordering LP1 and RVLP currently already pose **extreme fire danger** most of the year around due to very dry vegetation being present on those slopes.

LPI experiences very strong afternoon winds for months at a time. These winds blow down fences and garbage cans in the streets.

Imagine a fire along the River Road corridor, whipped along by these winds

Imagine the RVLP elderly and infirm occupants and employees scrambling to get off the hill along with the residents occupying 340+ homes in LP1.

2.10.1.2 RVLP Adds Hazard

Development of RVLP during construction would pose unwarranted risk of fire due to accidental generation of sparks by equipment or careless smoking operators. Routine RLVP operations will pose continuing accidental risks of starting fires.

View from Country Park Road onto RVLP project site. Summer 2016

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2.10.2 No mention of this made by the developer

2.11 **Risk Management**

2.11.1 Homeowners Assessment

2.11.1.1 More Risk of Collision

Locating RVLP as proposed will add risk to both the LP1 community and RVLP itself. As LP1 & LP2 are nearly 100% built out per LPSP (1028 vs.1031 units max.), its roads and infrastructure are at their limits. The proposed RVLP facility was never factored into traffic flow considerations for LP1.

Inserting RVLP into this capacity-constrained setting will add unwarranted risk to both entities in terms of congestion in **non-emergency** situations.

Traffic flow at the guard shack would slow significantly, and queuing would back entering vehicles into the River Road deceleration lane and congest the exit lanes. This lane can accommodate only a few vehicles.

Between 1989, when LPI started, and January 2017 there have been 24 accidents at or near the River Road LPI entrances . In 2009 there was a fatality; one of our homeowners lost their son to a drunk driver who ran the light (CHP Reports by Burch & Tillman – (9), (10))

This big rig ran the light at River & Las Palmas Road intersection. January 2017

Passenger car totaled by big rig, 2 occupants hospitalized. January 2017

Las Palmas Road and River Road
20 Collisions 1998 - 2017
©2018 Google
Google Earth

2.11.1.2 Traffic Choke Points Created

Further, **emergency evacuation situations** like fire and/or earthquake (both very real events in this region) within present road constraints will result in unacceptable choke points for both emergency vehicle and resident access and egress, and seriously impact safety for both RVLP and LP1 residents.

2.11.2 <u>No mention of this made by the developer</u>

2.12 **Security**

2.12.1 Homeowners Assessment

2.12.1.1 Security Measures Taken by Homeowners

LPI HOA (340+ homes) has put a great deal of effort and money forth to protect personal property as vehicle and property break-ins (even in daylight) had become the norm:

- Bought out the part of the property zoned for businesses which is now a green belt open central recreation field, Corey Park.
- Banned garage sales.
- Established a guarded, gated community in 2008/9. This system works well currently.

2.12.1.2 Present Security Arrangements Overwhelmed

Projected RVLP employees and visitors would overwhelm present security arrangements. Additional security infrastructure (guards, guard house, decals) would be required.
A whole new group of people would enter LPI grounds, and once entered, would have access to the entire neighborhood. This would defeat the very measures LPI took to limit access by installing the gated and guarded community of homeowners.

View towards RVLP site from intersection of River & Las Palmas Roads

Guard shack near River and Las Palmas Road intersection

2.12.2 No mention of this made by the developer

2.13 **Economic Impact**

2.13.1 Homeowners Assessment

LPI safe, semi-rural and peaceful environmental setting commands value to the homeowners and prospective buyers. It constitutes an asset.

Establishing RVLP as envisioned will diminish this asset and consequently lower LPI Real Estate values.

Residents repeatedly stated during the survey that they did not support the Parcel Q property owner maximizing the value of his property at the cost of lowering the value of theirs.

2.13.2 No mention of this made by the developer

Residents strolling in Circle Park, one of the 4 park areas for residents

References:

(1)Project Description, Lombardo, Anthony, 2016, J. McCormack website : jnmcommercial.com

(2)Final EIR for the Las Palmas Ranch Specific Plan (EIR 81-111), Grunwald, Crawford & Associates, certified by Monterey County Board of Supervisors, December 7, 1982.

(3)Letter from Ryan Chapman (County Traffic Engineer) to Steve Mason (County Planner) Dated 1/12/2016

(4)Survey Results, Gobets, R., et.al. Presentation to LP1 HOA Board of Directors 5/'16

(5)TORO LUAC meeting minutes 10/26/'15 & 9/26'16

(6) Las Palmas Specific Plan. Adopted by the Monterey County Board of Supervisors September 20, 1983

(7) Traffic Report - Hexagon Transportation Consultants, 11/3/2011

(8) Title 21, section 21.64.010

(9) Report from Officer Burch (California Highway Patrol 960 E. Blanco Road), summarizing traffic accidents at LPI intersections.

(10) Report from Commander Tillman (California Highway Patrol 960 E. Blanco Road), summarizing traffic accidents at LPI intersections. This report to be analyzed.

ENVIRONMENTAL IMPACT REPORT (EIR) INFORMATION

For

SUBMISSION TO THE NOTICE OF PREPARATION (NOP) OF AN SEIR BY THE COUNTY OF MONTEREY

Regarding

THE RIVER VIEW AT LAS PALMAS LLC DEVELOPMENT APPLICATION PLANNING FILE NUMBER: PLN 150372

PREPARED BY
RESIDENT AND HOA BOARD MEMBER OF THE LAS PALMAS I SUBDIVISION OF SALINAS CA 93908

DAVID C. DALBY P. ENG, NSPE

APRIL 2 , 2017

CONTENTS

		Page
INTRODUCTION		**3**
SECTION 1	**Project Assessments to Date**	**3**
1.1	**Summary**	**3**
1.2	**Conclusions**	**3**
SECTION 2	**ENVIRONMENTAL EFFECTS of the PROJECT**	**5**
2.1	**Collaboration and Meetings to Date**	**5**
2.2	**Aesthetics**	5
	2.2.1 Sight Issues	
	2.2.2 Lighting	
	2.2.3 Noise and Sound Levels	
	2.2.3.1 Commercial Development Limited	
	2.2.3.2 Contractor Work Hours Limited	
2.3	**Climate Change/Greenhouse Gas Emissions**	11
	2.3.1 Drought - Grass and Forest Fire Risks	
	2.3.2 Winter - Heavy Rains and Flood	
	2.3.3 Occupancy Risk Issues	
2.4	**Hydrology/Water Quality**	15
	2.4.1 Potable Water-Ground Water	
	2.4.2 Wastewater	
	2.4.3 Flood Risk Established	
	2.4.4 Earthquake Results	
2.5	**Land Use and Planning**	17
	2.5.1 Parcel Q - Original Plan	
	2.5.2 Utility Services - Limited and Assigned	
2.6	**Transportation and Traffic**	19
	2.6.1 Traffic Estimates	
	2.6.2 **Emergency Acces and Egress**	20
Appendix - References		20

Introduction and Supplemental EIR?

This report is prepared by David C. Dalby an elected Board member of the Home Owners Association and 16 year resident of the Las Palmas I subdivision of Salinas, California 93908. The proposal of the "River View at Las Palmas LLC" is to occupy part of the Phase I parcel also known as Parcel "Q" (approx 15 acres). This was originally part of the whole Las Palmas Specific Plan of 1983 undertaken in two phases I and II.

SECTION 1 PROJECT ASSESMENTS to Date

1.1 Summary

This paper is a response the the Notice of Preparation (NOP) issued on March 7, 2017 by the Resource Management Agency - Planning of Monterey County. The paper follows and lists the CEQA question and question format guidelines as far as possible. All topics listed are considered to be capable of causing "Potentially significant Impact" on the environment and particularly in the residential neighborhood.
The effects on topics to be questioned in the EIR are as outlined in the NOP i.e. Aesthetics; Climate Change/Greenhouse Gas Emissions; Hydrology/Water Quality; Land Use and Planning and Transportation and Traffic.
Commentary on the effects of the proposed development are added complete with pictures where this emphasises the points made and effects expected.

1.2 Conclusions

Section 2 clearly outlines the severe negative effects of the proposed development on the residential population of Las Palmas I particularly those residing in the Parkside Area and not just over the construction period but also on a continuing basis.

a) The Historic Corey House, listed on the National Register, is adjacent to and completely overlooked by the development. It will be impacted by the 24x7 operation and 24x7 traffic as all traffic must pass round the property on journeys both to and from the Parcel Q development.

b) The steep slopes between the new Development and the existing residences of Las Palmas are demonstrated to be unstable in these days of Climate Change having caused mud slides and floods this year.

c) The resources for this proposed development including groundwater and grey water may only be available when those assigned to the commercial property owned by the Las Palmas owners and Las Palmas itself are taken and re-assigned. This is contrary to the home owners expectations and rights.

d) Planning for this development is argued to be deficient particlarly as the existing plan for Las Palmas I is almost complete as per the Las Palmas Special Plan of 1983 (approx)

and the proposed development is of a completely different nature, i.e. a large profitable commercial venture far away from any support or community facilities normally sought by such care homes. (this is said with the experience of our volunteers at local care homes). Further, it is an extremely large development for the site not only servicing patients needing assistance and/or treatment but also providing 26 ordinary family Casitas the residents of which may require neither support nor assistance.

e) This is a ridge-line development normally prohibited in tourism development areas and corridors. These designations include River Road and Highway # 68. The development visibility is impossible to hide and will impact other genuine Tourism developments and investments nearby.

f) Dangerous Access to River Road.
This already dangerous access (see statistics showing multiple River Road drivers running red lights) would also be overrun with the day to day increase in traffic to and from the new development and it will be impossible to cope with an evacuation due to fire, earthquake or flood. The patients would be in peril trying to leave down the narrow trail to the highway and the present residents would be in peril competing with all other residents to exit by the very limited exit lanes available.

In-escapable Summary of Conclusions:

This project is:

i) The Wrong project - demonstrably incompatible with the present 340 residential home owners needs, raising property and owners risks while reducing security and

ii) The Wrong location - with today's knowledge similar such homes are located not far from support services (e.g. Windsor Homes) and in areas capable of providing some useful community interaction (such locations are available in the Salinas area - e.g. Abbott Street area) and at

iii) The Wrong Time - for the proposed Parcel "Q"property climate change has raised the risks of Fire, Flood and other catastrophies to an alarming level - the steep, slide prone slopes of the elevated parcel offer unacceptable risks to any infirm residents and the established Las Palmas residents .

The Solution:

If necessary, construct the three remaining "high end homes" on parcel "Q" to complete the Las Palmas Development as per the original Las Palmas Special Plan.

SECTION 2 ENVIRONMENTAL EFFECTS ISSUES of the PROJECT

This section reviews the Project Proposal and identifies items of concern to be considered in the Environmental Impact Report for this project and expands on the effects of the various parts of the proposed business development and operations as presently known.

SEIR or Full EIR: Initially the paper questions the use of a Supplemental EIR rather than a full one on the basis that the original one was completed is the 1980's (toward the end of the last Century). If that old one is to be followed then the plan of the 1980's should also be followed i.e. for a small number of residential homes on Parcel Q. (See LUAC report below).

2.1 Collaboration and Meetings to Date

The property owners of Phase I of the Las Palmas Development have worked hard to collaborate with the developer and have met several times in open sessions with the developer. One of the first and consistent request by residents was for the developer to access via a separate road to the Parcel "Q" lot thus reducing the operating conflicts otherwise surfacing. These conflicts include a 24x7 operations with nearly 100 staff serving some 140 patients some even with emergency health requirements.
The developer has been unwilling or unable to arrange for a road access separate to Las Palmas Phase I.

Toro Park Land Use Advisory Committee (LUAC)
A group of owners and Board members of Las Palmas Phase I, attended a fall meeting of LUAC to outline concerns regarding the project . The LUAC Board passed a motion recommending that the project not be approved as outlined and the development of Parcel "Q" should revert to the original Las Palmas development plan of the 1980's as follows. Please note, the proposal outlined by the original Developer, Mr Fletcher at a public meeting as late as 2009 was for up to 5 high end homes on this Parcel Q view property.

2.2 Aesthetics - the New Developer's Plan

CEQA Guidelines The following are considered to have a **"Potentially Significant Impact"** on the environment.

a) Have a substantial adverse effect on a scenic vista?

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

d) Create a new source of substantial light or glare which would adversely affect day or night time views in the area?

Plus Noise and occupancy Risks (include Odours too)

The new developer plans to construct several buildings on the parcel two of which are major three story buildings with elevators, totalling some 82,000 sq ft giving a roofline of 30 - 40 feet above ground level, which will give high visibility to many surrounding homes, businesses, travellers and passers-by.

2.2.1 SIGHT ISSUES

Many **existing homes** can clearly see parts of the proposed new development, especially in the "Parkside" area of our present development. However, some homes in the River Run section also have that capability. Overall, one estimate we have by residents observations and mapping, some 150 homes have visibility either from the front or back of the home.

Outside of the Las Palmas I subdivision, **travellers (on foot, bicycle and car)** both on River Road and also from larger sections of Highway 68 will have prolonged and commanding views of the development both in the daylight and from the lights in the evening. The bridge over the Salinas river and it's approaches for several hundred yards will give clear views of the development. This especially affects cyclists and walkers who are being encouraged to use the **new elevated 'Foot/Cycle' path over the Salinas River. See photos below.**

This is clearly ridge-line development inapproporiate for this established tourism sensitive but developing area.

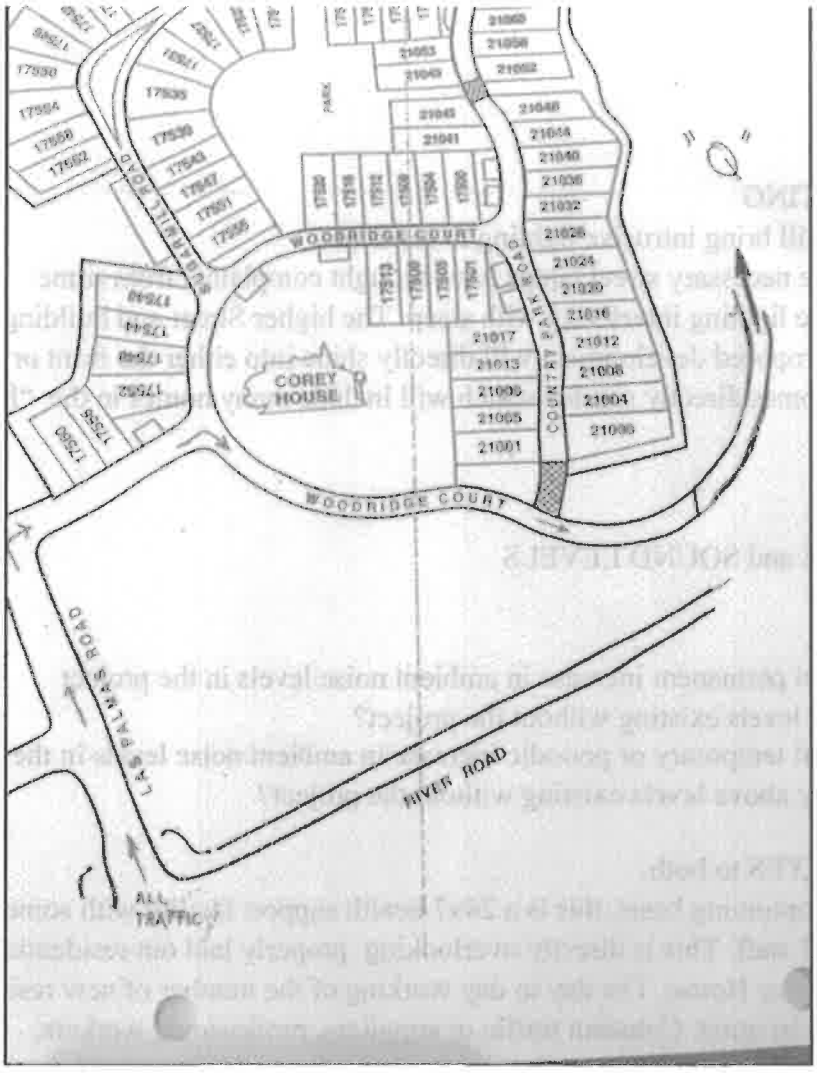
Photo below: The proposed project site is the raised level area at the end of the street, the parking lot and buildings are constructed above the steep grassy slopes on the ridgeline.

Historic Building - Corey House (Now Chateau Coralini - a Boutique Hotel) (CEQA Question b).

This 2 acre parcel is zoned LC-HR - Limited Commercial-Historic Resource.

Note: the ridgeline at the building flags.

HISTORIC BUILDING - Corey House a 19th Century farm house and the last remaining part of Hiram Corey's agrcultural 645 acre Estate.
It is now now a Boutique Hotel and is overlooked by the proposed development about 150 yards away.
Further, all traffic to and from the proposed new development must use the road shown above then turn right at the stop sign and pass the Hotel front door and round Corey house in order to access the trail to the property above on the raised 15 acre development bench.



ALL TRAFFIC TO AND FROM THE PARCEL Q DEVELOPMENT passes the front of and around Historic COREY HOUSE 24x7.

This Historic home and parcel will be heavily impacted by the development of Parcel "Q" as proposed. The construction period will provide a great deal of noise, dust and vehicular traffic. After construction the traffic side of it will again be very intrusive: i.e 24x7 operation - staff, visitors, patients all moving, occupants of Casitas coming and going plus emergency vehicles with sirens and lights during medical emergencies.

Historical Buildings and occupants require protetion to achieve conservation.

2.2.2 LIGHTING

This project will bring intrusive lighting to residents.
Even today the necessary street lamps have brought complaints from some residents of the lighting interfering with sleep. The higher Street and building lights of the proposed development will directly shine into either the front or back windows of homes directly sighted which will include many homes in the "Parkside" area.

2.2.3 NOISE and SOUND LEVELS

CEQA items:
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

The answer is YES to both.

i) On a continuing basis, this is a 24x7 health support facility with some 150 patients and 92 staff. This is directly overlooking properly laid out residential areas and the Historic Corey House. The day to day working of the number of new residents cannot be expected to be quiet. Constant traffic of suppliers, professional workers, maintenance staff, family visitors and the residents themselves must also create a new source of noise.

ii) During the construction phase of up to two years the noise will be of traffic in and out and heavy construction equipment working continually. Because of the elevated construction site the particulate in the air will offensively drift down around the surrounding residences and Corey House. Really dirty air can be expected for up to two years according to the developer.
This will be directly contrary to the efforts of the owners of this existing development have over the years consistently taken steps to provide a quiet and safe living environment for all residents. (see below).

2.2.3.1 Commercial Development Avoided

On this Phase I property commercial development has been specifically avoided by the residential owners. The 5 acre commercially zoned area of the Phase I lands, to the north and adjacent to the main Las Palmas entrance was bought out by the Phase I owners with no commercial development planned. However the owners do insist on retaining the resources and the right to develop the parcels commercially at a later date when conditions warrant it.

Therefore, at this time this proposed project then goes directly against the express wishes of the present propery owners of Las Palmas Phase I some of whom have been resident there for a very long time.

2.2.3.2 Contractor Work Hours Limited

Further the Board of the HOA manages regulations which set and limit hours of work for contractors working on homes or service contractors serving the whole of Phase I. Once more this development has no obligation to support the wishes of the present residents.

2.3 Climate Change and Greenhouse Gas Emissions

Whilst climate change was not considered as part of the planning of the original Las Palmas Development, the effects of climate change today are very clear, noticeable and with extreme levels of heat in summer and storms in winter at Las Palmas I. It is introducing a wide variety of risks and even damage which require addressing.

2.3.1 Drought and Grass/Forest Fire Risk (see photo above Parcel "Q" adjacent to Residences)

This area and region is just coming through a 5 year summer drought, but with sufficient rain in the winters to grow long stretches of significant levels of long grasses forming

fuel for grass/forest fires. The Soberanes fire of 2015 was intentionally set and covered some 33 sq. miles and destroyed some 50 structures. It started in similar terrain to Las Palmas and just a few miles south of this location. The photo above shows the slopes below the proposed development and the fence of the adjacent residences of Las Palmas I. In summer there are many continuous miles of this fire hazard of grass, brush and trees.

2.3.2 Winter Heavy Rains and Flood

Climate change not only means events such as the drought outlined above but also more extreme precipitation and wind in the winter months. Parcel "Q" is not designed nor ready for those events. So, this winter stormy weather caused two mud slides from the Parcel "Q" property which spilled onto the Phase I property covering a storm drain and ditch line which resulted in a flood into the back yards and close to the homes of two residential properties. The flood also closed the Emergency Access Road to the Country Park Road residences of Phase I. The Fire Department teams mobilized and responded to assist with the clearing of storm drain and flood water.
See below the overall mud slide some 30ft long and 10ft wide and many ft deep.
Another slide occured from the top of the rear part of the property onto River Road, the 4 lane access highway.

Photo Above: Shows the mud slide showing the back yard fences (21044

Country Park Road -approx) plus the debris on the Fire Access road (now impassable). The mud towers above the storm drain, the blocking of which caused the flood through the back yards right up to the adjacent homes.

These slopes have angles up to 60 degrees with no remediation to ensure stability as has been constructed in other parts of the development.(see photo below) The left part of the photo shows the start of the high Couloir which swings round. There is a lot more soft "mud" to feed slides in future storms. The Fire Department mobilized to help eliminate the flood.

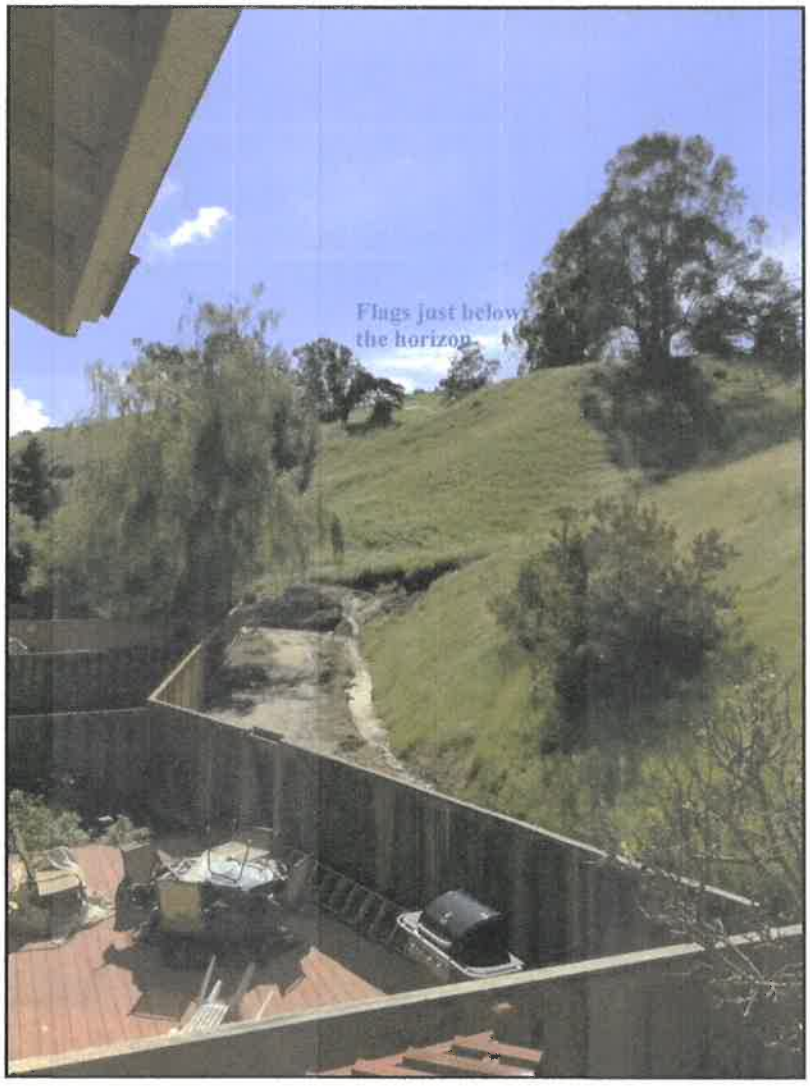
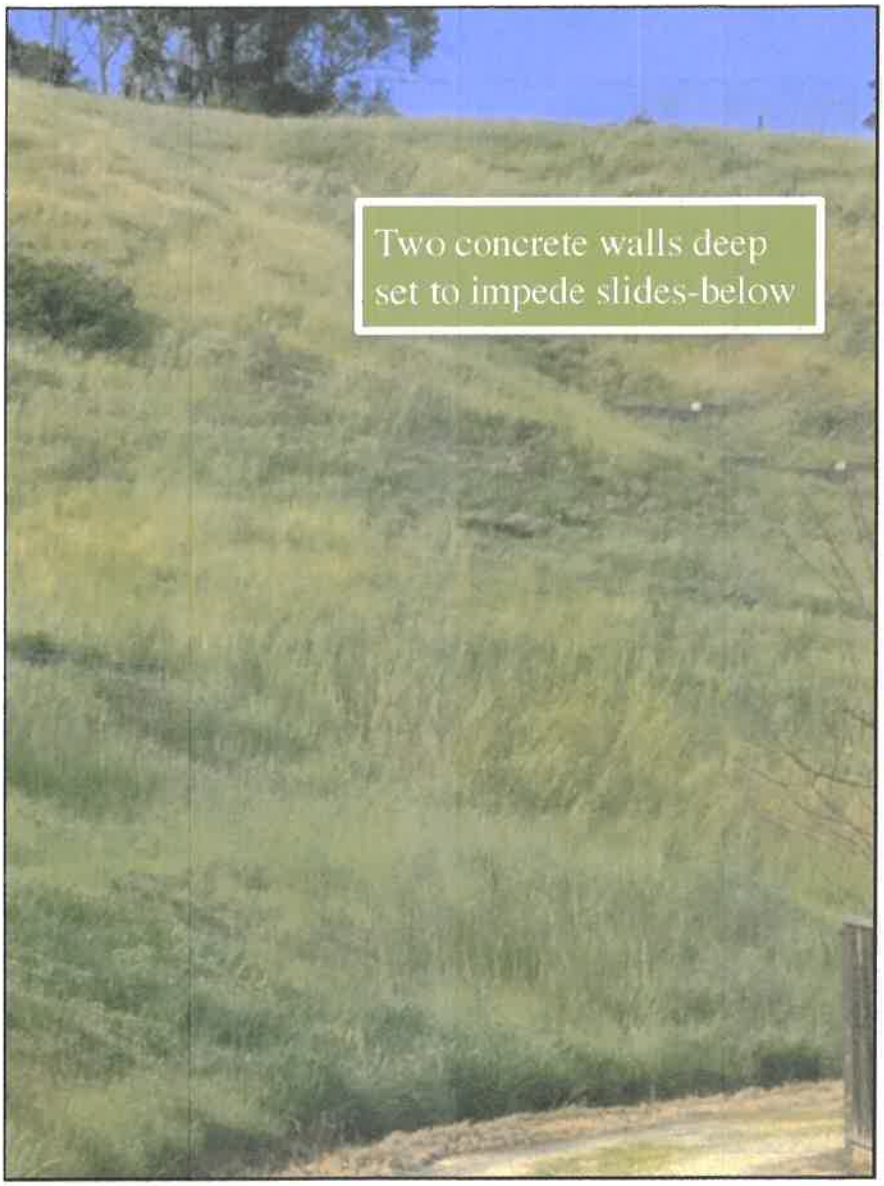


Photo Above
Showing the trail behind the House line of Country Park Road. Also showing the mud slide at the trail corner and the proposed building flagging above. Also showing above is the damage to the ditch line part of the phase I storm drain system. The Storm Drain access at the corner became blocked causing flood waters into back yards and right to the backdoor of a home. All of which have yet to be fixed.

<u>Below are shown</u> slopes further up Country Park Road with deep set concrete walls at several levels designed to impede slides. No such work has been carried out on the slopes below the proposed project on Parcel Q.



2.3.3 **Occupancy Issues**

a) The relatively high per capita occupancy of the view property certainly diplaces the relatively abundant wild life and eliminates or disturbs the flora.

b) This development represents old thinking in the support and treatment of memory stressed patients. Locking them away with limited or no social interaction. Other similar facilities in the area are better located.

c) In a catastrophic event (e.g. Fire, Flood, Earthquake) evacuation of all patients and staff would be problematic risking other home owners too. (see Sec 2.6.2)

2.4 Hydrology/Water Quality

CEQA Guidlines

IX. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any water quality standards or waste discharge requirements?

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre- existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

f) Otherwise substantially degrade water quality?

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

j) Inundation by seiche, tsunami, or mudflow?

Several of these issues have **Potentially Significant Impact** with or without Mitigation Incorporated. See commentary below.

Commentary:

2.4.1 Potable Water - Ground Water use (CEQA a) and b): 2 items

a) Whilst 'letters to serve' have been issued they are limited in time and the drought is not certain to be declared over to ensure new supplies will be available.

b) With Corey House now licensed as a full service hotel and the Owners of the commercial lots in the Las Palmas Special Plan insisting on retaining their right to develop those commercial lots at a later date, then re-assignment of existing approved water uses does not exist.

2.4.2 Wastewater Use.

The preliminary "Project Plan/Description" (Lombardo & Assoc. - May 2016) asserts the requirement to use Las Palmas Phase I wastewater system for irrigation purposes. However, the drought has shown that these waters in today's circumstances may not be available. This deficiency has serious consequences as the elevated project will not generate its own supply, therefore ignoring raised fire risks.
Without occupation this elevated parcel "Q" already exhibits a fire risk often year round and with the potential of high occupancy that risk is raised much higher. (see Page 11).

2.4.3 Flood Risk Established (CEQA - j)

This risk is already established even before stormwater from potential access roads, parking lots and buildings occurs. (see pages 11 and 12). Winter 2016-2017 was a wet one and runoff from Parcel "Q" caused two mudslides which pushed mud and water onto Las Palmas Phase I properties; compromised the storm drain system and caused floods which closed the Emergency Access road behind County Park Road (for 3 weeks) and flooded the backyards of two homes with flood water reaching the rear door of one home.

2.4.4 Earthquake Zone - Risk Established

Within a week of the Emergency Access road being re-opened this spring, the earthquake at Aromas, clearly felt in this area, caused part of the mud wall left by the clearing contractor to fall back from Parcel Q onto the storm drain of Las Palmas.
Whilst this did not close the drain again, the risk of damage is now constant without remediation.

2.5 Land Use and Planning

CEQA Guidelines The following are considered to have a "Potentially Significant Impact" on the enviroment.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

d) Conflict with Community Plan Objectives.

Conflicts

This project conflicts with the original "Special Plan", Las Palmas Phase I and Phase II of the 1980's for the development of a total of 1,035 residences, which so far has been carefully followed. There are also conflicts with the Monterey County General plan.

a) The original development containing Las Palmas I is almost filled out in accordance with the Las Palmas Special Plan of the1980's. The original developer's plan for parcel "Q" was for the construction of 5 high end residential homes. (see Fall 2009 Public Meeting Fletcher/HOA residents). This has not been completed. The Project Description/Plan called RVLP (see Lombardo and Associates - May 2016) is a Medical Support and Treatment Facility - a relatively large business and quite incompatible with the existing gated, secure residential development of some 340 homes most established for over twenty years.

b) However, in the detail of the new Project Description called RVLP on Page 2 includes an outline of the 13 Casitas (26 individual living units) as "allowing for independent living including fixing their own meals and keeping their vehicles". Assistance is just an optional extra service. Therefore these are or actually can be independent living units which alone would take the overall growth development of Las Palmas over its planned limit. A violation of Monterey County General Plan and the Las Palmas Specific Plan.

b) There is a County Land Use requirements that "land uses be compatible with adjacent land uses". Overall, this RVLP proposal is a large commercial business in the support and treatment of patients needing that support. This is not compatible with Las Palmas Phase I whose owners have confirmed the objective of residential quietness and security by buying out the "Commercially zoned" lots adjacent to the main Las Palmas entrance. Further, they have added extensive security to the residential development essential in today's world around Salinas. This security woud be seriously compromised by the RVLP development. This incompatibility was confirmed by the voting record of the LUAC meeting (Toro Land Use Advisory Commission) of September 2016.

c) Ridge Development: This development on the elevated hill top parcel "Q" is essentially 'ridgeline development' which is not allowed in the County, especially in the "Toro Scenic Highway Corridors". The view from the new walking/cycle trail across the Salinas River on Highway 68, also from parts of River Road, plus from street level in Las Palmas I, will all confirm that. Further the roads mentioned above are designated as visually sensitive for Tourism development purposes. Scenic values should be preserved. The three story buildings with elevators and say, a 40 ft roof line cannot be hidden on that elevated land. Few large trees are left after these winter storms and new ones will take a long time to grow. This development will be a "blot on the landscape" and will not enhance the scenic value of the area.

d) Home Location: Both the County Board of Supervisors and the City of Salinas are on record of condemning developers whose developments leave elderly citizens well outside of community facilities which could otherwise allow access to services and community activites from which they may benefit. In the Salinas area specific critisism has been offered to the Tynan Development on Alisal. Further an analysis of other "Care Homes" in the Salinas area offering similar support and treatment facilities to RVLP are located in or adjacent to the community where medical and living support services are close-by and where beneficial services and supplies are available encouraging patients to participate in the community to some extent where possible.

2.5.1 Parcel Q - Original Plan

The published intent for the development of this parcel was for some 5 high end homes on what is in fact view property. Such a development of high end homes (or the number remaining to complete the joriginal plan) would be compatible with the existing huge investment in homes and operations made by the present owners of Las Palmas Phase I.

2.5.2 Utilities Services Limited & Assigned

i) Corey House (now Chateau Coralini) is licensed and set up as a boutique, full service Hotel.

ii) Other assigned utilities services are reserved for a future commercial development on the commercially zoned lots owned by the Las Palmas Phase I owners.
Therefore services for the proposed Parcel "Q" development are in reality not available.

2.6 Transportation and Traffic

CEQA Guidelines **The following are considered to have a "Potentially Significant Impact" on the enviroment.**

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

e) Result in inadequate emergency access?

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

2.6.1 Traffic Estimates

Those from the developer are challenged.
24x7 staff cannot be expected to wait in remote areas for a bus. They will use their vehicles. Further, our volunteers's experience with these local homes which shows that every day can be visitor's day. These homes increasingly rely on family members to help patients to keep connected with family and friends who assist with their treatment.

2.6.2 Emergency Access and Egress

Recent studies of traffic at Las Palmas I is that the traffic patern is usually not heavy.
However the addition of the development and operational traffic will change that.
There are two acess to Las Palmas I. The North one has a control traffic light on to River Road. The second access, a few hundred yards south, is uncontrolled and in busy times is very difficult for Las Palmas residents to leave or assistance to come in from the south.
In a catastrophic event, (Fire, Earthquake etc) it will be difficult to evacuate the 340 home owners, let alone also the more remote patients and employees of the proposed development.
In this case there is no back door to the proposed development, as other such developments often have, and all must compete with local residents also wishing to leave. And it may be dark. Further, at the same time emergency crews will be trying to enter the complex via the single lane off ramp from River Road
This looks to be a recipe for a disaster for all.

Appendix 1

Reference: Project Description - River View at Las Palmas per Lombardo and Associates - May 2016

Pat McNeill
17592 River Run Road
Salinas CA, 93908
April 2, 2017

Luke Connolly, MCRMA-Planning
168 W. Alisal Street
Salinas, CA 93901

RE: PLN150372 EIR for River View at Las Palmas

As a long term resident of Las Palmas and an interested party, I would like to offer a few points on the EIR preparation for the proposed project.

1. Geologically, the property appears to be a marine terrace dating to a high stand of the Pacific Ocean during the Pleistocene era. Its age and location make it a highly possible location for Paleoindian occupation during the terminal Pleistocene and early Holocene. Such sites are extremely rare in California and consequently, the EIR should include an archaeology component conducted by Paleoindian specialists.
2. The encroachment by development around the parcel have left it in the position of a reservoir/refuge for numerous botanical species such as milkweed which is essential to the propagation of Monarch butterfly larvae, and juvenile coast live oak which are empirically absent from the surrounding lands which are either grazed or already suburbanized.
3. A socio-cultural norm has become established in the 25+ year hiatus of development since the original EIR for Las Palmas. The community of Las Palmas has long since progressed beyond being a flexible new development. Two generations of children have come of age living in the community. Numerous residents have moved away in the trajectory of life and career and returned at significant expense to re-enter the lifestyle they enjoyed before. The residents of Las Palmas have a right to expect continuity and stability in their community as-they-know-it.
4. If the proposed development will have a negative or de-stabilizing impact on any of the items listed above, the EIR must clearly determine the scope and sequence to mitigate impacts by the developer such that 'after' is an improvement over 'before'.

Thank you for the opportunity to contribute.

Sincerely,

Pat McNeill

COUNTY OF MONTEREY
HEALTH DEPARTMENT
Elsa Jimenez, Director of Health

Administration
Behavioral Health
Clinic Services
Emergency Medical Services
Environmental Health/Animal Services
Public Health
Public Administrator/Public Guardian

April 3, 2017

Luke Connolly
Monterey County Planning Department

RE: Notice of Preparation for an EIR: PLN150372, River View at Las Palmas, LLC

Dear Luke,

Thank you for the opportunity to comment on the scope of the Environmental Impact Report (EIR) for the this project.

The Monterey County Health Department, Environmental Health Bureau (EHB), will be the responsible agency to review and regulate the following:

- **Water and Sewage:** This project is intending to connect to California-American Water municipal services to meet the needs for Water and Wastewater for this project. Verification from California-American Water will be required prior to EHB supporting this project.

- **Food Facility:** EHB regulates food facilities pursuant to the CA Retail Food Code. Applicant will be required to submit for food plan check prior to issuance of building permits.

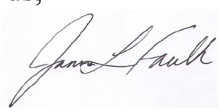
- **Medical Waste:** Prior to issuance of building permits a medical waste application will be required pursuant to California Health and Safety Code, Sections 117600-118360.

- **Hazardous Materials:** Hazardous Materials Business Response Plan will be required prior to commencement of operation pursuant to California Code of Regulations, Title 19, Division 2, Chapter 4; California Health and Safety Code, Division 20, Chapter 6.95; and MCC, Chapter 10.65).

- **Solid Waste:** A recycling plan and appropriate garbage enclosures will be required prior to issuance of building permits pursuant to Monterey County Code Chapter 10.41 and Chesbro, AB 341- (Statewide Mandatory Commercial Recycling). Additionally, Chesbro, AB1826- (Mandatory Organics Recycling) requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses and multifamily dwellings that consist of five or more units. As of January 1, 2017 this mandate pertains to those facility's that generate 4 cubic yards or more of organic waste.

Please contact Janna Faulk at (831) 755-4549 or faulkjl@co.monterey.ca.us with questions.

Regards,



Janna L Faulk, REHS
Environmental Health Specialist III

APPENDIX C

CALIFORNIA EMISSIONS ESTIMATOR MODEL RESULTS

River View at Las Palmas Assisted Living Senior Facilty

Monterey Bay Unified APCD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Asphalt Surfaces	69.12	1000sqft	1.59	69,120.00	0
Parking Lot	76.00	Space	0.68	30,400.00	0
Retirement Community	105.00	Dwelling Unit	2.07	147,355.00	147

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.8	**Precipitation Freq (Days)**	53
Climate Zone	4			**Operational Year**	2020
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Acreage (building coverage) and Bldg gross SF from project plans. Population based on 147 beds max from client.

Construction Off-road Equipment Mitigation - Per Air District guidelines

Area Mitigation - Per Air District guidelines

Energy Mitigation -

Water Mitigation -

Grading - Fill material to be imported and used onsite per project plan

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	40	0
tblGrading	MaterialImported	0.00	34,500.00
tblLandUse	BuildingSpaceSquareFeet	105,000.00	147,355.00
tblLandUse	LandUseSquareFeet	105,000.00	147,355.00
tblLandUse	LotAcreage	21.00	2.07
tblLandUse	Population	300.00	147.00
tblProjectCharacteristics	OperationalYear	2018	2020
tblTripsAndVMT	HaulingTripNumber	4,313.00	4,312.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2018	0.4725	4.4871	3.1703	7.4400e-003	0.2371	0.2088	0.4459	0.0829	0.1960	0.2788	0.0000	680.0583	680.0583	0.0985	0.0000	682.5214
2019	0.9722	0.2221	0.2230	3.9000e-004	6.9800e-003	0.0123	0.0193	1.8700e-003	0.0115	0.0134	0.0000	34.3330	34.3330	7.2700e-003	0.0000	34.5147
Maximum	**0.9722**	**4.4871**	**3.1703**	**7.4400e-003**	**0.2371**	**0.2088**	**0.4459**	**0.0829**	**0.1960**	**0.2788**	**0.0000**	**680.0583**	**680.0583**	**0.0985**	**0.0000**	**682.5214**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Category	tons/yr										MT/yr					
Area	0.7095	0.0126	1.0883	6.0000e-005		5.9800e-003	5.9800e-003		5.9800e-003	5.9800e-003	0.0000	1.7724	1.7724	1.7300e-003	0.0000	1.8157
Energy	7.5400e-003	0.0644	0.0274	4.1000e-004		5.2100e-003	5.2100e-003		5.2100e-003	5.2100e-003	0.0000	230.5805	230.5805	8.4800e-003	2.8300e-003	231.6351
Mobile	0.1127	0.5845	1.3500	3.5800e-003	0.2596	4.4100e-003	0.2641	0.0698	4.1500e-003	0.0739	0.0000	328.5383	328.5383	0.0183	0.0000	328.9964
Waste						0.0000	0.0000		0.0000	0.0000	9.8045	0.0000	9.8045	0.5794	0.0000	24.2901
Water						0.0000	0.0000		0.0000	0.0000	2.1704	15.1602	17.3306	0.2236	5.4100e-003	24.5316
Total	**0.8297**	**0.6616**	**2.4657**	**4.0500e-003**	**0.2596**	**0.0156**	**0.2752**	**0.0698**	**0.0153**	**0.0851**	**11.9749**	**576.0514**	**588.0263**	**0.8316**	**8.2400e-003**	**611.2690**

4.0 Operational Detail - Mobile

4.1 Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Unmitigated	0.1127	0.5845	1.3500	3.5800e-003	0.2596	4.4100e-003	0.2641	0.0698	4.1500e-003	0.0739	0.0000	328.5383	328.5383	0.0183	0.0000	328.9964

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Retirement Community	252.00	213.15	204.75	690,549	690,549
Total	252.00	213.15	204.75	690,549	690,549

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Retirement Community	10.80	7.30	7.50	44.00	18.80	37.20	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.533000	0.030830	0.199754	0.134871	0.025112	0.005817	0.017861	0.037451	0.003065	0.002809	0.007291	0.001110	0.001028
Parking Lot	0.533000	0.030830	0.199754	0.134871	0.025112	0.005817	0.017861	0.037451	0.003065	0.002809	0.007291	0.001110	0.001028
Retirement Community	0.533000	0.030830	0.199754	0.134871	0.025112	0.005817	0.017861	0.037451	0.003065	0.002809	0.007291	0.001110	0.001028

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Install Energy Efficient Appliances

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	152.6161	152.6161	6.9000e-003	1.4300e-003	153.2141
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	155.9499	155.9499	7.0500e-003	1.4600e-003	156.5610
NaturalGas Mitigated	7.5400e-003	0.0644	0.0274	4.1000e-004		5.2100e-003	5.2100e-003		5.2100e-003	5.2100e-003	0.0000	74.6306	74.6306	1.4300e-003	1.3700e-003	75.0741
NaturalGas Unmitigated	7.5400e-003	0.0644	0.0274	4.1000e-004		5.2100e-003	5.2100e-003		5.2100e-003	5.2100e-003	0.0000	74.6306	74.6306	1.4300e-003	1.3700e-003	75.0741

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Retirement Community	1.39853e+006	7.5400e-003	0.0644	0.0274	4.1000e-004		5.2100e-003	5.2100e-003		5.2100e-003	5.2100e-003	0.0000	74.6306	74.6306	1.4300e-003	1.3700e-003	75.0741
Total		**7.5400e-003**	**0.0644**	**0.0274**	**4.1000e-004**		**5.2100e-003**	**5.2100e-003**		**5.2100e-003**	**5.2100e-003**	**0.0000**	**74.6306**	**74.6306**	**1.4300e-003**	**1.3700e-003**	**75.0741**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Retirement Community	1.39853e+006	7.5400e-003	0.0644	0.0274	4.1000e-004		5.2100e-003	5.2100e-003		5.2100e-003	5.2100e-003	0.0000	74.6306	74.6306	1.4300e-003	1.3700e-003	75.0741
Total		**7.5400e-003**	**0.0644**	**0.0274**	**4.1000e-004**		**5.2100e-003**	**5.2100e-003**		**5.2100e-003**	**5.2100e-003**	**0.0000**	**74.6306**	**74.6306**	**1.4300e-003**	**1.3700e-003**	**75.0741**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000

Parking Lot	26752	7.7825	3.5000e-004	7.0000e-005	7.8130
Retirement Community	509321	148.1674	6.7000e-003	1.3900e-003	148.7480
Total		**155.9499**	**7.0500e-003**	**1.4600e-003**	**156.5610**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	26752	7.7825	3.5000e-004	7.0000e-005	7.8130
Retirement Community	497862	144.8337	6.5500e-003	1.3500e-003	145.4012
Total		**152.6161**	**6.9000e-003**	**1.4200e-003**	**153.2141**

6.0 Area Detail

6.1 Mitigation Measures Area

Use only Natural Gas Hearths

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.7095	0.0126	1.0883	6.0000e-005		5.9800e-003	5.9800e-003		5.9800e-003	5.9800e-003	0.0000	1.7724	1.7724	1.7300e-003	0.0000	1.8157
Unmitigated	0.7095	0.0126	1.0883	6.0000e-005		5.9800e-003	5.9800e-003		5.9800e-003	5.9800e-003	0.0000	1.7724	1.7724	1.7300e-003	0.0000	1.8157

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0943					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.5819					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0333	0.0126	1.0883	6.0000e-005		5.9800e-003	5.9800e-003		5.9800e-003	5.9800e-003	0.0000	1.7724	1.7724	1.7300e-003	0.0000	1.8157
Total	**0.7095**	**0.0126**	**1.0883**	**6.0000e-005**		**5.9800e-003**	**5.9800e-003**		**5.9800e-003**	**5.9800e-003**	**0.0000**	**1.7724**	**1.7724**	**1.7300e-003**	**0.0000**	**1.8157**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	14.7428	0.1789	4.3300e-003	20.5070
Unmitigated	17.3306	0.2236	5.4100e-003	24.5316

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000

Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Retirement Community	6.84117 / 4.31291	17.3306	0.2236	5.4100e-003	24.5316
Total		**17.3306**	**0.2236**	**5.4100e-003**	**24.5316**

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Other Asphalt Surfaces	0 / 0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Retirement Community	5.47294 / 4.31291	14.7428	0.1789	4.3300e-003	20.5070
Total		**14.7428**	**0.1789**	**4.3300e-003**	**20.5070**

River View at Las Palmas Assisted Living Senior Facilty

Monterey Bay Unified APCD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Asphalt Surfaces	69.12	1000sqft	1.59	69,120.00	0
Parking Lot	76.00	Space	0.68	30,400.00	0
Retirement Community	105.00	Dwelling Unit	2.07	147,355.00	147

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.8	**Precipitation Freq (Days)**	53
Climate Zone	4			**Operational Year**	2020
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Acreage (building coverage) and Bldg gross SF from project plans. Population based on 147 beds max from client.

Construction Off-road Equipment Mitigation - Per Air District guidelines

Area Mitigation - Per Air District guidelines

Energy Mitigation -

Water Mitigation -

Grading - Fill material to be imported and used onsite per project plan

Table Name	Column Name	Default Value	New Value

tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	40	0
tblGrading	MaterialImported	0.00	34,500.00
tblLandUse	BuildingSpaceSquareFeet	105,000.00	147,355.00
tblLandUse	LandUseSquareFeet	105,000.00	147,355.00
tblLandUse	LotAcreage	21.00	2.07
tblLandUse	Population	300.00	147.00
tblProjectCharacteristics	OperationalYear	2018	2020
tblTripsAndVMT	HaulingTripNumber	4,313.00	4,312.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2018	8.4811	209.7820	48.5526	0.4789	18.2141	2.6300	20.7924	9.9699	2.4592	12.3419	0.0000	50,365.5705	50,365.5705	2.8530	0.0000	50,436.8946
2019	105.1320	25.3241	23.0188	0.0456	1.1507	1.3285	2.4792	0.3095	1.2494	1.5589	0.0000	4,489.9714	4,489.9714	0.7262	0.0000	4,508.1258
Maximum	**105.1320**	**209.7820**	**48.5526**	**0.4789**	**18.2141**	**2.6300**	**20.7924**	**9.9699**	**2.4592**	**12.3419**	**0.0000**	**50,365.5705**	**50,365.5705**	**2.8530**	**0.0000**	**50,436.8946**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					

2018	8.4811	209.7820	48.5526	0.4789	12.7908	2.6300	15.4208	4.5080	2.4592	6.8800	0.0000	50,365.5705	50,365.5705	2.8530	0.0000	50,436.8946
2019	105.1320	25.3241	23.0188	0.0456	1.1507	1.3285	2.4792	0.3095	1.2494	1.5589	0.0000	4,489.9714	4,489.9714	0.7262	0.0000	4,508.1258
Maximum	**105.1320**	**209.7820**	**48.5526**	**0.4789**	**12.7908**	**2.6300**	**15.4208**	**4.5080**	**2.4592**	**6.8800**	**0.0000**	**50,365.5705**	**50,365.5705**	**2.8530**	**0.0000**	**50,436.8946**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**28.01**	**0.00**	**23.08**	**53.13**	**0.00**	**39.29**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	3.9713	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478	0.0000	15.6298	15.6298	0.0153	0.0000	16.0121
Energy	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524
Mobile	0.6946	3.2431	7.8935	0.0216	1.5476	0.0254	1.5730	0.4147	0.0239	0.4386		2,186.6652	2,186.6652	0.1171		2,189.5932
Total	**4.7072**	**3.6969**	**16.7501**	**0.0244**	**1.5476**	**0.1018**	**1.6494**	**0.4147**	**0.1003**	**0.5149**	**0.0000**	**2,653.0686**	**2,653.0686**	**0.1411**	**8.2600e-003**	**2,659.0578**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	3.9713	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478	0.0000	15.6298	15.6298	0.0153	0.0000	16.0121

Energy	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524
Mobile	0.6946	3.2431	7.8935	0.0216	1.5476	0.0254	1.5730	0.4147	0.0239	0.4386		2,186.6652	2,186.6652	0.1171		2,189.5932
Total	**4.7072**	**3.6969**	**16.7501**	**0.0244**	**1.5476**	**0.1018**	**1.6494**	**0.4147**	**0.1003**	**0.5149**	**0.0000**	**2,653.0686**	**2,653.0686**	**0.1411**	**8.2600e-003**	**2,659.0578**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/8/2018	2/2/2018	5	20	
2	Site Preparation	Site Preparation	2/3/2018	2/9/2018	5	5	
3	Grading	Grading	2/10/2018	2/21/2018	5	8	
4	Building Construction	Building Construction	2/22/2018	1/9/2019	5	230	
5	Paving	Paving	1/10/2019	2/4/2019	5	18	
6	Architectural Coating	Architectural Coating	2/5/2019	2/28/2019	5	18	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 4

Acres of Paving: 2.27

Residential Indoor: 298,394; Residential Outdoor: 99,465; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area:

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74

Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Excavators	1	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Paving	Cement and Mortar Mixers	2	6.00	9	0.56
Paving	Pavers	1	8.00	130	0.42
Paving	Paving Equipment	2	6.00	132	0.36
Paving	Rollers	2	6.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Architectural Coating	1	23.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	117.00	28.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	6	15.00	0.00	4,312.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	20.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Clean Paved Roads

3.2 Demolition - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.7190	38.3225	22.3040	0.0388		1.9386	1.9386		1.8048	1.8048		3,871.7665	3,871.7665	1.0667		3,898.4344
Total	**3.7190**	**38.3225**	**22.3040**	**0.0388**		**1.9386**	**1.9386**		**1.8048**	**1.8048**		**3,871.7665**	**3,871.7665**	**1.0667**		**3,898.4344**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0804	0.0672	0.7084	1.3800e-003	0.1232	1.1100e-003	0.1243	0.0327	1.0200e-003	0.0337		137.2751	137.2751	6.9700e-003		137.4494
Total	**0.0804**	**0.0672**	**0.7084**	**1.3800e-003**	**0.1232**	**1.1100e-003**	**0.1243**	**0.0327**	**1.0200e-003**	**0.0337**		**137.2751**	**137.2751**	**6.9700e-003**		**137.4494**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.7190	38.3225	22.3040	0.0388		1.9386	1.9386		1.8048	1.8048	0.0000	3,871.7665	3,871.7665	1.0667		3,898.4344
Total	**3.7190**	**38.3225**	**22.3040**	**0.0388**		**1.9386**	**1.9386**		**1.8048**	**1.8048**	**0.0000**	**3,871.7665**	**3,871.7665**	**1.0667**		**3,898.4344**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0804	0.0672	0.7084	1.3800e-003	0.1232	1.1100e-003	0.1243	0.0327	1.0200e-003	0.0337		137.2751	137.2751	6.9700e-003		137.4494
Total	**0.0804**	**0.0672**	**0.7084**	**1.3800e-003**	**0.1232**	**1.1100e-003**	**0.1243**	**0.0327**	**1.0200e-003**	**0.0337**		**137.2751**	**137.2751**	**6.9700e-003**		**137.4494**

3.3 Site Preparation - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000

Off-Road	4.5627	48.1988	22.4763	0.0380		2.5769	2.5769		2.3708	2.3708		3,831.6239	3,831.6239	1.1928		3,861.4448
Total	**4.5627**	**48.1988**	**22.4763**	**0.0380**	**18.0663**	**2.5769**	**20.6432**	**9.9307**	**2.3708**	**12.3014**		**3,831.6239**	**3,831.6239**	**1.1928**		**3,861.4448**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0965	0.0806	0.8500	1.6600e-003	0.1479	1.3300e-003	0.1492	0.0392	1.2300e-003	0.0405		164.7301	164.7301	8.3700e-003		164.9393
Total	**0.0965**	**0.0806**	**0.8500**	**1.6600e-003**	**0.1479**	**1.3300e-003**	**0.1492**	**0.0392**	**1.2300e-003**	**0.0405**		**164.7301**	**164.7301**	**8.3700e-003**		**164.9393**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.1298	0.0000	8.1298	4.4688	0.0000	4.4688			0.0000			0.0000
Off-Road	4.5627	48.1988	22.4763	0.0380		2.5769	2.5769		2.3708	2.3708	0.0000	3,831.6239	3,831.6239	1.1928		3,861.4448
Total	**4.5627**	**48.1988**	**22.4763**	**0.0380**	**8.1298**	**2.5769**	**10.7067**	**4.4688**	**2.3708**	**6.8396**	**0.0000**	**3,831.6239**	**3,831.6239**	**1.1928**		**3,861.4448**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0965	0.0806	0.8500	1.6600e-003	0.1479	1.3300e-003	0.1492	0.0392	1.2300e-003	0.0405		164.7301	164.7301	8.3700e-003		164.9393
Total	**0.0965**	**0.0806**	**0.8500**	**1.6600e-003**	**0.1479**	**1.3300e-003**	**0.1492**	**0.0392**	**1.2300e-003**	**0.0405**		**164.7301**	**164.7301**	**8.3700e-003**		**164.9393**

3.4 Grading - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					7.2196	0.0000	7.2196	3.4685	0.0000	3.4685			0.0000			0.0000
Off-Road	2.7733	30.6725	16.5770	0.0297		1.5513	1.5513		1.4272	1.4272		2,988.0216	2,988.0216	0.9302		3,011.2769
Total	**2.7733**	**30.6725**	**16.5770**	**0.0297**	**7.2196**	**1.5513**	**8.7709**	**3.4685**	**1.4272**	**4.8957**		**2,988.0216**	**2,988.0216**	**0.9302**		**3,011.2769**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	5.6275	179.0423	31.2673	0.4479	9.4187	1.0776	10.4964	2.5812	1.0310	3.6122		47,240.2739	47,240.2739	1.9158		47,288.1683
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0804	0.0672	0.7084	1.3800e-003	0.1232	1.1100e-003	0.1243	0.0327	1.0200e-003	0.0337		137.2751	137.2751	6.9700e-003		137.4494
Total	**5.7079**	**179.1095**	**31.9756**	**0.4492**	**9.5420**	**1.0787**	**10.6207**	**2.6139**	**1.0320**	**3.6459**		**47,377.5489**	**47,377.5489**	**1.9228**		**47,425.6177**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.2488	0.0000	3.2488	1.5608	0.0000	1.5608			0.0000			0.0000
Off-Road	2.7733	30.6725	16.5770	0.0297		1.5513	1.5513		1.4272	1.4272	0.0000	2,988.0216	2,988.0216	0.9302		3,011.2769
Total	**2.7733**	**30.6725**	**16.5770**	**0.0297**	**3.2488**	**1.5513**	**4.8002**	**1.5608**	**1.4272**	**2.9881**	**0.0000**	**2,988.0216**	**2,988.0216**	**0.9302**		**3,011.2769**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	5.6275	179.0423	31.2673	0.4479	9.4187	1.0776	10.4964	2.5812	1.0310	3.6122		47,240.2739	47,240.2739	1.9158		47,288.1683
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0804	0.0672	0.7084	1.3800e-003	0.1232	1.1100e-003	0.1243	0.0327	1.0200e-003	0.0337		137.2751	137.2751	6.9700e-003		137.4494
Total	**5.7079**	**179.1095**	**31.9756**	**0.4492**	**9.5420**	**1.0787**	**10.6207**	**2.6139**	**1.0320**	**3.6459**		**47,377.5489**	**47,377.5489**	**1.9228**		**47,425.6177**

3.5 Building Construction - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6795	23.3900	17.5804	0.0269		1.4999	1.4999		1.4099	1.4099		2,620.9351	2,620.9351	0.6421		2,636.9883
Total	**2.6795**	**23.3900**	**17.5804**	**0.0269**		**1.4999**	**1.4999**		**1.4099**	**1.4099**		**2,620.9351**	**2,620.9351**	**0.6421**		**2,636.9883**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1770	4.0123	1.0954	8.2100e-003	0.1896	0.0375	0.2270	0.0546	0.0359	0.0904		861.6025	861.6025	0.0493		862.8354
Worker	0.6270	0.5241	5.5253	0.0108	0.9611	8.6400e-003	0.9698	0.2549	7.9800e-003	0.2629		1,070.7455	1,070.7455	0.0544		1,072.1054
Total	**0.8040**	**4.5364**	**6.6207**	**0.0190**	**1.1507**	**0.0461**	**1.1968**	**0.3095**	**0.0438**	**0.3533**		**1,932.3480**	**1,932.3480**	**0.1037**		**1,934.9408**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6795	23.3900	17.5804	0.0269		1.4999	1.4999		1.4099	1.4099	0.0000	2,620.9351	2,620.9351	0.6421		2,636.9883
Total	**2.6795**	**23.3900**	**17.5804**	**0.0269**		**1.4999**	**1.4999**		**1.4099**	**1.4099**	**0.0000**	**2,620.9351**	**2,620.9351**	**0.6421**		**2,636.9883**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1770	4.0123	1.0954	8.2100e-003	0.1896	0.0375	0.2270	0.0546	0.0359	0.0904		861.6025	861.6025	0.0493		862.8354
Worker	0.6270	0.5241	5.5253	0.0108	0.9611	8.6400e-003	0.9698	0.2549	7.9800e-003	0.2629		1,070.7455	1,070.7455	0.0544		1,072.1054
Total	**0.8040**	**4.5364**	**6.6207**	**0.0190**	**1.1507**	**0.0461**	**1.1968**	**0.3095**	**0.0438**	**0.3533**		**1,932.3480**	**1,932.3480**	**0.1037**		**1,934.9408**

3.5 Building Construction - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.3612	21.0788	17.1638	0.0269		1.2899	1.2899		1.2127	1.2127		2,591.5802	2,591.5802	0.6313		2,607.3635

Total	**2.3612**	**21.0788**	**17.1638**	**0.0269**		**1.2899**	**1.2899**		**1.2127**	**1.2127**		**2,591.5802**	**2,591.5802**	**0.6313**		**2,607.3635**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1538	3.7853	0.9653	8.1800e-003	0.1896	0.0303	0.2199	0.0546	0.0290	0.0836		857.9888	857.9888	0.0470		859.1636
Worker	0.5627	0.4600	4.8897	0.0105	0.9611	8.3000e-003	0.9694	0.2549	7.6600e-003	0.2626		1,040.4024	1,040.4024	0.0479		1,041.5988
Total	**0.7164**	**4.2453**	**5.8550**	**0.0187**	**1.1507**	**0.0386**	**1.1893**	**0.3095**	**0.0367**	**0.3462**		**1,898.3912**	**1,898.3912**	**0.0948**		**1,900.7624**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.3612	21.0788	17.1638	0.0269		1.2899	1.2899		1.2127	1.2127	0.0000	2,591.5802	2,591.5802	0.6313		2,607.3635
Total	**2.3612**	**21.0788**	**17.1638**	**0.0269**		**1.2899**	**1.2899**		**1.2127**	**1.2127**	**0.0000**	**2,591.5802**	**2,591.5802**	**0.6313**		**2,607.3635**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1538	3.7853	0.9653	8.1800e-003	0.1896	0.0303	0.2199	0.0546	0.0290	0.0836		857.9888	857.9888	0.0470		859.1636
Worker	0.5627	0.4600	4.8897	0.0105	0.9611	8.3000e-003	0.9694	0.2549	7.6600e-003	0.2626		1,040.4024	1,040.4024	0.0479		1,041.5988
Total	**0.7164**	**4.2453**	**5.8550**	**0.0187**	**1.1507**	**0.0386**	**1.1893**	**0.3095**	**0.0367**	**0.3462**		**1,898.3912**	**1,898.3912**	**0.0948**		**1,900.7624**

3.6 Paving - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.2679	12.7604	12.3130	0.0189		0.7196	0.7196		0.6637	0.6637		1,843.3191	1,843.3191	0.5671		1,857.4966
Paving	0.3304					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5983**	**12.7604**	**12.3130**	**0.0189**		**0.7196**	**0.7196**		**0.6637**	**0.6637**		**1,843.3191**	**1,843.3191**	**0.5671**		**1,857.4966**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0962	0.0786	0.8358	1.7900e-003	0.1643	1.4200e-003	0.1657	0.0436	1.3100e-003	0.0449		177.8466	177.8466	8.1800e-003		178.0511
Total	**0.0962**	**0.0786**	**0.8358**	**1.7900e-003**	**0.1643**	**1.4200e-003**	**0.1657**	**0.0436**	**1.3100e-003**	**0.0449**		**177.8466**	**177.8466**	**8.1800e-003**		**178.0511**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.2679	12.7604	12.3130	0.0189		0.7196	0.7196		0.6637	0.6637	0.0000	1,843.3191	1,843.3191	0.5671		1,857.4966
Paving	0.3304					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5983**	**12.7604**	**12.3130**	**0.0189**		**0.7196**	**0.7196**		**0.6637**	**0.6637**	**0.0000**	**1,843.3191**	**1,843.3191**	**0.5671**		**1,857.4966**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0962	0.0786	0.8358	1.7900e-003	0.1643	1.4200e-003	0.1657	0.0436	1.3100e-003	0.0449		177.8466	177.8466	8.1800e-003		178.0511
Total	**0.0962**	**0.0786**	**0.8358**	**1.7900e-003**	**0.1643**	**1.4200e-003**	**0.1657**	**0.0436**	**1.3100e-003**	**0.0449**		**177.8466**	**177.8466**	**8.1800e-003**		**178.0511**

3.7 Architectural Coating - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	104.7550					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423
Total	**105.0214**	**1.8354**	**1.8413**	**2.9700e-003**		**0.1288**	**0.1288**		**0.1288**	**0.1288**		**281.4481**	**281.4481**	**0.0238**		**282.0423**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1106	0.0904	0.9612	2.0600e-003	0.1889	1.6300e-003	0.1906	0.0501	1.5100e-003	0.0516		204.5236	204.5236	9.4100e-003		204.7587
Total	**0.1106**	**0.0904**	**0.9612**	**2.0600e-003**	**0.1889**	**1.6300e-003**	**0.1906**	**0.0501**	**1.5100e-003**	**0.0516**		**204.5236**	**204.5236**	**9.4100e-003**		**204.7587**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	104.7550					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423
Total	**105.0214**	**1.8354**	**1.8413**	**2.9700e-003**		**0.1288**	**0.1288**		**0.1288**	**0.1288**	**0.0000**	**281.4481**	**281.4481**	**0.0238**		**282.0423**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1106	0.0904	0.9612	2.0600e-003	0.1889	1.6300e-003	0.1906	0.0501	1.5100e-003	0.0516		204.5236	204.5236	9.4100e-003		204.7587
Total	**0.1106**	**0.0904**	**0.9612**	**2.0600e-003**	**0.1889**	**1.6300e-003**	**0.1906**	**0.0501**	**1.5100e-003**	**0.0516**		**204.5236**	**204.5236**	**9.4100e-003**		**204.7587**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Category	lb/day										lb/day					
Mitigated	0.6946	3.2431	7.8935	0.0216	1.5476	0.0254	1.5730	0.4147	0.0239	0.4386		2,186.6652	2,186.6652	0.1171		2,189.5932
Unmitigated	0.6946	3.2431	7.8935	0.0216	1.5476	0.0254	1.5730	0.4147	0.0239	0.4386		2,186.6652	2,186.6652	0.1171		2,189.5932

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Retirement Community	252.00	213.15	204.75	690,549	690,549
Total	252.00	213.15	204.75	690,549	690,549

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Retirement Community	10.80	7.30	7.50	44.00	18.80	37.20	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.533000	0.030830	0.199754	0.134871	0.025112	0.005817	0.017861	0.037451	0.003065	0.002809	0.007291	0.001110	0.001028
Parking Lot	0.533000	0.030830	0.199754	0.134871	0.025112	0.005817	0.017861	0.037451	0.003065	0.002809	0.007291	0.001110	0.001028
Retirement Community	0.533000	0.030830	0.199754	0.134871	0.025112	0.005817	0.017861	0.037451	0.003065	0.002809	0.007291	0.001110	0.001028

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Install Energy Efficient Appliances

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524
NaturalGas Unmitigated	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Retirement Community	3831.58	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524
Total		**0.0413**	**0.3531**	**0.1503**	**2.2500e-003**		**0.0286**	**0.0286**		**0.0286**	**0.0286**		**450.7737**	**450.7737**	**8.6400e-003**	**8.2600e-003**	**453.4524**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Retirement Community	3.83158	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524
Total		**0.0413**	**0.3531**	**0.1503**	**2.2500e-003**		**0.0286**	**0.0286**		**0.0286**	**0.0286**		**450.7737**	**450.7737**	**8.6400e-003**	**8.2600e-003**	**453.4524**

6.0 Area Detail

6.1 Mitigation Measures Area

Use only Natural Gas Hearths

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	3.9713	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478	0.0000	15.6298	15.6298	0.0153	0.0000	16.0121
Unmitigated	3.9713	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478	0.0000	15.6298	15.6298	0.0153	0.0000	16.0121

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					

Architectural Coating	0.5166					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.1887					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2661	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478		15.6298	15.6298	0.0153		16.0121
Total	**3.9713**	**0.1007**	**8.7063**	**4.6000e-004**		**0.0478**	**0.0478**		**0.0478**	**0.0478**	**0.0000**	**15.6298**	**15.6298**	**0.0153**	**0.0000**	**16.0121**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.5166					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.1887					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2661	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478		15.6298	15.6298	0.0153		16.0121
Total	**3.9713**	**0.1007**	**8.7063**	**4.6000e-004**		**0.0478**	**0.0478**		**0.0478**	**0.0478**	**0.0000**	**15.6298**	**15.6298**	**0.0153**	**0.0000**	**16.0121**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

River View at Las Palmas Assisted Living Senior Facilty

Monterey Bay Unified APCD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Other Asphalt Surfaces	69.12	1000sqft	1.59	69,120.00	0
Parking Lot	76.00	Space	0.68	30,400.00	0
Retirement Community	105.00	Dwelling Unit	2.07	147,355.00	147

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.8	**Precipitation Freq (Days)**	53
Climate Zone	4			**Operational Year**	2020
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Acreage (building coverage) and Bldg gross SF from project plans. Population based on 147 beds max from client.

Construction Off-road Equipment Mitigation - Per Air District guidelines

Area Mitigation - Per Air District guidelines

Energy Mitigation -

Water Mitigation -

Grading - Fill material to be imported and used onsite per project plan

Table Name	Column Name	Default Value	New Value

tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	40	0
tblGrading	MaterialImported	0.00	34,500.00
tblLandUse	BuildingSpaceSquareFeet	105,000.00	147,355.00
tblLandUse	LandUseSquareFeet	105,000.00	147,355.00
tblLandUse	LotAcreage	21.00	2.07
tblLandUse	Population	300.00	147.00
tblProjectCharacteristics	OperationalYear	2018	2020
tblTripsAndVMT	HaulingTripNumber	4,313.00	4,312.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2018	8.6710	213.7687	51.8586	0.4697	18.2141	2.6528	20.7924	9.9699	2.4810	12.3419	0.0000	49,393.3769	49,393.3769	3.0265	0.0000	49,469.0384
2019	105.1427	25.4843	23.1662	0.0447	1.1507	1.3291	2.4798	0.3095	1.2500	1.5595	0.0000	4,401.1835	4,401.1835	0.7295	0.0000	4,419.4208
Maximum	**105.1427**	**213.7687**	**51.8586**	**0.4697**	**18.2141**	**2.6528**	**20.7924**	**9.9699**	**2.4810**	**12.3419**	**0.0000**	**49,393.3769**	**49,393.3769**	**3.0265**	**0.0000**	**49,469.0384**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					

2018	8.6710	213.7687	51.8586	0.4697	12.7908	2.6528	15.4436	4.5080	2.4810	6.8800	0.0000	49,393.3769	49,393.3769	3.0265	0.0000	49,469.0384
2019	105.1427	25.4843	23.1662	0.0447	1.1507	1.3291	2.4798	0.3095	1.2500	1.5595	0.0000	4,401.1835	4,401.1835	0.7295	0.0000	4,419.4208
Maximum	**105.1427**	**213.7687**	**51.8586**	**0.4697**	**12.7908**	**2.6528**	**15.4436**	**4.5080**	**2.4810**	**6.8800**	**0.0000**	**49,393.3769**	**49,393.3769**	**3.0265**	**0.0000**	**49,469.0384**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**28.01**	**0.00**	**22.98**	**53.13**	**0.00**	**39.29**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	3.9713	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478	0.0000	15.6298	15.6298	0.0153	0.0000	16.0121
Energy	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524
Mobile	0.6561	3.4548	8.2577	0.0206	1.5476	0.0257	1.5733	0.4147	0.0242	0.4389		2,077.3240	2,077.3240	0.1200		2,080.3239
Total	**4.6688**	**3.9086**	**17.1143**	**0.0233**	**1.5476**	**0.1021**	**1.6497**	**0.4147**	**0.1006**	**0.5152**	**0.0000**	**2,543.7274**	**2,543.7274**	**0.1439**	**8.2600e-003**	**2,549.7885**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	3.9713	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478	0.0000	15.6298	15.6298	0.0153	0.0000	16.0121

Energy	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524
Mobile	0.6561	3.4548	8.2577	0.0206	1.5476	0.0257	1.5733	0.4147	0.0242	0.4389		2,077.3240	2,077.3240	0.1200		2,080.3239
Total	**4.6688**	**3.9086**	**17.1143**	**0.0233**	**1.5476**	**0.1021**	**1.6497**	**0.4147**	**0.1006**	**0.5152**	**0.0000**	**2,543.7274**	**2,543.7274**	**0.1439**	**8.2600e-003**	**2,549.7885**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/8/2018	2/2/2018	5	20	
2	Site Preparation	Site Preparation	2/3/2018	2/9/2018	5	5	
3	Grading	Grading	2/10/2018	2/21/2018	5	8	
4	Building Construction	Building Construction	2/22/2018	1/9/2019	5	230	
5	Paving	Paving	1/10/2019	2/4/2019	5	18	
6	Architectural Coating	Architectural Coating	2/5/2019	2/28/2019	5	18	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 4

Acres of Paving: 2.27

Residential Indoor: 298,394; Residential Outdoor: 99,465; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area:

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74

Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Grading	Excavators	1	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Paving	Cement and Mortar Mixers	2	6.00	9	0.56
Paving	Pavers	1	8.00	130	0.42
Paving	Paving Equipment	2	6.00	132	0.36
Paving	Rollers	2	6.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Architectural Coating	1	23.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	117.00	28.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Demolition	6	15.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	6	15.00	0.00	4,312.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	20.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Clean Paved Roads

3.2 Demolition - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.7190	38.3225	22.3040	0.0388		1.9386	1.9386		1.8048	1.8048		3,871.7665	3,871.7665	1.0667		3,898.4344
Total	**3.7190**	**38.3225**	**22.3040**	**0.0388**		**1.9386**	**1.9386**		**1.8048**	**1.8048**		**3,871.7665**	**3,871.7665**	**1.0667**		**3,898.4344**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0883	0.0843	0.7128	1.3000e-003	0.1232	1.1100e-003	0.1243	0.0327	1.0200e-003	0.0337		129.0333	129.0333	6.7700e-003		129.2025
Total	**0.0883**	**0.0843**	**0.7128**	**1.3000e-003**	**0.1232**	**1.1100e-003**	**0.1243**	**0.0327**	**1.0200e-003**	**0.0337**		**129.0333**	**129.0333**	**6.7700e-003**		**129.2025**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	3.7190	38.3225	22.3040	0.0388		1.9386	1.9386		1.8048	1.8048	0.0000	3,871.7665	3,871.7665	1.0667		3,898.4344
Total	**3.7190**	**38.3225**	**22.3040**	**0.0388**		**1.9386**	**1.9386**		**1.8048**	**1.8048**	**0.0000**	**3,871.7665**	**3,871.7665**	**1.0667**		**3,898.4344**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0883	0.0843	0.7128	1.3000e-003	0.1232	1.1100e-003	0.1243	0.0327	1.0200e-003	0.0337		129.0333	129.0333	6.7700e-003		129.2025
Total	**0.0883**	**0.0843**	**0.7128**	**1.3000e-003**	**0.1232**	**1.1100e-003**	**0.1243**	**0.0327**	**1.0200e-003**	**0.0337**		**129.0333**	**129.0333**	**6.7700e-003**		**129.2025**

3.3 Site Preparation - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000

Off-Road	4.5627	48.1988	22.4763	0.0380		2.5769	2.5769		2.3708	2.3708		3,831.6239	3,831.6239	1.1928		3,861.4448
Total	**4.5627**	**48.1988**	**22.4763**	**0.0380**	**18.0663**	**2.5769**	**20.6432**	**9.9307**	**2.3708**	**12.3014**		**3,831.6239**	**3,831.6239**	**1.1928**		**3,861.4448**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1060	0.1012	0.8554	1.5600e-003	0.1479	1.3300e-003	0.1492	0.0392	1.2300e-003	0.0405		154.8400	154.8400	8.1200e-003		155.0430
Total	**0.1060**	**0.1012**	**0.8554**	**1.5600e-003**	**0.1479**	**1.3300e-003**	**0.1492**	**0.0392**	**1.2300e-003**	**0.0405**		**154.8400**	**154.8400**	**8.1200e-003**		**155.0430**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.1298	0.0000	8.1298	4.4688	0.0000	4.4688			0.0000			0.0000
Off-Road	4.5627	48.1988	22.4763	0.0380		2.5769	2.5769		2.3708	2.3708	0.0000	3,831.6239	3,831.6239	1.1928		3,861.4448
Total	**4.5627**	**48.1988**	**22.4763**	**0.0380**	**8.1298**	**2.5769**	**10.7067**	**4.4688**	**2.3708**	**6.8396**	**0.0000**	**3,831.6239**	**3,831.6239**	**1.1928**		**3,861.4448**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1060	0.1012	0.8554	1.5600e-003	0.1479	1.3300e-003	0.1492	0.0392	1.2300e-003	0.0405		154.8400	154.8400	8.1200e-003		155.0430
Total	**0.1060**	**0.1012**	**0.8554**	**1.5600e-003**	**0.1479**	**1.3300e-003**	**0.1492**	**0.0392**	**1.2300e-003**	**0.0405**		**154.8400**	**154.8400**	**8.1200e-003**		**155.0430**

3.4 Grading - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					7.2196	0.0000	7.2196	3.4685	0.0000	3.4685			0.0000			0.0000
Off-Road	2.7733	30.6725	16.5770	0.0297		1.5513	1.5513		1.4272	1.4272		2,988.0216	2,988.0216	0.9302		3,011.2769
Total	**2.7733**	**30.6725**	**16.5770**	**0.0297**	**7.2196**	**1.5513**	**8.7709**	**3.4685**	**1.4272**	**4.8957**		**2,988.0216**	**2,988.0216**	**0.9302**		**3,011.2769**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	5.8095	183.0118	34.5688	0.4387	9.4187	1.1004	10.5191	2.5812	1.0528	3.6340		46,276.3220	46,276.3220	2.0895		46,328.5589
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0883	0.0843	0.7128	1.3000e-003	0.1232	1.1100e-003	0.1243	0.0327	1.0200e-003	0.0337		129.0333	129.0333	6.7700e-003		129.2025
Total	**5.8978**	**183.0961**	**35.2817**	**0.4400**	**9.5420**	**1.1015**	**10.6434**	**2.6139**	**1.0538**	**3.6677**		**46,405.3553**	**46,405.3553**	**2.0963**		**46,457.7615**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.2488	0.0000	3.2488	1.5608	0.0000	1.5608			0.0000			0.0000
Off-Road	2.7733	30.6725	16.5770	0.0297		1.5513	1.5513		1.4272	1.4272	0.0000	2,988.0216	2,988.0216	0.9302		3,011.2769
Total	**2.7733**	**30.6725**	**16.5770**	**0.0297**	**3.2488**	**1.5513**	**4.8002**	**1.5608**	**1.4272**	**2.9881**	**0.0000**	**2,988.0216**	**2,988.0216**	**0.9302**		**3,011.2769**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	5.8095	183.0118	34.5688	0.4387	9.4187	1.1004	10.5191	2.5812	1.0528	3.6340		46,276.3220	46,276.3220	2.0895		46,328.5589
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0883	0.0843	0.7128	1.3000e-003	0.1232	1.1100e-003	0.1243	0.0327	1.0200e-003	0.0337		129.0333	129.0333	6.7700e-003		129.2025
Total	**5.8978**	**183.0961**	**35.2817**	**0.4400**	**9.5420**	**1.1015**	**10.6434**	**2.6139**	**1.0538**	**3.6677**		**46,405.3553**	**46,405.3553**	**2.0963**		**46,457.7615**

3.5 Building Construction - 2018

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6795	23.3900	17.5804	0.0269		1.4999	1.4999		1.4099	1.4099		2,620.9351	2,620.9351	0.6421		2,636.9883
Total	**2.6795**	**23.3900**	**17.5804**	**0.0269**		**1.4999**	**1.4999**		**1.4099**	**1.4099**		**2,620.9351**	**2,620.9351**	**0.6421**		**2,636.9883**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1864	4.0648	1.2568	7.9700e-003	0.1896	0.0382	0.2277	0.0546	0.0365	0.0911		835.8724	835.8724	0.0542		837.2283
Worker	0.6887	0.6577	5.5599	0.0101	0.9611	8.6400e-003	0.9698	0.2549	7.9800e-003	0.2629		1,006.4598	1,006.4598	0.0528		1,007.7797
Total	**0.8751**	**4.7225**	**6.8168**	**0.0181**	**1.1507**	**0.0468**	**1.1975**	**0.3095**	**0.0445**	**0.3540**		**1,842.3321**	**1,842.3321**	**0.1070**		**1,845.0080**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6795	23.3900	17.5804	0.0269		1.4999	1.4999		1.4099	1.4099	0.0000	2,620.9351	2,620.9351	0.6421		2,636.9883
Total	**2.6795**	**23.3900**	**17.5804**	**0.0269**		**1.4999**	**1.4999**		**1.4099**	**1.4099**	**0.0000**	**2,620.9351**	**2,620.9351**	**0.6421**		**2,636.9883**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1864	4.0648	1.2568	7.9700e-003	0.1896	0.0382	0.2277	0.0546	0.0365	0.0911		835.8724	835.8724	0.0542		837.2283
Worker	0.6887	0.6577	5.5599	0.0101	0.9611	8.6400e-003	0.9698	0.2549	7.9800e-003	0.2629		1,006.4598	1,006.4598	0.0528		1,007.7797
Total	**0.8751**	**4.7225**	**6.8168**	**0.0181**	**1.1507**	**0.0468**	**1.1975**	**0.3095**	**0.0445**	**0.3540**		**1,842.3321**	**1,842.3321**	**0.1070**		**1,845.0080**

3.5 Building Construction - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.3612	21.0788	17.1638	0.0269		1.2899	1.2899		1.2127	1.2127		2,591.5802	2,591.5802	0.6313		2,607.3635

Total	**2.3612**	**21.0788**	**17.1638**	**0.0269**		**1.2899**	**1.2899**		**1.2127**	**1.2127**		**2,591.5802**	**2,591.5802**	**0.6313**		**2,607.3635**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1620	3.8279	1.1124	7.9300e-003	0.1896	0.0310	0.2205	0.0546	0.0296	0.0842		831.7986	831.7986	0.0519		833.0955
Worker	0.6166	0.5776	4.8900	9.8400e-003	0.9611	8.3000e-003	0.9694	0.2549	7.6600e-003	0.2626		977.8047	977.8047	0.0463		978.9619
Total	**0.7786**	**4.4055**	**6.0024**	**0.0178**	**1.1507**	**0.0393**	**1.1900**	**0.3095**	**0.0373**	**0.3468**		**1,809.6033**	**1,809.6033**	**0.0982**		**1,812.0574**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.3612	21.0788	17.1638	0.0269		1.2899	1.2899		1.2127	1.2127	0.0000	2,591.5802	2,591.5802	0.6313		2,607.3635
Total	**2.3612**	**21.0788**	**17.1638**	**0.0269**		**1.2899**	**1.2899**		**1.2127**	**1.2127**	**0.0000**	**2,591.5802**	**2,591.5802**	**0.6313**		**2,607.3635**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1620	3.8279	1.1124	7.9300e-003	0.1896	0.0310	0.2205	0.0546	0.0296	0.0842		831.7986	831.7986	0.0519		833.0955
Worker	0.6166	0.5776	4.8900	9.8400e-003	0.9611	8.3000e-003	0.9694	0.2549	7.6600e-003	0.2626		977.8047	977.8047	0.0463		978.9619
Total	**0.7786**	**4.4055**	**6.0024**	**0.0178**	**1.1507**	**0.0393**	**1.1900**	**0.3095**	**0.0373**	**0.3468**		**1,809.6033**	**1,809.6033**	**0.0982**		**1,812.0574**

3.6 Paving - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.2679	12.7604	12.3130	0.0189		0.7196	0.7196		0.6637	0.6637		1,843.3191	1,843.3191	0.5671		1,857.4966
Paving	0.3304					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5983**	**12.7604**	**12.3130**	**0.0189**		**0.7196**	**0.7196**		**0.6637**	**0.6637**		**1,843.3191**	**1,843.3191**	**0.5671**		**1,857.4966**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1054	0.0987	0.8359	1.6800e-003	0.1643	1.4200e-003	0.1657	0.0436	1.3100e-003	0.0449		167.1461	167.1461	7.9100e-003		167.3439
Total	**0.1054**	**0.0987**	**0.8359**	**1.6800e-003**	**0.1643**	**1.4200e-003**	**0.1657**	**0.0436**	**1.3100e-003**	**0.0449**		**167.1461**	**167.1461**	**7.9100e-003**		**167.3439**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.2679	12.7604	12.3130	0.0189		0.7196	0.7196		0.6637	0.6637	0.0000	1,843.3191	1,843.3191	0.5671		1,857.4966
Paving	0.3304					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5983**	**12.7604**	**12.3130**	**0.0189**		**0.7196**	**0.7196**		**0.6637**	**0.6637**	**0.0000**	**1,843.3191**	**1,843.3191**	**0.5671**		**1,857.4966**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1054	0.0987	0.8359	1.6800e-003	0.1643	1.4200e-003	0.1657	0.0436	1.3100e-003	0.0449		167.1461	167.1461	7.9100e-003		167.3439
Total	**0.1054**	**0.0987**	**0.8359**	**1.6800e-003**	**0.1643**	**1.4200e-003**	**0.1657**	**0.0436**	**1.3100e-003**	**0.0449**		**167.1461**	**167.1461**	**7.9100e-003**		**167.3439**

3.7 Architectural Coating - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	104.7550					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423
Total	**105.0214**	**1.8354**	**1.8413**	**2.9700e-003**		**0.1288**	**0.1288**		**0.1288**	**0.1288**		**281.4481**	**281.4481**	**0.0238**		**282.0423**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1212	0.1136	0.9613	1.9300e-003	0.1889	1.6300e-003	0.1906	0.0501	1.5100e-003	0.0516		192.2180	192.2180	9.1000e-003		192.4455
Total	**0.1212**	**0.1136**	**0.9613**	**1.9300e-003**	**0.1889**	**1.6300e-003**	**0.1906**	**0.0501**	**1.5100e-003**	**0.0516**		**192.2180**	**192.2180**	**9.1000e-003**		**192.4455**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	104.7550					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423
Total	**105.0214**	**1.8354**	**1.8413**	**2.9700e-003**		**0.1288**	**0.1288**		**0.1288**	**0.1288**	**0.0000**	**281.4481**	**281.4481**	**0.0238**		**282.0423**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.1212	0.1136	0.9613	1.9300e-003	0.1889	1.6300e-003	0.1906	0.0501	1.5100e-003	0.0516		192.2180	192.2180	9.1000e-003		192.4455
Total	**0.1212**	**0.1136**	**0.9613**	**1.9300e-003**	**0.1889**	**1.6300e-003**	**0.1906**	**0.0501**	**1.5100e-003**	**0.0516**		**192.2180**	**192.2180**	**9.1000e-003**		**192.4455**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Category	lb/day										lb/day					
Mitigated	0.6561	3.4548	8.2577	0.0206	1.5476	0.0257	1.5733	0.4147	0.0242	0.4389		2,077.3240	2,077.3240	0.1200		2,080.3239
Unmitigated	0.6561	3.4548	8.2577	0.0206	1.5476	0.0257	1.5733	0.4147	0.0242	0.4389		2,077.3240	2,077.3240	0.1200		2,080.3239

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Other Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Retirement Community	252.00	213.15	204.75	690,549	690,549
Total	252.00	213.15	204.75	690,549	690,549

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Other Asphalt Surfaces	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Retirement Community	10.80	7.30	7.50	44.00	18.80	37.20	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Other Asphalt Surfaces	0.533000	0.030830	0.199754	0.134871	0.025112	0.005817	0.017861	0.037451	0.003065	0.002809	0.007291	0.001110	0.001028
Parking Lot	0.533000	0.030830	0.199754	0.134871	0.025112	0.005817	0.017861	0.037451	0.003065	0.002809	0.007291	0.001110	0.001028
Retirement Community	0.533000	0.030830	0.199754	0.134871	0.025112	0.005817	0.017861	0.037451	0.003065	0.002809	0.007291	0.001110	0.001028

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Install Energy Efficient Appliances

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524
NaturalGas Unmitigated	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Retirement Community	3831.58	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524
Total		**0.0413**	**0.3531**	**0.1503**	**2.2500e-003**		**0.0286**	**0.0286**		**0.0286**	**0.0286**		**450.7737**	**450.7737**	**8.6400e-003**	**8.2600e-003**	**453.4524**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Land Use	kBTU/yr	lb/day										lb/day					
Other Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Retirement Community	3.83158	0.0413	0.3531	0.1503	2.2500e-003		0.0286	0.0286		0.0286	0.0286		450.7737	450.7737	8.6400e-003	8.2600e-003	453.4524
Total		**0.0413**	**0.3531**	**0.1503**	**2.2500e-003**		**0.0286**	**0.0286**		**0.0286**	**0.0286**		**450.7737**	**450.7737**	**8.6400e-003**	**8.2600e-003**	**453.4524**

6.0 Area Detail

6.1 Mitigation Measures Area

Use only Natural Gas Hearths

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	3.9713	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478	0.0000	15.6298	15.6298	0.0153	0.0000	16.0121
Unmitigated	3.9713	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478	0.0000	15.6298	15.6298	0.0153	0.0000	16.0121

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					

Architectural Coating	0.5166					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.1887					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2661	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478		15.6298	15.6298	0.0153		16.0121
Total	**3.9713**	**0.1007**	**8.7063**	**4.6000e-004**		**0.0478**	**0.0478**		**0.0478**	**0.0478**	**0.0000**	**15.6298**	**15.6298**	**0.0153**	**0.0000**	**16.0121**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.5166					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.1887					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2661	0.1007	8.7063	4.6000e-004		0.0478	0.0478		0.0478	0.0478		15.6298	15.6298	0.0153		16.0121
Total	**3.9713**	**0.1007**	**8.7063**	**4.6000e-004**		**0.0478**	**0.0478**		**0.0478**	**0.0478**	**0.0000**	**15.6298**	**15.6298**	**0.0153**	**0.0000**	**16.0121**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

APPENDIX D

TRAFFIC REPORT

Received by RMA-Planning
on February 12, 2018.

Keith Higgins
Traffic Engineer

RIVERVIEW AT LAS PALMAS SENIOR HOUSING TRAFFIC IMPACT ANALYSIS

ADMINISTRATIVE DRAFT REPORT

MONTEREY COUNTY, CALIFORNIA

Prepared for
Riverview at Las Palmas, LLC
Carmel, CA 93923

Prepared by
Keith Higgins, Traffic Engineer
Gilroy, CA 95020

June 20, 2017

TABLE OF CONTENTS

1 INTRODUCTION 1
1.1 Project Description 1
1.2 Scope of Work 1
1.3 Traffic Operation Evaluation Methodologies and Level of Service Standards 2
1.5 Criteria for Significant Project Impacts 2
1.6 Funding for Transportation Improvements 3

2 EXISTING TRAFFIC CONDITIONS 6
2.1 Existing Roadway Network 6
2.2 Existing Conditions Intersection Operations 6
2.3 Existing Conditions Road Segment Operations 6
2.4 Existing Transit Service 7
2.5 Existing Bicycle Facilities 7

3 PROJECT TRIP GENERATION, DISTRIBUTION, AND ASSIGNMENT 9
3.1 Project Trip Generation 9
3.2 Project Trip Distribution and Assignment 9

4 EXISTING PLUS PROJECT TRAFFIC CONDITIONS 10
4.1 Existing Plus Project Traffic Volumes 10
4.2 Existing Plus Project Conditions Intersection Operations 10
4.3 Existing Plus Project Conditions Road Segment Operations 10

5 CUMULATIVE PLUS PROJECT TRAFFIC CONDITIONS 13
5.1 2030 Cumulative Traffic Volume Forecasts 13
5.2 Cumulative Plus Project Conditions Traffic Volumes 13
5.3 Cumulative Plus Project Conditions Intersection Operations 13
5.4 Cumulative Plus Project Conditions Road Segment Operations 13

6 PROJECT IMPACTS AND MITIGATION MEASURES 14
6.1 Project Impacts and MItigations 14
6.2 Cumulative Impacts and Mitigations 15

EXHIBITS

1. Project Location Map
2. Project Site Plan
3. Study Intersections
4. AM & PM Peak Hour Volumes and Project Trip Assignment
5. Intersection Level of Service Summary Table
6. Project Trip Generation
7. Project Shift Staffing and Hours
8. Project Trip Distribution

APPENDICES

A LOS Descriptions for Signalized Intersections
B Traffic Count Data
C Level of Service Calculation Worksheets

1 INTRODUCTION

This traffic study analyzes the impacts associated with the development of the Riverview at Las Palmas Senior Assisted Living project in Monterey County. **Exhibit 1** shows the location of the proposed project. **Exhibit 2** shows the proposed site plan.

1.1 Project Description

The project is proposed to include 26 senior assisted living units (Casitas), which are expected to have a traffic generation rate similar to typical attached senior housing units. It is also proposed to include 52 beds of assisted care and 48 beds of memory care (similar to a nursing home).

The project is proposed to provide an opportunity for a continuum of care ranging from seniors with lesser needs through providing care for those needing substantial assistance.

1.2 Scope of Work

The study includes the evaluation of the following intersections and road segments:

Intersections:

1. Reservation Road / Highway 68 WB Ramps
2. River Road / Highway 68 EB Ramps
3. Las Palmas Road / River Road

Road Segments:

1. Highway 68 between San Benancio Road and Toro Park Interchange

The study intersections are shown in **Exhibit 3**. Beyond the limits of the study area, the project trips disperse onto various local streets and roads or onto regional facilities. The impact of trips that disperse on the local road network lessens as they move away from the project site. The local intersections included in the analysis were identified as potentially experiencing the greatest impact from the project.

Weekday AM and PM peak hour traffic operations were analyzed for the following conditions:

1. Existing Conditions
2. Existing Plus Project Conditions
3. Cumulative Plus Project Conditions

1.3 Traffic Operation Evaluation Methodologies and Level of Service Standards

Intersection traffic operations were evaluated based on the Level of Service (LOS) concept, and the LOS standard adopted by Monterey County and Caltrans for each intersection. LOS is a qualitative description of an intersection's or road segment's operation, ranging from LOS A to LOS F. Level of service "A" represents free flow un-congested traffic conditions. Level of service "F" represents highly congested traffic conditions with what is commonly considered unacceptable delay to vehicles at intersections. The intermediate levels of service represent incremental levels of congestion and delay between these two extremes. All three study intersections are signalized. LOS descriptions for signalized intersections are included as **Appendix A**.

Intersection traffic operations were evaluated using the Synchro analysis software (Version 9) and *Highway Capacity Manual 2010 (HCM 2010)* methodologies for signalized intersections. Intersection operations are based on the average vehicular delay at the intersection. The average delay is then correlated to a level of service. When analyzing signalized intersections, the overall intersection delay is used to determine LOS.

The study area falls within the jurisdiction of two public agencies, Monterey County and Caltrans. Level of service standards and impact significance criteria adopted by each public agency have been used as appropriate.

For this study, the following level of service thresholds have been used:

1. The County of Monterey LOS "D" standard has been applied to intersections under the jurisdiction of the County of Monterey.

2. The Caltrans level of service standard is the LOS C/D threshold. The Caltrans LOS C/D standard has been applied to state-controlled intersections and road segments.

1.5 Criteria for Significant Project Impacts

According to the California Environmental Quality Act (CEQA) guidelines, a project may have a significant effect on the environment if it would cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system. In accordance with CEQA, specific impact criteria have been applied to the study intersections and road segments to determine if the project specific increase in traffic is substantial in relation to the existing traffic load and capacity of the street system.

The following significance criteria have been applied to the analysis results.

County of Monterey

A significant impact at a signalized study intersection is defined by Monterey County traffic impact study guidelines to occur under the following conditions:

- A significant impact would occur if an intersection operating at LOS A, B, C, or D degrades to E or F. For intersections already operating at unacceptable level E, a significant impact would occur if a project adds 0.01 or more during peak hours to the critical movement's volume-to-capacity ratio. If the intersection is already operating at LOS F, any increase (one vehicle) in the critical movement's volume-to-capacity ratio is considered significant.

Caltrans

Per the "Caltrans Guide for Preparation of Traffic Impact Studies" publication, "Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D" on State highway facilities, however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained." MOE refers to the measures of effectiveness which are used to describe the measures best suited for analyzing State highway facilities.

Caltrans perceives an impact when there is any degradation in the performance measure below the cusp of C/D. If a facility is currently operating at or below LOS D, then any trips added represent a potential impact, and the performance measure should be brought back to predevelopment conditions. While a single trip added to a degraded facility is not usually reflected in the performance measure, Caltrans reserves the ability to consider a single trip as an impact.

1.6 Funding for Transportation Improvements

TAMC Fee and Sales Tax Measure

The Transportation Agency for Monterey County (TAMC) and its member jurisdictions have adopted a county-wide, regional impact fee to cover the costs for studies and construction of many improvements throughout Monterey County. This impact fee, which went into effect on August 27, 2008, is applied to all new development within Monterey County. The governing document for the fee is the *Regional Impact Fee Nexus Study Update* (March 26, 2008) prepared by Kimley-Horn Associates, Inc. *The Regional Impact Fee Nexus Study Update* was updated again in 2013.

In November, 2016 Monterey County voters approved a 30 year, 3/8 cent sales tax measure to fund a broad range of transportation improvements. $50,000,000 has been earmarked for Highway 68 improvements. TAMC is currently conducting corridor studies to identify improvement options and to focus on options that will provide the most significant benefits to residents and the travelling public.

Monterey County Traffic Impact Fee

In August 2006, the City of Salinas and the County of Monterey entered into an agreement known as the Greater Salinas Area Memorandum of Understanding (MOU). As stated in a report dated August 29, 2006 to the Salinas City Council and the Monterey County Board of Supervisors, "The MOU establishes a broad policy framework to govern and facilitate land use decisions in the Greater Salinas Area. The MOU must be viewed in its entirety as it is intended to aid the community, the City, and the County in the mutual goal of achieving orderly, consistent, and reasoned land use determinations in the Greater Salinas Area recognizing the responsibilities of both the County and City to assure orderly development in their respective jurisdictions."

Item #9 in the MOU states "City and County agree to support fees and taxes needed to mitigate the collective impact of new and existing development on the regional transportation system to the extent that the fees and taxes reflect the overall financing program adopted by TAMC".

Item #10 in the MOU states that "City and County agree that the County will develop a County-wide Traffic Impact fee program for the improvement of major County roads in accordance with the County adopted General Plan." The County will consult with TAMC and Monterey County cities in the development of the County fee program. In order to prevent the need for an ad hoc traffic impact fee on developments within the City of Salinas, the County's traffic impact fee program will make the Greater Salinas Area a priority, and the County will attempt to complete a nexus study and hearing process within 18 months of adoption of the County General Plan.

The 2010 Monterey County General Plan, which was adopted October 26, 2010, provides policies to enact the policy framework provided by the MOU. Specifically, the General Plan includes the following policies:

C-1.8 Development proposed in cities and adjacent counties shall be carefully reviewed to assess the proposed development's impact on the County's circulation system. The County, in consultation with TAMC and Monterey County cities shall, within 18 months of adoption of the General Plan, develop a County Traffic Impact fee that addresses Tier 2 impacts of development in cities and unincorporated areas. From the time of adoption of the General Plan until the time of adoption of a County Traffic Impact Fee, the County shall impose an ad hoc fee on its applicants based upon a fair share traffic impact fee study.

C-1.9 All available public and private sources shall be used for the funding of road and highway development, improvement and maintenance.

C-1.10 The County, in coordination with TAMC and other affected agencies, shall continue efforts to improve traffic congestion at critical locations.

C-1.11 In addition to the County Traffic Impact Fee established in Policy C-1.8, the County shall require new development to pay a Regional Traffic Impact Fee developed collaboratively between TAMC, the County, and other local and state agencies to ensure a funding mechanism for regional transportation improvements mitigating Traffic Tier 3 impacts.

To date, a county-wide traffic fee program has yet to be adopted. Monterey County Public representatives recently stated that a draft fee program is complete and they hope to have the fee adopted in the Fall, 2017. However, the County has been assessing fees for the Countywide Traffic Impact fee on an ad hoc basis per the fee program's draft fee schedule.

2 EXISTING TRAFFIC CONDITIONS

This section describes the existing street network relevant to the proposed project and the existing operational traffic conditions.

2.1 Existing Roadway Network

The key roadways in the vicinity of the proposed project include Highway 68, Reservation Road and River Road. These facilities are described below:

Highway 68 (SR 68) connects State Route 1 in Monterey and US 101 in Salinas. It is a 2-lane rural highway with a speed limit of 55 mph between SR 1 and just south of the Portola Drive interchange. Highway 68 is a 4-lane freeway with 65 mph speed limit between the Portola Drive and Spreckels Boulevard interchanges. Highway 68 is a 4-lane divided highway with 55 mph speed limit from the Spreckels Boulevard interchange to Blanco Road in the City of Salinas. Once inside the City of Salinas, SR 68 becomes an arterial along South Main Street and John Street. It serves as a commuter route between Salinas and the Monterey Peninsula, and functions as a scenic tourist route to the Monterey Peninsula.

Reservation Road is a two-lane rural road that connects Highway 68 to the City of Marina. South of Highway 68, Reservation Road becomes **River Road**, which is a 4-lane road from the Highway 68 / Reservation Road interchange to Las Palmas Road. It narrows to 2 lanes just east of Las Palmas Road. The River Road/Las Palmas Road and River Road/Las Palmas Parkway intersections are signalized. River Road provides access to residential neighborhoods. The Highway 68 ramp intersections with Reservation Road and River Road are signalized.

2.2 Existing Conditions Intersection Operations

Weekday AM and PM peak hour turning movement counts at the study intersections were conducted in March and May 2017. The counts were reviewed and, where appropriate, balanced between intersections. The existing conditions peak hour traffic volumes are presented in **Exhibit 4**. Raw traffic count data is included in **Appendix B**.

Synchro 9 was utilized to evaluate existing conditions operational levels of service at the study intersections. The analysis was performed for the weekday AM and PM peak hours using Highway Capacity Manual 2010 (HCM 2010) methodologies.

All the study intersections operate at acceptable levels of service under existing conditions and no improvements are recommended. Intersection levels of service are summarized in **Exhibit 5**. LOS calculation worksheets are included as **Appendix C**.

2.3 Existing Conditions Road Segment Operations

According to the 2010 Monterey County General Plan Environmental Impact Report, River Road currently operateds in 2008 at LOS C (2008 Average Daily Traffic (ADT) of 14,810 and 2016 ADT of 14,100) between Highway 68 and Las Palmas Road and LOS D from las Las Palmas Road to Las Palmas Parkway (2008 ADT of 11,750 and 2016 ADT of 13,000), according to the 2010 Monterey County General Plan Environmental Impact Report. Daily traffic volumes in 2016 are essentially equivalent to 2008. Evening peak hour traffic volumes counted in 2017 for this study totaled 1,492 north of Las Palmas Road and 1,367 south of Las Palmas Road. Evening peak hour volumes generally represent about 10% of the daily total, so they are consistent with the 2016 daily volumes. River Road operates at an These are acceptable levels of service.

Highway 68 has been determined to currently operate at LOS F in the Monterey County 2010 General Plan. The Transportation Agency for Monterey County (TAMC), Caltrans and the County of Monterey are currently conducting a corridor study to investigate improvements to Highway 68, including roundabouts at currently signalized intersections. Measure X, the Transportation Safety & Investment Plan is a sales tax measure that was approved by Monterey County voters in November, 2016. This measure provides $50 million towards Highway 68 improvements for congestion relief and safety improvements. In addition, the TAMC regional development impact fee designates an additional $4 million toward these improvements.

2.4 Existing Transit Service

The primary public transit service in the County of Monterey is the bus service provided by Monterey-Salinas Transit (MST). MST focuses on improving operational conditions through established bus routes and schedules that efficiently meet travel demands, reduce travel times, improve service reliability, and encourage bike-and-ride initiatives. All MST buses are wheelchair accessible and equipped with bike racks. In the vicinity of the project, bus routes are provided along Highway 68. There are no MST bus routes provided along River Road.

2.5 Existing Bicycle Facilities

The County of Monterey has an adopted Bikeway Plan designating routes along roadways that can be used by bicycling commuters and recreational riders for safe access to major employers, shopping centers and schools. Three basic types of bicycle facilities are described below:

1. Bike path (Class I) - A completely separate right-of-way designed for the exclusive use of cyclists and pedestrians, with minimal crossings for motorists.
2. Bike lane (Class II) - A lane on a regular roadway, separated from the motorized vehicle right-of-way by paint striping, designated for the exclusive or semi-exclusive use of bicycles. Bike lanes allow one-way bike travel. Through travel by motor vehicles or pedestrians is prohibited, but crossing by pedestrians and motorists is permitted.

3. Bike route (Class III) - Provides shared use of the roadway with motorists, designated by signs or permanent markings.

Highway 68 and River Road are designated as Cross County Bike Routes on the 2016 Monterey County Bike Map. Both have shoulders that function as bike lanes.

3 PROJECT TRIP GENERATION, DISTRIBUTION, AND ASSIGNMENT

The procedures for generating and assigning project trips to the local road network are described in this section.

3.1 Project Trip Generation

The project is proposed to include 26 senior assisted living units (Casitas), which are expected to have a traffic generation rate similar to typical attached senior housing units. It is also proposed to include 52 beds of assisted care and 48 beds of memory care (for traffic generation purposes, similar to a nursing home). In total, the project is expected to generate about 363 daily trips with 22 during the morning peak hour and 33 during the evening peak hour. This assumes the project operates with peak hour trip generation characteristics similar to a standard project with this mix of senior living uses. The project trip generation estimate is summarized in **Exhibit 6**.

Exhibit 7 shows the proposed project shift staffing and hours. The project is expected to employ a total of about 92.5 staff members over a 24-hour period. The times of shift changes with corresponding employees is also tabulated on this exhibit. The shift changes that are most relevant to project traffic impacts are those that occur near the peak hour of the street and highway system.

As a means of reducing peak hour trip generation, the project proposes to have shift changes occur outside peak travel periods, that is, during the hours of 7am to 9am and 4pm to 6pm. Morning Shifts A and B, Day Shift B and the Evening and Night Shifts all will change outside the two-hour street peak periods. Day Shift A will be the only shift that begins and ends during the morning and evening peak hours, respectively.

Rescheduling the Day Shift A schedule to begin and end outside the street peak period would eliminate 12 inbound trips in the morning peak hour (from Day Shift A) and 12 outbound trips during the evening peak hour. This would result in a net total of 10 morning street peak hour trips and 21 evening street peak hour trips.

3.2 Project Trip Distribution and Assignment

The project's trip distribution based on existing traffic patterns in the study area is shown graphically in **Exhibit 8**. Project trip assignments at the study intersections are shown in **Exhibit 4**. The project will add about 1 morning peak hour trip and 4 evening peak hour trips to the two-lane section of Highway 68 immediately west of the Toro Park interchange. Project traffic will dissipate along the Highway 68 corridor at the many crossroads including Torero Drive, San Benancio Road, Corral de Tierra Road and Laureles Grade, resulting in less than one morning peak hour trip and about two evening peak hour trips west of Laureles Grade. Project traffic will be at or below one peak hour trip west of Highway 218.

4 EXISTING PLUS PROJECT TRAFFIC CONDITIONS

This section describes existing plus project conditions. Traffic related impacts associated with project development are discussed in this section.

4.1 Existing Plus Project Traffic Volumes

The project trip assignments in **Exhibit 4** were added to the existing traffic volumes to estimate existing plus project traffic volumes. Existing plus project traffic volumes for the AM and PM peak hours are also presented in **Exhibit 4**.

4.2 Existing Plus Project Conditions Intersection Operations

All of the study intersections are projected to operate at acceptable levels of service under existing plus project traffic conditions and no improvements are recommended. Intersection levels of service are summarized in **Exhibit 5**. LOS calculation worksheets are included as **Appendix C**. All project impacts at study intersections will be insignificant.

4.3 Existing Plus Project Conditions Road Segment Operations

The project will have no effect on the level of service of River Road between Highway 68 and Las Palmas Parkway.

Project traffic will have no effect on Highway 68 traffic operations. However, Highway 68 has been determined to currently operate at Level of Service F in the Monterey County General Plan. Monterey County and Caltrans consider the addition of a single peak hour trip to be a significant impact. Therefore, the project will have, as determined by Monterey County and Caltrans, a significant impact on the two-lane section of Highway 68 between Toro Park and Highway 218. However, the added trips are imperceptible and insignificant in proportion to the existing traffic volumes.

The project will pay a TAMC fee that will represent the project's fair share contribution toward Highway 68 improvements and improvements on other regional facilities.

With regard to neighborhood street impacts, the project site is located at the end of Woodridge Court. Woodridge Court connects to River Run Road, which connects to Las Palmas Road, which provides access to and from River Road. Woodridge Court, River Run Court are local streets. Las Palmas Road functions as a collector street, providing access to and from the project will add traffic to each of these streets. Las Palmas Road currently carries about 164 morning peak hour and 155 evening peak hour trips. Traffic counts conducted in November, 2013 indicated that Las Palmas Road between River Road and Winding Creek Road carries about 1,837 daily trips. Riverview Court daily traffic totaled 386, for a grand total of 2,223 for the 313 homes in Las Palmas 1. The daily trip generation rate is about 7.1 trips per day per home.

Las Palmas Road has no homes along its frontage. Four perpendicular parking stalls are currently located at the west leg of the Winding Creek Road intersection. Otherwise, there is no parking along this street. Two lane collector streets have a capacity of over 10,000 vehicles per day. It has a width of 40 feet, which corresponds to a secondary street in the Monterey County Standard Details, which has a very conservative threshold of carrying up to 3,000 vehicles per day. Level of Service C (LOS C) was the General Plan policy in effect at the time of the approval of the Las Palmas Specific Plan. This threshold therefore corresponds with LOS C.

Assuming this rate applies to all subareas within La Palmas 1, the daily trip totals for Las Palmas Road between Winding Creek Road and River Run Road is about 1,200. This is 60% below the LOS C capacity normally attributable to collector streets as well as the Monterey County threshold of 3,000 vehicles per day.

River Run Road carries about 950 vehicles per day between Las Palmas Road and Woodbridge Court. River Run Road is a local street. It has a width of 38 feet, which is about midway between a secondary street (40 feet width) with a LOS C threshold of 3,000 and a tertiary street (34 feet width) with a LOS C threshold of 1,000. This section of street could therefore be considered a hybrid with a LOS C threshold of 2,000 vehicles per day. Functionally, it currently provides the sole access to over 130 homes plus the Corey House and the remaining parcel that is the site of the proposed project (earmarked for approximately 40 homes in the original Las Palmas Specific Plan). River Run Road with the buildout of the project site under its original development proposal would be estimated to carry about 1,230 to 1,300 vehicles per day (35% below the LOS C threshold). On that basis, River Run Road will continue to operate at LOS A-B.

A final consideration for River Run Road is a comparison of anticipated traffic volumes with traffic volume thresholds used by nearby municipalities in neighborhood traffic management and traffic calming policies. Monterey County does not have a policy. The City of Salinas recently adopted the “City of Salinas Neighborhood Traffic Management Program,” November, 2008, that states on page 61 that, “If traffic volumes on residential streets are projected to be less than 1,500 vehicles per day (vpd), then no action is needed, nor will it be taken.” The “City of Seaside Traffic Calming Program”, 2011, states on page 7 that streets carrying more than 1,600 vehicles per day are eligible for traffic calming. Volumes under 1,600 vehicles per day are within a reasonable level for a residential street. Both the policies indicate that collector streets are not eligible for traffic calming. The anticipated volume of 1,313 on River Run Road is below the threshold for both policies and would be considered within an acceptable traffic volume for a local residential street.

Woodbridge Court currently does not serve any residences. It has a width of 28 feet, which is similar to a County Loop street. It carries occasional traffic primarily associated with the Corey House and maintenance vehicles. It will carry all of the project’s traffic,

which is expected to total about 363 vehicles per day. This street will carry volumes well within acceptable levels for residential streets.

The table below summarizes existing and existing plus project daily traffic volumes along the access route between the project site and River Road.

Street Name – Segment Limits	**Street Classification & LOS C Threshold**	**No. of Homes Along Frontage**	**Existing ADT and LOS**	**Project ADT**	**Existing Plus Project ADT/LOS**
Las Palmas Rd – River Rd to Winding Creek	Collector/Secondary – 3,000	0	2,223-A	363	2,586–A
Las Palmas Rd – Winding Creek to River Run	Collector/Secondary – 3,000	0	1,200–A	363	1,563–A
River Run Rd – Las Palmas to Woodbridge	Local/an average of Secondary and Tertiary - 2,000	2	950–A	363	1,313-A/B
Woodbridge Ct – River Run to Project	Tertiary - 300	0	0 (nil)–A	363	363–A

Two intersections exist along the project's access route to and from Highway 68.

1. The Las Palmas Road / River Run Road intersection is a T-intersection that is stop-controlled on the Las Palmas Road approach. Traffic volumes are well with an A level of service on both intersecting streets. No capacity or traffic control improvements are currently warranted. The project will add only incrementally to existing volumes. The Las Palmas Homeowners Association should consider adding stop signs on the River Run Road approaches, since these are the lower volume approaches. This would give equal right-of-way priority to the Las Palmas Road approach, which carries the highest volume of the three approaches.

2. The River Run Road / Woodbridge Court intersection has stop control on the River Run Road approach. This is the highest volume approach at the intersection. The Las Palmas Homeowners Association should consider adding stop control on the Woodbridge Court approach to control traffic exiting from the Project. All-way stop control should also be considered.

The above stop-sign additions are not required as mitigations because the project does not create an impact at these intersections. They are only recommendations that would provide more clarity regarding right-of-way prioritization.

5 CUMULATIVE PLUS PROJECT TRAFFIC CONDITIONS

This section describes the analysis and results for 2030 cumulative conditions.

5.1 2030 Cumulative Traffic Volume Forecasts

Future traffic growth projections for the study area were derived based on 2030 traffic volume projections within the Monterey County 2010 General Plan. A growth rate of 15% was applied to the existing traffic volumes to estimate 2030 cumulative traffic volumes. This is more conservative than the projections developed for Highway 68 in the *State Route 68 Scenic Highway Plan* being prepared by Kimley-Horn, which were based on the Fort Ord Reuse Authority (FORA) travel demand model that projected slightly less than 10% growth along the Highway 68 corridor between the years 2016 and 2035.

5.2 Cumulative Plus Project Conditions Traffic Volumes

The trips generated by the proposed project were added to the 2030 cumulative traffic volumes to obtain the cumulative plus project AM and PM peak hour traffic volumes shown in **Exhibit 4**.

5.3 Cumulative Plus Project Conditions Intersection Operations

Two study intersections are projected to operate at unacceptable levels of service under cumulative plus traffic conditions. Intersection levels of service are summarized in **Exhibit 5**. LOS calculation worksheets are included as **Appendix C**.

1. The Reservation Road / Highway 68 WB Ramp intersection is projected to operate at an unacceptable LOS D during the PM peak hour under cumulative plus project traffic conditions.

2. The River Road / Highway 68 EB Ramp intersection is projected to operate at an unacceptable LOS D during the AM peak hour under cumulative plus project traffic conditions.

5.4 Cumulative Plus Project Conditions Road Segment Operations

River Road is expected to continue to operate at LOS C between Highway 68 and Las Palmas Road and LOS D from Las Palmas Road to Las Palmas Parkway under 2030 Cumulative Conditions, according to the 2010 Monterey County General Plan Environmental Impact Report. These are acceptable levels of service.

As previously stated, Highway 68 has been determined to currently operate at LOS F in the Monterey County 2010 General Plan. The projected 10% increase in traffic volumes under cumulative conditions would exacerbate these conditions.

6 PROJECT IMPACTS AND MITIGATION MEASURES

6.1 Project Impacts and Mitigations

a. Project Impacts

All the study intersections are projected to operate at acceptable levels of service under existing plus project traffic conditions and no improvements are required.

Project traffic will have no effect on Highway 68 traffic operations. However, Highway 68 has been determined to currently operate at Level of Service F in the Monterey County General Plan. Monterey County and Caltrans consider the addition of a single peak hour trip to be a significant impact. Therefore, the project will have a significant impact on the two-lane section of Highway 68 between Toro Park and Highway 218. As discussed in the Existing Plus Project Conditions section of this report, TAMC, Caltrans and Monterey County have funding and are studying a variety of operational improvements along the corridor.

b. Project Mitigations

The project will pay regional traffic impact fees that will be able to be applied toward these improvements. Nevertheless, the project will not directly implementany improvements to offset its impacts. It will, therefore, have an unmitigated significant impact on Highway 68.

6.2 Cumulative Impacts and Mitigations

a. Cumulative Impacts

The following study facilities are projected to operate at unacceptable levels of service under cumulative plus traffic conditions.

1. The Reservation Road / Highway 68 WB Ramp intersection is projected to operate at an unacceptable LOS D during the PM peak hour.

2. The River Road / Highway 68 EB Ramp intersection is projected to operate at an unacceptable LOS D during the AM peak hour.

3. Highway 68 is projected to operate at LOS F under cumulative traffic conditions.

The proposed project will contribute to incremental increases in traffic volumes at these locations and will therefore contribute to a significant cumulative impact. The project will add only incrementally to this cumulative impact and should pay a proportionate share of the cost of mitigation.

6.2 Cumulative Mitigations

1. The following improvements would result in acceptable levels of service at the study intersections Impacts 1 and 2). These options both appear to be feasible. They will require Monterey County and Caltrans to evaluate the pros and cons of each alternative.

   Mitigation Option 1: Add a dedicated southbound right-turn lane at the Reservation Road / Highway 68 WB Ramps intersection and a second southbound left-turn lane at the River Road / Highway 68 EB Ramps intersection, or;
   Mitigation Option 2: Convert the Reservation Road / Highway 68 WB Ramps and River Road / Highway 68 EB Ramps intersections to roundabouts. A roundabout appears to be able to be implemented with no physical constrains at the EB Ramp intersection. However, the WB Ramp intersection would require right-of-way acquisition and construction that would be very close to existing office buildings on the northeast and northwest corners of the intersection. Special attention to this issue would need to be made when evaluating the feasibility of this alternative.

2. TAMC, Caltrans and Monterey County are evaluating operational improvements to Highway 68 as described in "Section 2.3 Existing Conditions Road Segment Operations," of this report. The project will pay TAMC Regional Development Fees, which will represent its fair-share contribution to this improvement.

3. The project will be required to pay TAMC and County of Monterey traffic impact fees, which will mitigate its share of cumulative impacts.

APPENDIX E

CAL WATER CAN AND WILL SERVE LETTER

CALIFORNIA WATER SERVICE
Salinas District 254 Commission Street, Salinas, CA 93901-3737
Tel: (831) 757-3644

August 27, 2015

Dale Ellis
Anthony Lombardo & Associates
144 West Gabilan Street
Salinas, CA 93901

Will Serve Letter
Tract or Parcel Map No: Riverview at Las Palmas
Developer: *Anthony Lombardo & Associates*

Dear Mr. Ellis:

California Water Service Company Salinas district ("Cal Water") has determined that water is available to serve the above-referenced project based on the information provided. Cal Water agrees to operate the water system and provide service in accordance with the rules and regulations of the California Public Utilities Commission (CPUC) and the company's approved tariffs on file with the CPUC. This determination of water availability shall remain valid for **two years** from the date of this letter. If construction of the project has not commenced within this **two year** time frame, Cal Water will be under no further obligation to serve the project unless the developer receives an updated letter from Cal Water reconfirming water availability. Additionally, Cal Water reserves the right to rescind this letter at any time in the event its water supply is severely reduced by legislative, regulatory or environmental actions.

Cal Water will provide such potable water at such pressure as may be available from time to time as a result of its normal operations per the company's tariffs on file with the CPUC. Installation of facilities through developer funding shall be made in accordance with the current rules and regulations of the CPUC including, among others, Tariff Rules 15 and 16 and General Order 103-A. In order for us to provide adequate water for domestic use as well as fire service protection, it may be necessary for the developer to fund the cost of special facilities, such as but not limited to booster pumps and storage tanks, in addition to the cost of mains and services. Cal Water will provide more specific information regarding special facilities and fees after you provide us with your improvement plans, fire department requirements, and engineering fees for this project.

CALIFORNIA WATER SERVICE

This letter shall at all times be subject to such changes or modifications by the CPUC as said Commission may, from time to time, require in the exercise of its jurisdiction.

If you have any questions regarding the above, please call me at (831) 757-3644.

Sincerely,

Mike Jones
District Manager

cc: Ting He – Cal Water Engineering Dept
File

APPENDIX F

LANDSET GEOTECHNICAL REPORT

LANDSET
ENGINEERS, INC.
ENGINEERING - LAND PLANNING
SURVEYING - ENVIRONMENTAL CONSULTING

GEOLOGIC HAZARDS REPORT
AND
SOIL ENGINEERING FEASIBILTY INVESTIGATION
FOR
RIVER VIEW AT LAS PALMAS
(APN 139-211-035)
END OF WOODRIDGE COURT
MONTEREY COUNTY, CALIFORNIA

PROJECT 1272-01

Prepared for

RIVER VIEW AT LAS PALMAS, LLC
C/O ANTHONY LOMBARDO & ASSOCIATES
450 LINCOLN AVENUE
SALINAS, CALIFORNIA 93901

Prepared by

LANDSET ENGINEERS, INC.
520B CRAZY HORSE CANYON ROAD
SALINAS, CALIFORNIA 93907
(831) 443-6970

MARCH 2014

LANDSET
ENGINEERS, INC.
ENGINEERING - LAND PLANNING
SURVEYING - ENVIRONMENTAL CONSULTING

March 7, 2014 File No.: 1272-01

Mr. Garrett Shingu
River View at Las Palmas, LLC
c/o Anthony Lombardo & Associates
450 Lincoln Avenue, Suite 101
Salinas, California 93901

Attention: Mr. Dale Ellis

SUBJECT: **GEOLOGIC HAZARDS REPORT & SOILS ENGINEERING FEASIBILITY INVESTIGTION**
River View at Las Palmas (APN 139-211-035)
End of Woodridge Court
Las Palmas Ranch Area, Monterey County

Dear Mr. Shingu:
In accordance with your authorization, Landset Engineers, Inc. has completed a geologic hazards report and soil-engineering feasibility investigation for the proposed River View at Las Palmas senior housing development located at the end of Woodridge Court in the Las Palmas Ranch area, Monterey County, California. This report presents the results of our field investigation, laboratory testing, along with our preliminary conclusions and recommendations for site development.

It is our opinion that the proposed development is feasible from a geologic and soil engineering standpoint. The recommendations included in this report are preliminary and contingent upon further design development. *It is recommended that an additional design level soil engineering investigation should be performed once preliminary development plans have been completed and locations & types of structures, and anticipated loads are known.* The conclusions and recommendations included herein are based upon applicable standards at the time this report was prepared.

It has been a pleasure to be of service to you on this project. If you have any questions regarding the attached report, please contact the undersigned at (831) 443-6970.

Respectfully submitted,
LandSet Engineers, Inc.

PROFESSIONAL GEOLOGIST
BRIAN E. PAPURELLO
No. CEG 2226
CERTIFIED ENGINEERING GEOLOGIST
STATE OF CALIFORNIA

Brian E. Papurello
CEG 2226

REGISTERED PROFESSIONAL ENGINEER
GUY R. GIRAUDO
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EXP. 6/30/15
CIVIL
STATE OF CALIFORNIA

3/7/14

Guy R. Giraudo
RCE 56569

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TABLE OF CONTENTS

Page

INTRODUCTION....1
PURPOSE AND SCOPE OF SERVICES....2
Geologic Hazards Report....2
Soil Engineering Feasibility Investigation....3
SITE DESCRIPTION AND PROPOSED DEVELOPMENT....3
FIELD EXPLORATION....4
LABORATORY TESTING....5
REGIONAL GEOLOGY....6
REGIONAL FAULTING AND SEISMICITY....7
San Andreas fault....7
Rinconada-Reliz fault....8
Monterey Bay-Tularcitos fault....8
Zayante-Vergeles fault....9
San Gregorio fault....9
SITE GEOLOGY....10
(Af) Artificial fill (Holocene)....11
(Qc) Colluvium (Holocene)....11
(Qls) Landslide deposits (Quaternary)....12
(Qt) Terrace deposits (Pleistocene)....12
(Qtc) Continental deposits (Pleistocene-Pliocene (?))....12
Site Geologic Structure and Faulting....12
Landsliding....14
SUBSURFACE CONDITIONS....14
GROUNDWATER....14
CONCLUSIONS....15
Seismic Hazards....15
Surface Fault Rupture....15
Historical Earthquakes....15
Ground Shaking....18
Seismic Design Parameters....18
Liquefaction, Lateral Spreading, and Dynamic Compaction....19
Ridge-Top Shattering....19
Landsliding and Slope Stability....19
Grading....20
Soil Expansion....20
Erosion....20

TABLE OF CONTENTS (Continued)

	Page
RECOMMENDATIONS	21
Geologic	21
Soil Engineering	22
Site Preparation and Grading	22
Foundations	25
Slabs-on-Grade and Exterior Flatwork	27
Retaining Walls	28
Utility Trenches	30
Site Drainage	30
QUALITY CONTROL	32
LIMITATIONS AND UNIFORMITY OF CONDITIONS	33
REFERENCES	34
AERIAL PHOTOGRAPH REFERENCES	37

FIGURES

Figure 1, Vicinity Map
Figure 2, Regional Geologic Map
Figure 3, Geologic Vicinity Map
Figure 4, Explanation to Geologic Vicinity Map
Figure 5, Regional Fault and Seismicity Map

APPENDIX A

Unified Soil Classification System	A1
Soil Terminology	A2
Logs of Exploratory Test Pits TP-1 through TP-13	A3-A4

APPENDIX B

Laboratory Test Results, Table B1	B1-B3

MAP POCKET

Sheet 1, Site Geologic Map
Sheet 2, Geologic Cross Sections A-A', B-B' & C-C'

INTRODUCTION

This report summarizes the findings, conclusions, and recommendations for our geologic hazards report and soil engineering feasibility investigation for the River View at Las Palmas senior housing development (hereafter referred to as the site) located at the end of Woodridge Court in the Las Palmas Ranch area, Monterey County, California (see Vicinity Map, Figure 1).

PURPOSE AND SCOPE OF SERVICES

Geologic Hazards Report. This report addresses the feasibility of the development for the site from a geologic viewpoint, with emphasis on the potential for geologic and seismic-related hazards. Our studies included the following:

A. Research, review, and evaluation of data from relevant reports and maps.

B. Examination and interpretation of four sets of stereo aerial photographs of the area.

C. Geological site reconnaissance.

D. Geologic mapping of the subject property based on our site reconnaissance and review of aerial photographs and maps.

E. Development of a site geologic map and geologic cross-sections

F. Analysis of the data generated from by a certified engineering geologist and preparation of a written report in accordance with the California Geological Survey guidelines. The report addresses the following:

- *Site geology*
- *Faulting*
- *Liquefaction Potential*
- *Landsliding & Slope Stability*
- *Ground Shaking*
- *Erosion*
- *Geologically Suitable Building Envelope*

Soils Engineering Feasibility Investigation. The soil engineering feasibility investigation has been prepared to explore surface and subsurface soil and groundwater conditions at the site, and provide preliminary soil-engineering criteria for design and construction of the project.

The conclusions and recommendations of this report are intended to comply with Chapter 18 of the California Building Code (CBC) 2013 edition as modified by standard soil engineering practice in this area. Our scope of services included:

1. A visual site reconnaissance.
2. Exploration, sampling and classification of the surface and subsurface soils by means of excavating 13 exploratory test pits to depths ranging from 3.0 to 12.5 feet below the ground surface.
3. Laboratory testing of selected soil samples collected from the exploratory test pits and to determine their pertinent engineering and index properties.
4. Engineering analysis of the information collected based on the results of the field exploration; laboratory testing program and review of published and unpublished studies in the general area of the site.
5. Preparation of this report summarizing our preliminary findings and soil engineering conclusions and recommendations for site preparations, grading and compaction, foundations, retaining walls, utility trenches, slabs-on-grade, general site drainage, and erosion control.

SITE DESCRIPTION AND PROPOSED DEVELOPMENT

The center of the site is located at approximate 36.6205° N latitude, 121.6739° W longitude in the northwest quarter of the northeast quadrant of the Spreckels 7.5 minute quadrangle, Monterey County, California. The site is unsectionized and remains part of the Buena Vista Mexican Land Grant. Surrounding land uses are residential and agricultural (Figure 1, Vicinity Map).

The site (APN 139-211-035) consists of an approximate 15.67-acre irregular shaped parcel located at the end of Woodridge Court in the Las Palmas Ranch area of Monterey County, California. Ingress/egress to the site is from and unpaved road located at the end of Woodridge Court (Sheet 1). Topographically, the site is situated on a northeast-southwest trending ridge,

bounded by moderate to very steep descending slopes (Figure1). The northeasterly two-thirds of the site is situated on a relatively flat uplifted fluvial terrace with slope gradients ranging from ~5% to 10% (Sheet 1). The terrace area is bounded by steep to very steep northerly, southerly and easterly facing descending slopes with gradients ranging from 50% to 70%. The southwesterly one-third of the site consists of a hilly upland area with 15% to 25% slopes. Overall topographic relief in the proposed development area is about 150 feet (Sheet 1). The site is bounded by agricultural ranch lands to the north, east & west and the Las Palmas Ranch residential development to the south. Vegetative cover consists of a dense eucalyptus grove with scattered cypress trees on the terrace and upland areas. The northerly slopes are covered with a dense oak forest, while the southerly slopes are covered with scattered trees, brush and grasses. Drainage of the site is generally southwest to northeast via sheet flow.

As previously noted, access to the site is from an existing graded dirt driveway off of Woodridge Court at the southeasterly corner of the site (Sheet 1). Other existing site improvements consist of the following: storm drain inlet pipe and electrical vaults at the southeasterly property corner; two cribwall type retaining walls near the westerly end of the access drive; and a reclaimed water irrigation distribution system for the flat northeasterly two-thirds of the site. No records were available for our review such as plans, permits, etc. with respect to the construction of these improvements. Three landslide stabilization walls are located on the steep southeasterly descending slope located near the southwesterly corner of the site. These walls were constructed in the early to mid-1990's in response to the reactivation of an existing landslide (Qls, Sheet 1) located in this area.

During our site reconnaissance and field exploration we also noted that the site has been modified by other past grading activities. Areas of undocumented fill (designated as Af, Sheet 1) were noted to occur on the site. The most notable is a significant trash fill pit located in the south central portion of the site (TP-5, Figure A3 & TP-13, Figure A4). The materials consisted of substantial quantities of decomposing tree branches and limbs extending to a depth of 10.5 feet below the ground surface. It also appears that the most southerly limits of the flat terrace area has

been bermed in order to limit the potential of site surface drainage from freely flowing over the steep southeasterly descending slopes adjacent to the Las Palmas ranch residential development.

Proposed future site development will consist of a new senior housing residential development composed of 26 independent living units, 24 assisted living apartments, 48 high level assisted living units and a 24 bed memory care facility. Additional development will consist of new vehicular drives and parking along with associated underground utility infrastructure improvements.

FIELD EXPLORATION

The site was mapped in the field on January 31 and February 25, 2014 on a base topographic map at a scale of 1:600. Additional mapping was done on aerial photographs at an approximate scale of 1:12,000. The field and aerial photograph mapping was then compiled on a topographic base map of 1:600 approximate scale (Site Geologic Map and Cross Sections, Sheets 1 & 2).

As part of our soil engineering feasibility investigation, 13 exploratory test pits were excavated on January 31, 2014 at the approximate locations shown on the Site Geologic Map, Sheet 1. The test pits were excavated with a rubber tired backhoe, equipped with a 24-inch wide bucket. The exploratory test pits were excavated to depths ranging from 3.0 to 12.5-feet below the ground surface. A Certified Engineering Geologist logged the exploratory test pits in the field. Upon completion of trenching, the test pits were backfilled with the previously excavated trench spoils.

Soils encountered in the exploratory test pits were visually classified in the field and logs were recorded. Visual classifications were made in general accordance with the Unified Soil Classification System and ASTM D2487. Logs of the exploratory test pits can be found in Appendix A (Figures A3 & A4). Appendix A also contains a Key to the Unified Soil Classification System and Soil Terminology (Figures A1 and A2).

LABORATORY TESTING

Laboratory tests were performed to determine the physical and engineering characteristics on selected soil samples of the various soil materials encountered in the exploratory test pits considered pertinent to the design of the project. The tests performed were selected on the basis of the probable design requirements as correlated to the site subsurface profile. A summary of the laboratory test results is presented in Appendix B. A brief generalized description of the tests performed is as follows.

- Moisture-Density Determinations: This test was conducted to measure the in-situ moisture contents and dry unit weights. Moisture/density testing was performed in accordance with ASTM D 2922 and ASTM D 3017, Nuclear Test Method. The test results are used to assess the distribution of subsurface pressures and to calculate degrees of in-situ relative compaction.

- Atterberg Limits: This test was performed on a disturbed bulk samples, to determine their liquid limit and plastic limit index values. This test provides water content values for the sample's liquid and plastic phases. This test aids in determining the expansive potential and other engineering characteristics of the soil.

- Grain Size Distribution (Gradation) Analysis: The grain size distribution is used to determine the classification of the site soils. This information is used for foundation design analysis.

- Compaction Curve (ASTM D 1557-91): This test is used to determine the maximum dry density and optimum moisture content based upon a standard compactive effort. When compared to the insitu moistures and densities, degrees of relative compaction can be obtained.

REGIONAL GEOLOGY

The site is situated on the south side of the Salinas River, at the northern terminus of the Sierra de Salinas within the Coast Ranges Geomorphic Province of California (Figure 2, Regional Geologic Map). The Coast Ranges Geomorphic Province consists of a series of mountain ranges paralleling the northwest-southeast structural orientation of the San Andreas fault, San Gregorio-Palo Colorado fault, Rinconada-Reliz fault and other faults within the central coast of California (Figure 5, Regional Fault and Seismicity Map). These faults are characterized by a combination of strike-slip and reverse displacement and show horizontal displacements from tens to hundreds of miles. Several periods of continuous and semi-continuous strike-slip or "transform" movement throughout the late Cenozoic Era has occurred on the San Andreas and related fault systems causing compressional uplift of the mountains of the Coast Ranges Geomorphic Province. The region continues to be characterized by moderate to high rates of seismic and tectonic activity (Figure 5).

The site is located on the southwest side of the San Andreas fault. The San Andreas fault forms the boundary between the North American and Pacific Plates. The southwest side of the San Andreas fault is underlain by Cretaceous age Salinian Block granitic rocks with older Sur Series metamorphic rocks that occur as roof pendants (Allen, 1946 & Dibblee, 1974). These roof pendants predominantly consist of marble and dolomite (Compton, 1966). Overlying the granitic rocks of the Salinian Block is a series of folded and faulted Tertiary age sedimentary and volcanic rocks (Dibblee, 1974).

During early to late Quaternary times, extensive continental, marine terrace, eolian, and fluvial sediments were deposited (Dupre' 1990, Clark Brabb & Rosenberg 2000). These sediments unconformably overlie all older formations with which they are in contact. Holocene activity has consisted of continued tectonic uplift, down cutting and deposition of the local area streams, mass wasting of upland areas by landslides and erosion, and fault creep along the San Andreas and related fault systems. The geology of the site and vicinity is depicted on the Geologic Vicinity Map, Figure 3.

REGIONAL FAULTING AND SEISMICITY

The closest Class A faults that would most likely effect the site are the San Andreas, Rinconda-Reliz, Monterey Bay, Zayante-Vergeles and San Gregorio faults (Figure 5). These faults have shown evidence for late Quaternary movement. Distance from the site, slip rate, and maximum magnitude for these faults is given in Table 1.

Table 1
Local and Regional Faults

Fault Name	Distance From Site	Maximum Magnitude	Slip Rate mm/year
San Andreas	**26.5-km Northeast**	**7.9**	**>5.0**
Rinconada-Reliz	**300 feet Northeast**	**7.3**	**0.2 – 1.0**
Monterey Bay	**14-km Southwest**	**6.8**	**1.0 – 5.0**
Zayante-Vergeles	**23-km Northeast**	**6.8**	**0.2 -1.0**
San Gregorio	**30-km Southwest**	**7.0**	**1.0 – 5.0**

San Andreas Fault

The San Andreas fault is located about 26.5 km. northeast of the site and is the major seismic hazard in northern California. The San Andreas fault is a major right-lateral strike-slip fault that generally delineates the transform plate boundary between the North American and Pacific Plates. Trending to the northwest southeast, the San Andreas fault is nearly vertical as evidenced by the relatively straight outcrop pattern across topography of noticeable relief. Historic earthquakes on the San Andreas fault have caused extensive damage and very strong ground shaking in Monterey County. The 1906 (M_w~8.0) "San Francisco earthquake" ruptured a portion of the active San Andreas fault from approximately San Juan Bautista to Cape Mendocino, causing severe damage in parts of the Monterey-San Francisco Bay area. The earthquake occurred on April 18, 1906 and caused severe ground shaking and structural damage to buildings in Monterey, Santa Cruz and San Benito Counties (Lawson, 1908). The 1989 (M_w 7.1) Loma Prieta earthquake also caused significant damage in the cities of Salinas, Santa Cruz, Watsonville, and Hollister (McCann, 1990).

The San Andreas fault has been divided into several different segments that are characterized by varying slip rates, earthquake intensities, and earthquake recurrence intervals (Bryant and Lundberg, 2002). Located about 26.5 km. northeast of the site, the San Andreas fault can expect a (M6.8) earthquake with an unknown recurrence interval (Petersen et al, 1996). Stronger earthquakes could be experienced at the site similar to the 1906 event with a maximum magnitude of (M7.9) with a recurrence interval of 210 years (Petersen et al, 1996).

Rinconada-Reliz Fault

The Rinconada-Reliz fault is primarily a right lateral strike slip and reverse fault zone (Petersen et al, 1996) with a vertical component having elevated the southwest block to form the Sierra de Salinas uplift (Dibblee, 1976). The Reliz fault zone, Blanco section is located about 300 feet northeast of the site (Rosenberg & Bryant, 286a & 286b, 2003, Rosenberg & Clark, 2009). The Rinconada-Reliz fault is a major structural feature along which granitic rocks of the Sierra de Salinas were uplifted to form the western border of the Salinas Valley (Greene et al, 1973) with movement beginning during early Cenozoic time and has remained active to late Quaternary (Rosenberg & Bryant, 286a & 286b, 2003). Vertical displacement in the Sierra de Salinas may be as much as 10,000 feet (Dibblee, 1976). Slip rate for the Rinconada fault is estimated at 0.2 to 1.0mm/yr. Maximum magnitude is expected to be (M7.3) with a recurrence interval of 1,764 years (Petersen et al, 1996).

Monterey Bay-Tularcitos Fault

Located about 14-km southwest of the site, the Monterey Bay-Tularcitos fault zone is a complex series of northwest trending reverse, right lateral, and oblique faults which include the Tularcitos, Chupines, and Navy faults (Bryant 62b & 62c, 2001). The Monterey Bay-Tularcitos fault zone lies within a fault bounded wedge of granitic basement rocks belonging to the Salinian block and is bounded on the west by the San Gregorio fault and on the east by the San Andreas fault (McKittrick, 1987). The Monterey Bay-Tularcitos fault is 84 km. long (Petersen et al, 1996) and extends from Paloma Creek in upper Carmel Valley (Clark et al, 1997) to the offshore environment within the Monterey Bay. Post Miocene vertical displacement of the Tularcitos fault

is about 380 m and 3.2km to as much as 16 km of right lateral displacement (Clark et al, 1997). Offsets of Holocene age colluvial and fluvial terrace deposits indicates that the Tularcitos fault is active (Clark et al, 1997). The Monterey Bay fault is the offshore extension of the Tularcitos fault and comprises a discontinuous series of en echelon faults in the inner Monterey Bay between Monterey and Santa Cruz (Greene et al, 1973). The Monterey Bay fault zone displaces late Tertiary and Pleistocene sediments and in a few locations appears to cut Holocene sediments (Greene et al, 1973). Slip rate for the Monterey Bay-Tularcitos fault is estimated at 0.5mm/yr. Maximum magnitude is expected to be (M7.1) with a recurrence interval of 2,841 years (Petersen et al, 1996).

Zayante-Vergeles Fault

The Zayante-Vergeles fault is located about 23-km northeast of the site (Coppersmith, 1979). The Zayante-Vergeles fault is a right-lateral reverse fault (Petersen et al, 1996) dipping steeply to the south (70°-80°) with a minimum vertical displacement of 3,500 feet (Allen, 1946). No Tertiary sediments are found on the uplifted Salinian Block granite south of the fault, as they have been completely eroded. Two branches of the Vergeles fault break of the main fault trace at low angles to form "splinters", which duplicates portions of the Miocene rock record (Allen, 1946). Initial movement on this fault probably began in the middle Miocene corresponding with the deposition of the Zayante Sandstone. Movement on this fault was probably sporadic through late Pliocene (Allen, 1946). More recent studies suggest that the Zayante fault (the western extension of the Vergeles fault) has at least 10-17 meters of vertical displacement in the last 500,000 years (Coppersmith, 1979). Slip rate for the Zayante-Vergeles fault is estimated at 0.2 to 1.0mm/yr. (Bryant, 2000). Maximum magnitude is expected to be (M6.8) with a recurrence interval of 8,821 years (Petersen et al, 1996).

San Gregorio Fault

Like the San Andreas fault, the San Gregorio fault has been divided into several different segments that are characterized by varying slip rates, earthquake intensities, and earthquake recurrence intervals. Located about 44 km southwest of the site, the San Gregorio (Sur region) is

a northwest trending right lateral strike slip fault about 80 km long (Petersen et al, 1996). The San Gregorio fault is part of the San Andreas fault system and is expressed as a complex series of en echelon right lateral strike slip faults (San Gregorio, Palo Colorado, San Simeon, & Hosgri faults) in the offshore and near shore environments. The San Gregorio and related faults are several hundred kilometers long extending from the Santa Barbara Channel in the south, to its juncture with the San Andreas fault near Bolinas Bay in the north. Strong evidence supports that the San Gregorio fault (Sur region) has been active during Holocene time (Greene et al, 1973). Slip rate for the San Gregorio fault (Sur region) is estimated at >5.0mm/yr. (Bryant and Cluett, 1999). Maximum magnitude is expected to be (M7.0) with a recurrence interval of 411 years (Petersen et al, 1996).

SITE GEOLOGY

Previous published & unpublished mapping of the site and its vicinity has been performed by Dibblee, 1974; Dupre', 1990 and Clark, Brabb & Rosenberg, 2000. Dibblee, 1974 mapped the site at a scale of 1:62,500, and as being underlain entirely by Quaternary older alluvium. Mapping performed by Dibblee did not indicate the presence of faults or landslides to occur on the site.

More recent mapping of the site and vicinity was performed by Dupre', 1990 at a scale of 1:24,000. This mapping concentrates on Quaternary geology and liquefaction potential. Dupre' has mapped the northeasterly portion of site as being underlain by Pleistocene age fluvial terrace deposits. The upland southwesterly portion of the site has been mapped as Plio?-Pleistocene age Non-marine continental deposits. Dupre' also maps a landslide in the area of the southwesterly corner of the site. No faults were noted to occur, or were mapped on the site.

Clark, Brabb & Rosenberg, 2000 have performed the most recent and detailed published geologic mapping of the site and vicinity at a scale of 1:24,000 (Figure 3). Clark, Brabb and Rosenberg map the flatter northeasterly portion of the site as being underlain by a veneer of Pleistocene age fluvial terrace deposits, which are underlain by Plio?-Pleistocene age continental deposits. The

southwesterly upland portion of the site has been mapped as Plio?-Pleistocene age continental deposits dipping to the northeast. Review of this most recent mapping indicates the presence of a large landslide located in the southwesterly portion of the site that extends offsite to the south. No faults were mapped on the site.

Geology for this report was mapped in the field on January 31 and February 25, 2014. Field mapping was done on aerial photographs at an approximate scale of 1:12,000, and on a base topographic map at a scale of 1:600. The field mapping work was then compiled on a topographic base map of 1:600 scale (Site Geologic Map & Cross Sections, Sheets 1 & 2). As part of our geologic mapping we examined and interpreted of four sets of stereo aerial photographs of the area taken in 1956, 1978 & 1994 of the site and its vicinity. These photographs were scrutinized for site geology, terrain features characteristic of active fault zones, and for landsliding features. Based on the above referenced techniques and our exploratory trenching program, it is our opinion that the geology as mapped by Clark, Brabb & Rosenberg, 2000 is reasonably accurate. Description of the site geology is as follows, refer to Site Geologic Map and Geologic Cross Sections (Sheets 1 & 2) located in the map pocket at the back of this report for the location and distribution of these units.

(Af) Artificial Fill (Holocene): As previously noted in this report, man-made deposits of fill and trash fill are located on the site. The most significant of the features is located in the south central portion of the site in the areas of exploratory test pits TP-5 & TP-13. The materials encountered consist of substantial quantities of decomposing tree branches and limbs extending to a depth of 10.5 feet below the ground surface. *Areas of undocumented fill must be remediated prior to building development and foundation construction.*

(Qc) Colluvium (Holocene): Colluvial deposits have been mapped on the steep southerly slopes of the site adjacent to the Las Palmas Ranch residential development. These Holocene age deposits consist of unconsolidated silt, sand and gravel eroded off of the upland areas deposited by slope wash and mass movement.

(Qls) Landslide deposits (Quaternary): Evidence for landsliding was found to flank both sides of the ridge that trends northeast-southwest through the property. The landslides consist of heterogeneous deposits ranging from block slides to earthflows in weakly to semi-consolidated sand and clay.

(Qt) Terrace deposits (Pleistocene): The northeasterly two-thirds of the site has been mapped as Pleistocene age terrace deposits. These sediments consist of weakly consolidated silt, sand and gravel deposited in a fluvial (river) environment.

(Qtc) Continental deposits (Pleistocene-Pliocene (?)): The surface of the upland areas in the southwesterly one-third of the site have been mapped as Pleistocene-Pliocene (?) age continental deposits which are in conformable contact with the younger overlying terrace deposits. These sediments were also noted to crop out on the steep slopes on the southerly flank of the site. The continental deposits consist of nonmarine consolidated fine to coarse grained sand with pebble and cobble/gravel interbeds.

Site Geologic Structure and Faulting

Bedding inclinations near the site indicate that the Continental deposits are dipping 30 to 35° to the northeast (Clark, Brabb, & Rosenberg, 2000). No structural axis (anticlinal or synclinal) has been mapped underlying site.

The closest Class A fault to the site is the Blanco section of the Reliz fault located approximately 300 feet northeast of the site (Rosenberg & Bryant, 2003, Rosenberg & Clark, 2009). Though the site is not located within an Earthquake Fault Zone as established by the State of California, the Rinconada-Reliz fault has displayed late Pleistocene and probable early Holocene displacement to be classified as significant seismic hazard.

Other faults in proximity to the site are the Las Palmas and Harper faults (Figure 3) which are classified as Class B faults by the U.S. Geological Survey Geologic Survey. Class B faults demonstrate the existence of Quaternary deformation, but either (1) the fault might not extend

deeply enough to be a potential source of significant earthquakes, or (2) the currently available geologic evidence is too strong to confidently assign the feature to Class C but not strong enough to assign it to Class A. These faults have not displayed substantial rates of displacement to be classified as significant seismic hazards. However, based on evidence of late Quaternary activity and proximity to the site a discussion of these faults is as follows.

Las Palmas Fault

Located about 2.1-km. southeast of the site, the Las Palmas fault strikes northwest along the foothills south of the Salinas River. Its mapped trace is marked by aligned springs, local offset of Pleistocene-Pliocene(?) continental deposits and a pronounced gravity gradient (Clark, Brabb & Rosenberg, 2000, Rosenberg & Clark, 2009). The parallel orientation and sense of displacement suggest that the Las Palmas fault is probably a branch of the Reliz fault zone (Rosenberg & Clark, 2009). The offset of the continental deposits support the conclusion that a continuous zone of faulting younger than 250-550 ka cannot be demonstrated (Rosenberg & Clark, (2009).

Harper Fault

Located about 1.0-km. west of the site, the Harper fault is a north striking reverse fault that juxtapose Cretaceous age granitic rocks against Pliocene(?)-Pleistocene age continental deposits. Although the Harper fault locally truncates the continental deposits, there is no documented evidence of Holocene activity along this fault.

Landsliding

Evidence for landsliding was found to flank both the northerly and southerly sides of the site. As previously mentioned, Dupre', 1990 and Clark, Brabb & Rosenberg, 2000 (Figure 3) have mapped a large landslide several acres in area on the steep slopes at southwesterly corner of the site extending offsite to the south. During the course of this investigation we confirmed the presence of this large block slide type failure as depicted on Sheet 1. In response to the reactivation of this slide in early to mid-1990's, three landslide stabilization walls were constructed to stabilize the slope and limit the potential impact to the adjacent downslope residences within the Las Palmas Ranch subdivision. On the northerly flank of the site, several smaller earthflow and surficial type of failures have been mapped (Sheet 1).

SUBSURFACE CONDITIONS

As part of the soil engineering feasibility investigation 13 exploratory test pits were excavated in proposed development area. Subsurface constituents were similar to the depths explored in each of the exploratory test pits. The earth materials encountered consisted of Pleistocene age fluvial terrace deposits and Plio(?)-Pleistocene age continental deposits. These materials consist of loose to very dense, silty SAND, well graded SAND and lesser amounts of clayey SAND. One notable exception was the discovery of a significant trash fill pit located in the south central portion of the site (TP-5, Figure A3 & TP-13, Figure A4). The materials consisted of substantial quantities of decomposing tree branches and limbs extending to a depth of 10.5 feet below the ground surface.

GROUNDWATER

Groundwater was not encountered in any of the exploratory test pits. No active springs were noted to occur on the site. Local groundwater levels can fluctuate over time depending on but not limited to factors such as seasonal rainfall, site elevation, groundwater withdrawal, and construction activities at neighboring sites. The influence of these time dependent factors could not be assessed at the time of our investigation.

CONCLUSIONS

Seismic Hazards The site is located in the seismically active Monterey Bay region of the Coast Ranges Geomorphic Province. The site is not located within any Earthquake Fault Zones in accordance with the Alquist-Priolo Earthquake Fault Zoning Act (formerly Alquist-Priolo Special Studies Zone Act) of 1972 (Hart and Bryant, 1997).

Surface Fault Rupture: The Blanco section of the Reliz fault is located approximately 300 feet east of the site (Rosenberg & Bryant, 2003). The Reliz fault has displayed late Quaternary displacement, but it is not located on the subject site, therefore potential for surface rupture to occur on the site is low.

Historical Earthquakes: During recent historic times moderate to large earthquakes have caused significant damage to man-made structures in the greater Monterey Bay area. These include the following:

1857 San Andreas Fault: A large quake occurred on the San Andreas fault, rupturing from Parkfield south to Wrightwood, on January 9, 1857. The quake had an estimated magnitude of 7.8. Very severe shocks were felt in Sacramento and a cabin was knocked down in the Cholame area (Rosenberg, 2001).

1881 Parkfield: On February 2, 1881 a 5.6 magnitude quake occurred in the Parkfield area knocking down several adobe structures and chimneys. Springs and cracks were also noted in the area of the quake (Rosenberg, 2001).

1901 Parkfield: A magnitude 5.8 struck the Parkfield area on March 2, 1901. Again many chimneys were damaged and cracks in the ground were noted. A small tsunami also occurred in the Monterey Bay. (Rosenberg, 2001)

1906 California: The 1906 (M_w~8.0) "San Francisco earthquake", which ruptured a portion of the active San Andreas fault from approximately San Juan Bautista to Cape Mendocino, caused severe damage in parts of the Monterey-San Francisco Bay area and throughout California. The earthquake occurred on April 18, 1906 and caused severe ground shaking, ground settlement, liquefaction, and structural damage to buildings in Monterey, Santa Cruz, and San Benito Counties (Lawson, 1908). The most significant earthquake effects in the area of the site and vicinity were the sinking of the Salinas River bed in the areas of Spreckels, King City and San Ardo. (Rosenberg, 2001). Ground water flow changes were also common. At Paraiso Springs the temperature and flow of water had been decreasing for "some time" before the quake (Lawson,

1908). After the quake the temperature and flow of the springs returned to its previous values (Lawson, 1908).

1922 Parkfield: The March 10, 1922 earthquake that struck the Parkfield area was a magnitude 6.1. It caused ground cracks six to twelve inches in width and a quarter-mile long in the Chalome Valley (Rosenberg, 2001). Chimneys were knocked down and some housed suffered structural damage. An oil pipeline was also damaged in the area.

1926 Monterey Bay Doublet: On October 22, 1926 two magnitude 6.1 earthquakes an hour apart occurred in southern Monterey Bay. Numerous buildings experienced damage and cracking on the Monterey Peninsula and in Salinas. It is postulated that the earthquakes occurred on either the San Gregorio fault or Monterey Bay fault zone (Rosenberg, 2001).

1934 Parkfield: A magnitude 6.1 earthquake again struck the Parkfield area on June 7, 1934. Again this quake caused fracturing of the ground surface and broke the oil pipeline in the area. Chimneys and houses were also damaged in the area (Rosenberg, 2001). This is the closest quake of magnitude 5.0 or greater to the site at approximately 37.4-km away.

1938 Stonewall Canyon: On September 27, 1938 a magnitude 5.0 quake occurred in the Stonewall Canyon area northeast of Soledad. Details of the damage caused by this quake are unknown.

1989 Loma Prieta: The October 17, 1989 (M_w 7.1) Loma Prieta earthquake, which is believed to have occurred on an oblique-slip blind thrust closely associated with the San Andreas fault, also caused significant damage in the San Francisco and Monterey Bay areas. It was the largest earthquake to strike this region of California since the California earthquake of 1906. The effects of this earthquake was felt over an area of 400,000 square miles and resulted in 74 deaths, 3,757 injuries, 12,000 homeless, and over $6 billion in property damage (Plafker & Galloway, 1989). In Monterey County 19 homes were destroyed, 341 homes damaged, two deaths and 14 people injured, and causing approximately $118 million in damages (Rosenberg, 2001). The Carmel Valley area suffered little damage as a result of this quake. The liquefaction experienced in the 1906 quake was absent during this event. The explanation given by Rosenberg, 2001 for the differences in liquefaction occurrence is differences in ground water table at the time of rupture. Groundwater was likely higher in 1906 as they had a wet winter, and the 1989 quake occurred after several years of drought.

As part of our historical earthquake research, we performed a database search of the California Geological Survey (http://redirect.conservation.ca.gov/cgs/rghm/quakes/historical/hiseq.asp) for earthquakes with magnitudes greater than 5.5 within an approximate 50-km radius of the site for the years from 1800 to 2014. The database research indicated a total of 23 events within the search parameters, see Table 1 below.

Table 2
California Historical Earthquakes (M>=5.5)
within 50 km of Latitude 36.6739, Longitude –121.6739

Date	Magnitude	Distance from Site	Location
10/11/1800	5.5	29.2 km	San Juan Bautista
06/10/1836	6.4	34.7 km	Between Monterey & Santa Clara
01/18/1840	6.5	29.2 km	San Juan Bautista
07/03/1841	5.9	27.5 km	San Juan Bautista
07/29/1841	5.8	28.2 km	San Juan Bautista
03/26/1866	5.8	42.3 km	Gilroy
03/30/1883	6.0	25.3 km	San Juan Bautista
04/15/1889	5.5	44.0 km	Hollister
04/24/1890	6.3	31.8 km	Pajaro Gap
11/13/1892	5.9	28.4 km	Hollister
06/20/1897	6.3	45.0 km	Gilroy
04/30/1899	6.0	26.4 km	Watsonville
07/06/1899	5.8	39.5 km	San Juan Bautista
05/18/1906	5.6	27.2 km	San Juan Bautista
03/11/1910	5.8	36.7 km	Watsonville
12/31/1910	5.7	42.9km	Monterey Bay
08/06/1916	5.6	38.2 km	Paicines Area
10/22/1926	6.1	48.0 km	Monterey Bay
10/22/1926	6.1	45.9 km	Monterey Bay
04/25/1954	5.6	31.9 km	Watsonville
04/09/1961	5.5	34.0 km	Hollister
04/09/1961	5.5	34.5 km	Hollister
01/26/1986	5.5	40.3 km	Paicines - Hollister

Our database search within the defined parameters revealed that the largest earthquake to occur was a M6.5 on January 18, 1840 located in the San Juan Bautista area about 29.2 km northeast of

the site. The closest earthquake with a M>=5.5 was a M6.0 event that occurred 25.3 km northeast on the site in the San Juan Bautista area on March 30, 1883.

Ground Shaking: The 1906 (M_w~8.0) "San Francisco earthquake", which ruptured a portion of the active San Andreas fault from approximately San Juan Bautista to Cape Mendocino, caused severe damage in parts of the Monterey-San Francisco Bay area. The earthquake occurred on April 18, 1906 and caused severe ground shaking and structural damage to buildings in Monterey, Santa Cruz and San Benito Counties (Lawson, 1908). The 1989 (M_w 7.1) Loma Prieta earthquake also caused significant damage in San Benito, Santa Cruz and Monterey Counties (McCann, 1990). Strong ground shaking associated with major earthquakes along the San Andreas and other nearby faults will undoubtedly occur at the site in the future. The peak ground acceleration with a 10 percent probability of being exceeded in a 50-year period in the vicinity of the site is 0.348g (USGS Ground Motion Parameters computer program, Version 5.1.0). The site modified calculated peak ground acceleration with a 2 percent probability of being exceeded in a 50-year period is 0.522g (USGS Ground Motion Parameters computer program, Version 5.1.0).

Seismic Design Parameters: For seismic design using the 2013 CBC, we recommend the following design values be used. The parameters were calculated using the U.S. Geological Survey Ground Motion Parameters computer program (Version 5.1.0) and were based on the approximate center of the site located at 36.6205° N. latitude and –121.6739° W. longitude.

2013 CBC Seismic Design Parameters

Design Parameter	***Site Design Value***
Site Class	**D – Stiff Soil**
Spectral Acceleration Short Period	**(S_s) = 1.304g**
Spectral Acceleration 1 Second Period	**(S_1) = 0.590g**
Short Period Site Coefficient	**(F_a) = 1.00**
1 Second Period Site Coefficient	**(F_v) = 1.50**
MCE Spectral Response Acceleration Short Period	**(S_{MS}) = 1.304g**
MCE Spectral Response Acceleration 1-Second Period	**(S_{M1}) = 0.884g**
5% Damped Spectral Response Acceleration Short Period	**(S_{DS}) = 0.870g**
5% Damped Spectral Response Acceleration 1-Second Period	**(S_{D1}) = 0.590g**

Liquefaction, Lateral Spreading, and Dynamic Compaction: Liquefaction is the transformation of soil from a solid to a liquid state as a consequence of increased pore-water pressures in response to strong ground shaking during an earthquake. Liquefaction most often occurs in loose saturated silts, and saturated poorly graded fine-grained sands. Liquefaction potential maps prepared by Dupre' (1990) show that the site is in an area of very low potential for liquefaction. Based on our field investigation and research, it is our opinion that the potential for liquefaction at the site is very low.

Lateral spreading can occur when soils liquefy beneath a slope, or even beneath level ground if an open topographic face is nearby. Since the potential for liquefaction at the site is judged to be very low, the potential for lateral spreading is likewise estimated to be very low. Dynamic compaction occurs when loose, unsaturated soils densify in response to ground shaking during a seismic event. Because no such materials were encountered on the site, it is our opinion that the potential for dynamic compaction is very low.

Ridge-Top Shattering: Ridge-top shattering was well documented after the 1971 San Fernando earthquake and also occurred during the 1989 Loma Prieta earthquake in the Santa Cruz Mountains. The phenomenon occurs most commonly on the crests of sharp ridges, where seismic shaking energy is concentrated as in the chimney of a building. Spreading can effect both soil and the underlying bedrock and gives the appearance of plowed ground (Barrows, 1975; Kahle, 1975). Most of the site is situated on gentle to steep slopes with rounded topography, as opposed to sharp ridge crests. Topographic features associated with ridge top spreading are also not present at the site or its vicinity. Therefore, the potential for ridge-top shattering is considered to be low.

Landsliding and Slope Stability: The steep slopes on the northerly and southerly flanks of the site are prone to landsliding and slope failure. Block landslides, surficial failures, earth flows and colluvial deposits of varying ages are present on these slopes, which are considered the most significant geologic hazards on the site. In order to mitigate the potential hazards from

landsliding and slope instability, future building foundations should be located within the Geologically Suitable Building Envelope as depicted on Sheet 1 of this report. *A supplemental site specific numerical slope stability analysis must be performed if structures designed for human occupancy extend beyond the limits of the of the identified Geologically Suitable Building Envelope.*

Grading: As the soil materials that will be supporting future foundations at depth consist of Pleistocene age semi-consolidated sediments, deep remedial grading is not considered necessary to improve the soils for foundation support. As previously noted, man-made deposits of fill and trash fill over 10 feet in depth are located on the site. The areas of undocumented fill must be completed removed down to firm and dense native earth materials and be backfilled with engineered fill prior to building development and foundation construction.

Soil Expansion: Based on visual observations and laboratory testing the near surface site soils are classified as silty SAND and well graded SAND, and are considered to be non-plastic. No special measures are required to mitigate the effect of soil expansion on foundations, and interior or exterior concrete slabs-on-grade.

Erosion: The site soils and earth materials are highly erodible. Stringent erosion control measures should be implemented to provide surficial stability of area that will be disturbed by proposed grading.

RECOMMENDATIONS

In our opinion, the site is suitable from a geologic and soil-engineering standpoint for the proposed development provided that the preliminary recommendations contained herein are implemented in the design and construction. The following preliminary recommendations are presented as guidelines to be used by project planners and designers for the geologic and soil engineering aspects of the project design and construction. *These recommendations have been prepared assuming that Landset Engineers, Inc. will be commissioned to perform additional design level investigation(s),* review proposed grading & drainage and foundation plans before construction, and to observe, test and advise during earthwork and foundation construction. Soil and groundwater conditions can deviate from the conditions encountered at the test pit locations. If significant variations in the subsurface conditions are encountered during construction, it may be necessary for Landset Engineers, Inc. to review the recommendations presented herein, and recommend adjustments as necessary.

Geologic

The following recommendations are drawn from the data acquired and evaluated during this investigation for the proposed project.

1. Prior to construction, the project geologist should review the site grading and improvement plans and their potential impacts on identified geologic hazards.
2. In order to mitigate the potential hazards from landsliding and slope instability, future building foundations should be located within the Geologically Suitable Building Envelope (Sheet 1). Structures designed for human occupancy should be located within this envelope.
3. Structures designed for human occupancy shall be designed according to the current edition of the CBC. Structures should be designed for peak horizontal ground acceleration of 0.522g.
4. The project geologist should review the site grading during earthwork. The purpose of this review is to examine the site for overall stability and to provide additional recommendations if site conditions differ those identified during the course of this investigation.

Soil Engineering

Site Preparation and Grading

1. The soil engineer should be notified **at least ten (10) working days prior to any site clearing or grading** so that the work in the field can be coordinated with the grading contractor, and arrangements for testing and observation services can be made. The recommendations contained in this report are based on the assumption that Landset Engineers, Inc. will perform the required testing and observation services during grading and construction. It is the owner's responsibility to make the necessary arrangements for these required services.

2. Prior to grading, construction areas should be cleared of obstructions, buried structures & utilities, tree roots, undocumented fill and other deleterious materials. Site clearing should be observed by a field representative of Landset Engineers, Inc. Voids created by removal of material as described above should be called to the attention of the soil engineer. No fill should be placed unless a representative of this firm has observed the underlying soil.

3. Following site clearing, the upper 1.5 to 3-feet of native soil should be overexcavated from the building areas. The actual depth of subexcavation should be determined by additional design level soil engineering investigation(s). Building areas are defined as the soils within and extending a minimum of 5 feet beyond the foundation perimeters and structural fill areas.

4. The soils exposed by overexcavation should be scarified 12 inches; moisture conditioned to above optimum moisture content, and compacted to at least 90% of maximum dry density. Where referenced in this report, percent relative compaction and optimum moisture content shall be based on ASTM test D1557. Areas to receive structural fill outside the building pad should be scarified and recompacted in a similar manner.

5. In order to limit the potential for differential settlement of conventional footings, foundations should not be supported on both fill and cut. Therefore, we recommend that the cut side of the building area should be overexcavated (undercut). The proposed grading within the building area should be designed so that no more than 5 feet of differential fill thickness exists below foundations. The portion of the building foundations bearing on cut should be undercut at least 3 feet below the proposed building pad so that the entire foundation is bearing on a uniform layer of compacted fill. Deeper overexcavation may be necessary in order to satisfy the differential fill thickness recommendations.

6. If structural fill is to be placed on slopes steeper than 6:1 (horizontal to vertical), keyways should be established at the toe of the proposed fill slopes. The keyways should have minimum widths of 12-feet and should be sloped approximately 2% back into the hillsides. The keyways and subsequent upslope benches should penetrate into sufficiently stable material at determined by the soil engineer at the time of grading.

7. If structural fill is to be placed on slopes steeper than 10:1, the slopes should be benched. The benches should have a minimum width of 12-feet and should be sloped approximately 2% back into the hillsides. The soil engineer will determine the depth, scarification, and recompaction of the bench bottoms at the time of grading.

8. If fill over cut slopes are to be constructed, keyways should be established at the cut/fill daylight lines. The keyways should have minimum widths of 12-feet and should be sloped approximately 2% back into the hillsides. The keyways and subsequent upslope benches should penetrate into sufficiently stable material as determined by the soil engineer at the time of grading.

9. The soil engineer should also observe keyways and benches to assess the need for subsurface drains (subdrains). Subdrains in other areas may also be recommended depending on the grading plan and site conditions observed at the time of grading.

10. Fill slopes should be constructed at a maximum finished slope inclination of 2:1 (horizontal to vertical). Fill slopes should be overfilled and trimmed back to competent material. Further compaction of exposed fill slope faces using sheepsfoot rollers or tracked equipment may be recommended by the soil engineer. Cut slopes should be constructed at an inclination of 2:1.

11. Fill, material should be placed in thin lifts, moisture conditioned to a level above optimum moisture content, and compacted to a minimum of 90 percent of maximum dry density. Prior to compaction, the soil should be cleaned of any rock, debris, and irreducible material larger than 3-inches in diameter.

12. Fill material should consist of non-expansive Select Structural Fill. Select Structural Fill is defined herein as a native or import fill material which, when properly compacted, will support foundations, pavements, and other fills without detrimental settlement or expansion. Select Structural Fill is specified as follows:

Select Structural Fill

- Clean native soil may be utilized, but import fill shall have a Plasticity Index of less than 12
- Be free of debris, vegetation, and other deleterious material
- Have a maximum particle size of 3-inches in diameter
- Contain no more than 15% by weight of rocks larger than 21/2-inches in diameter
- Have sufficient binder to allow foundation and unshored excavation stand without caving
- Prior to delivery to the site, a representative sample of proposed import should be provided to Landset Engineers, Inc. for laboratory evaluation

13. In areas to be paved, the upper 12-inches of subgrade soils and all aggregate base should be compacted to a minimum of 95 percent of maximum dry density. Aggregate base and subgrade should be firm and unyielding when proof rolled by heavy rubber-tired equipment prior to paving.

Foundations

14. Structures may be supported by conventional continuous and spread (pad) footings or drilled pier & grade beam foundations.

Conventional Footings

15. Conventional footings may be supported ***entirely on recompacted engineered fill or entirely on firm native soil, but not a combination of both***. Footings should have minimum depths of 12-inches below lowest adjacent grade for single story structures, and 18-inches below lowest adjacent grade for two story structures, and 24-inches below lowest adjacent grade for three story structures. For the above conditions, the footings for a proposed structure may be designed for an allowable bearing pressure range of 1,000 to 3,000 psf for dead plus live loads. Footings should be reinforced as directed by the architect/structural engineer.

16. Footing excavations should be observed by a representative of this firm prior to placement of formwork or reinforcement. Concrete should be placed only in foundation excavations that have been kept moist, and contain no loose or soft soil debris.

17. Footings located adjacent to other footings or utility trenches should have their bearing surfaces founded below an imaginary 1:1 (horizontal to vertical) plane projected upward from the bottom edge of the adjacent footings or utility trenches.

Pier & Grade Beam Foundations

18. Drilled friction and/or end bearing pier and grade beam foundations should penetrate through any engineered fill and/or topsoil and bear entirely into the dense native earth materials as verified by a representative of this firm at the time of drilling.

19. Foundation piers should be 12 to 24-inches in diameter and should be spaced apart at least 3 pier diameters, center to center. These cast-in-place concrete piers should be reinforced as directed by the project architect/structural engineer.

20. For the above conditions, the piers for a proposed structure may be designed for an allowable skin-friction range of 200 to 350 psf. for pier lengths in native earth materials for dead plus live loading. This value may be increased by one-third when considering temporary additional short-term wind or seismic loading. The support from end bearing of the piers should be neglected. Due to possible disturbance during drilling, skin friction on the upper 2-feet of the piers should be discounted in the calculations. Piers should be structurally connected to grade beams designed to transfer imposed loads to the foundation piers.

21. For calculating resistance to lateral loading, a passive resistance equal to an equivalent fluid weight range of 200 to 350 pcf. can be used (ultimate value). For pier foundations, this lateral resistance can be used over two times the cross sectional area of the pier. Only competent native earth material and engineered structural fill may be utilized in calculating lateral passive resistance. Additionally, the upper 2-feet of the pier should be ignored in providing lateral passive resistance.

22. Perimeter foundation piers and piers adjacent to structural concrete slabs-on-grade should be laterally restrained by concrete grade beams penetrating a minimum of 12-inches below lowest adjacent grade. Grade beams between interior piers are not considered necessary. Grade beams should be reinforced as directed by the project architect/structural engineer.

Slabs-on-Grade and Exterior Flatwork

23. For buildings utilizing conventional footings, interior slabs-on-grade should have a thickness of 4 to 6-inches. It should be noted that the project structural engineer might require thicker slab sections to provide the necessary support for the anticipated structural loads. Conventional concrete slabs-on-grade should be reinforced with steel as specified by the structural engineer.

24. To minimize floor dampness, such as where moisture sensitive floorings will be present, a section of capillary break material at least 4-inches thick covered with a membrane vapor barrier should be placed between the floor slab and the compacted soil subgrade. The capillary break should consist of a clean, free draining material such as ½ to ¾-inch drain rock with not more than 10 percent of the material passing a No. 4 sieve. The drain rock should be free of sharp edges that might damage the membrane vapor barrier. The membrane vapor barrier should be a minimum 10 mil in thickness, and care should be taken to properly lap and seal the vapor barrier, particularly around utilities. The sand cushion should be lightly moistened immediately prior to concrete placement.

25. Exterior concrete flatwork such as driveways, patios and sidewalks should be designed to act independently of building foundations. Exterior flatwork should be constructed on compacted soil subgrade moisture conditioned to over optimum moisture content. Reinforcement and joint spacing should be at the direction of the architect/structural engineer.

Retaining Walls

26. Retaining walls for the site may be designed using the following general design parameters, which assume fully drained wall backfill conditions. The average bulk density of material placed on the backfill sides of walls considers a design range of 120 to 130 pounds per cubic foot (pcf).

27. The vertical plane extending down from the ground surface to the bottom of the heel of the vertical wall will be subject to lateral soil pressures (plus surcharge loads). An Active Soil Pressure of 35 to 50pcf (equivalent fluid weight) should be used in design of site walls that are free to move laterally and resultant settlement of backfill is tolerable. An At-Rest Soil Pressure of 50 to 70pcf should be used in design for walls, which are restricted from movement at the top (such as foundation walls). The above pressures are applicable to a horizontal retained surface behind the wall. Walls having a retained surface that slopes upward from the wall should be designed for an additional equivalent fluid pressure of 1 pcf for the active case and 1.5 pcf for the at rest case, for every two degrees of slope inclination.

28. The additional effects of earthquakes on the walls may be simulated by applying a horizontal line force of $10H^2$ pounds per foot length of wall. This force should be applied at a height of 0.6H above the wall heel. The additional effects of vertical live loads on the backfill side of walls may be simulated by applying 50 percent of the live loads as a horizontal surcharge force on the walls. The point of application of the live load surcharge may be estimated by assuming a 45-degree line of action down from the live load to the design plane or wall stem.

29. Retaining walls should be supported on foundations bearing uniform soil conditions as described in the preceding foundation section of this report. The range for ultimate coefficient of friction below the base of the wall = 0.25 to 0.35. Passive soil resistance against the portion of the wall base and key is estimated to range from 200 to 350psf/ft.

for level ground in front of the wall. Lateral support from the soil that may be excavated or used in landscaping near the wall footing should be neglected. Typically this would include the top 12-inches of soil around the wall.

30. The earth pressures are based on fully drained conditions. We recommend that a zone of drainage material at least 12-inches wide should be placed on the backfill side of the walls. Drainage materials should consist of Class 2 permeable material complying with Section 68 of the Caltrans Standard Specifications, latest edition, or ¾-inch permeable drain rock wrapped in Mirafi 140N or equivalent. Manufactured drains such as Miradrain or Enkadrain are acceptable alternatives to the use of permeable or gravel material, provided that they are installed in accordance with the recommendations of the manufacturer. The drains should extend from the base of the walls to within 12-inches of the top of the wall backfill. The upper 12-inches of wall backfill should consist of compacted structural fill. A perforated pipe should be placed (holes down) about 4-inches above the bottom of the wall or below lowest adjacent grades in front of the wall. The perforations should be no larger than ¼-inch diameter, and the perforated pipe should be connected via a solid collector pipe to an approved point appropriate discharge facility.

31. Wall backfill should be moisture conditioned and compacted to a minimum of 90% of maximum dry density. If heavy compaction equipment will be used for compaction of the wall backfill, the wall design should include a compaction surcharge in addition to the soil pressures given above. Landset Engineers, Inc. should be consulted for proper compaction surcharge pressures. To avoid surcharging the walls, backfill within 3-feet of the wall should be compacted by hand operated equipment.

Utility Trenches

32. On-site soils should be properly shored and braced during construction to prevent sloughing and caving of trench sidewalls. The contractor should comply with the Cal/OSHA and local safety requirements and codes dealing with excavations and trenches.

33. A select non-corrosive, granular, material should be used as bedding and shading immediately around underground utility pipes and conduits. Native soils may be used for trench backfill above the select material.

34. Trench backfill in landscaped or unimproved areas should be compacted to a minimum of 85 percent of maximum dry density. Trench backfill beneath asphalt and concrete pavements should be compacted to a minimum of 95 percent of maximum dry density. Trench backfill in other areas should be compacted to a minimum of 90 percent of maximum dry density.

35. The bottoms of utility trenches that are parallel to foundations should not extend below an imaginary plane sloping downward at a 1:1 (horizontal to vertical) angle from the bottom outside edges of foundations.

Site Drainage

36. The site soils are highly erodible and a drainage & erosion control plan is essential to the project. Fluctuations of moisture contents are a major consideration, both before and after construction. Site runoff will be increased due to the new paved and roofed surfaced areas. A comprehensive drainage & erosion control plan designed by a Registered Civil Engineers essential to the long-term sustainability of the project.

37. Surface drainage should provide for positive drainage so that runoff is not permitted to pond adjacent to foundations, concrete slabs-on-grade, and pavements. Pervious ground surfaces should be finish graded to direct surface runoff away from site improvements at

a minimum 5 percent grade for a minimum distance of 10-feet. If this is not practicable due to the terrain or other site features, swales with improved surfaces should be provided to divert drainage away from improvements. Surface runoff collected in this swale should be controlled and flow in a non-erosive manner to an approved point of discharge.

38. Roof gutters should be utilized around the building eaves. Roof gutters should be connected to downspouts, which in turn should be connected to pipes leading to the site storm drain system. Runoff from downspouts, planter drains and other improvements should discharge in a non-erosive manner away from site improvements in accordance with the requirements of the governing agencies.

39. The migration of water or spread of root systems below foundations, slabs, or pavements may cause differential movement and subsequent damage. Landscaping runoff collection facilities should be incorporated in the project design.

40. Cut-off drainage swales should be constructed at the top of all cut and fill slopes. These drainage swales should be of adequate size to collect surface runoff and flow to an approved point of discharge in a non-erosive manner. Proper drainage and re-vegetation of graded slopes is essential to ensure stability.

QUALITY CONTROL

The conclusions and recommendations contained in this geologic hazards report and soil engineering feasibility investigation are preliminary in nature. We recommend that Landset Engineers, Inc. be retained to review preliminary plans once they are available. Additionally, we should provide final engineered grading, foundation, and retaining wall design criteria based on a site specific design level investigation(s) once the proposed site improvements, construction type, locations and anticipated loads are known. These services are beyond the scope of this investigation.

The following items should be performed, reviewed, tested, or observed by this firm:

- ***Design level soil engineering investigation(s)***
- ***Final grading & drainage and foundation plans***
- ***Site stripping and clearing***
- ***Overexcavation***
- ***Scarification and recompaction***
- ***Fill placement and compaction***
- ***Foundation excavations***
- ***Surface & subsurface drainage improvements.***
- ***Underground utility backfill and retaining wall construction.***
- ***Compaction of subgrade and Class 2 A.B. in areas to be paved.***

If Landset Engineers, Inc. is not retained to provide design level engineering geologic services, design level soil engineering services, or construction observation and compaction testing, we shall not be responsible for the interpretation of the information by others or any consequences arising therefrom.

LIMITATIONS AND UNIFORMITY OF CONDITIONS

The preliminary recommendations contained in this report are based, in part, on certain plans, information, and data that has been provided to us. Any changes in those plans, information, and data will render our recommendations invalid unless we are commissioned to review the changes and to make any necessary modifications and/or additions to our recommendations. The criteria in this report are considered preliminary until such time as they are modified or verified by the soil engineer in the field during construction. No representation, warranty, or guarantee is either expressed or implied. This report is intended for the exclusive use by the client and the client's architect/engineer. Application beyond the stated intent is strictly at the user's risk.

The recommendations of this report are based upon the assumption that the soil conditions do not deviate from those disclosed in the borings. If any variations or undesirable conditions are encountered during construction, Landset Engineers, Inc. should be notified so that supplemental recommendations can be given.

This report is issued with the understanding that it is the responsibility of the owner, or his representative, to ensure that the information and recommendations contained herein are called to the attention of the Architects and Engineers for the project and incorporated into the plans, and that the necessary steps are taken to ensure that the Contractor and Subcontractors carry out such recommendations. The conclusions and recommendations contained herein are professional opinions derived in accordance with current and local standards of professional practice.

The findings of this report are valid as of the present date. However, changes in the conditions of a property can occur with the passage of time, whether due to natural processes or to the works of man, on this or adjacent properties. In addition, changes in applicable or appropriate standards may occur, whether they result from legislation or the broadening of knowledge. Accordingly, the findings of this report may be invalidated, wholly or in part, by changes outside of our control. Therefore, this report should not be relied upon after a period of three years, without being reviewed by Landset Engineers, Inc. from the date of issuance of this report.

This report does not address issues in the domain of the contractor such as, but not limited to, loss of volume due to stripping of the site, shrinkage of fill soils during compaction, excavatability, and construction methods. The scope of our services did not include any determination or evaluation of soil corrosion potential, environmental assessment of wetlands, radioisotopes, hydrocarbons, hazardous or toxic materials, or other chemical properties in the soil, surface water, groundwater or air, on or below or around the site.

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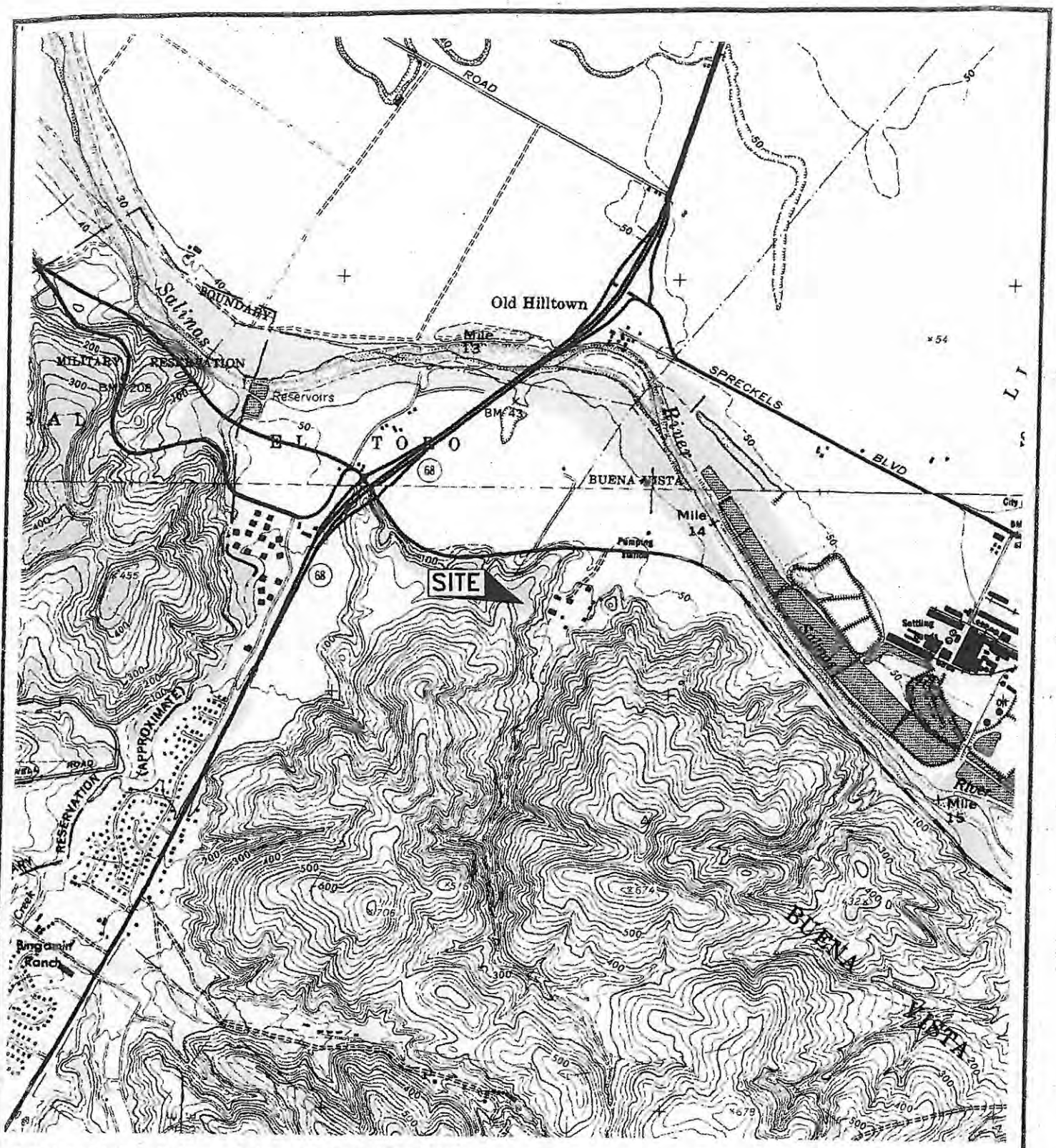
FIGURES

Figure 1, Vicinity Map
Figure 2, Regional Geologic Map
Figure 3, Geologic Vicinity Map
Figure 4, Explanation to Geologic Vicinity Map
Figure 5, Regional Fault and Seismicity Map



BASE MAPS: Salinas & Spreckels Point, California
U.S.G.S. 7.5' Topographic
Quadrangle Maps

Scale: 1"=2000'

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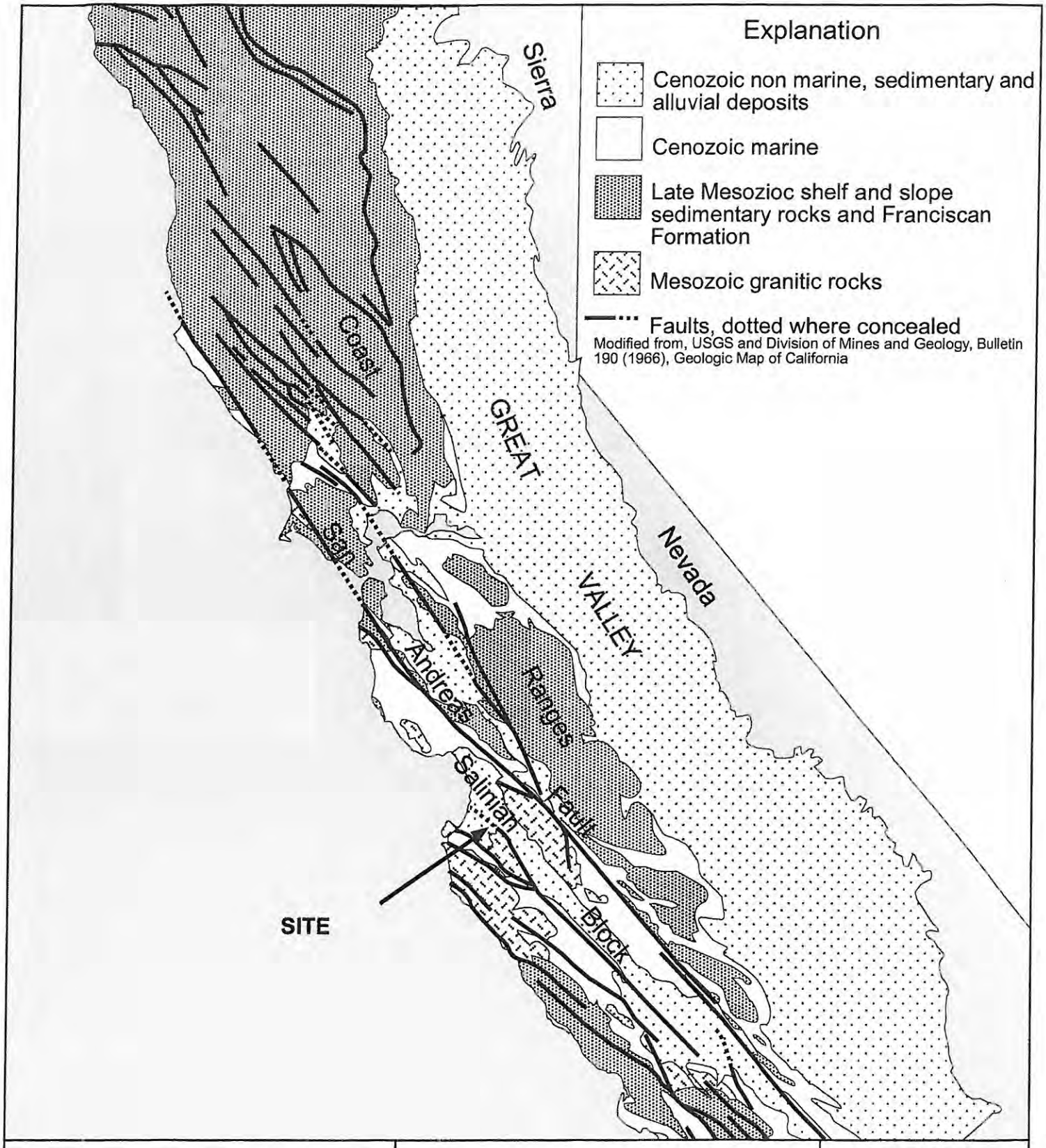
LANDSET ENGINEERS, INC. 520B CRAZY HORSE CANYON ROAD, SALINAS, CA 93907 (831) 443-6970 FAX(831) 443-3801	**Vicinity Map** Riverview at Las Palmas (APN 139-211-035) Woodridge Court Monterey County, California	FIGURE **1** PROJECT **1272-01**



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Regional Geologic Map
Riverview at Las Palmas
(APN 139-211-035)
Woodbridge Court
Monterey County, California

FIGURE 2

PROJECT 1272-01

After Clark, Brabb & Rosenberg, 2000

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Geologic Vicinity Map
Riverview at Las Palmas (APN 139-211-035)
Woodridge Court
Monterey County, California

FIGURE
3

PROJECT
1272-01

LIST OF MAP UNITS

[See accompanying pamphlet for more detailed Description of Map Units]

Qb **Basin deposits (Holocene)**—Unconsolidated, plastic clay and silty clay containing much organic material; locally contains interbedded thin layers of silt and silty sand

Qal **Alluvial deposits, undivided (Holocene)**—Unconsolidated, heterogeneous, moderately sorted silt and sand with discontinuous lenses of clay and silty clay

Qyf **Younger flood-plain deposits (Holocene)**—Unconsolidated, relatively fine-grained, heterogeneous deposits of sand and silt; commonly includes relatively thin, discontinuous layers of clay

Qcf **Abandoned channel fill deposits (Holocene)**—Unconsolidated, plastic, poorly sorted clay, silty clay, and silt. Deposited within channels on younger and older flood-plain deposits. Thickness generally less than 3 m

Qc **Colluvium (Holocene)**—Unconsolidated, heterogeneous deposits of moderately to poorly sorted silt, sand, and gravel deposited by slope wash and mass movement

Qaf **Artificial fill (Holocene)**—Heterogeneous mixture of artificially deposited material ranging from well-compacted sand and silt to poorly compacted sediment high in organic content; only locally delineated

Qls **Landslide deposits (Quaternary)**—Heterogeneous mixture of deposits ranging from large block slides of indurated bedrock to debris flows in semiconsolidated sand and clay

Qof **Older flood-plain deposits (Holocene)**—Unconsolidated, relatively fine-grained, heterogeneous deposits of sand and silt, commonly includes relatively thin layers of clay

Qch **Alluvial fan deposits of Chualar (Pleistocene)**—Weakly consolidated, moderately to poorly sorted sand, silt, and gravel deposited as a series of alluvial fans flanking the Salinas Valley, south of Spreckels. Unit age is late Pleistocene

Qt **Terrace deposits, undivided (Pleistocene)**—Weakly consolidated to semiconsolidated, moderately to poorly sorted silt, silty clay, sand, and gravel deposited in a fluvial environment

Qp **Alluvial fan deposits of Placentia (Pleistocene)**—Semiconsolidated, moderately to poorly sorted sand, silt, and gravel; gravel content increases toward head of the fan. Similar to the alluvial fan deposits of Chualar (Qch), except capped by well-developed soils. Unit age is middle(?) Pleistocene

Qoe **Older eolian deposits (Pleistocene)**—Moderately well-sorted sand as much as 60 m thick that contains no intervening fluvial deposits

Qgl **Alluvial fan deposits of Gloria (Pleistocene)**—Moderately consolidated, deeply weathered, moderately to poorly sorted sand, silt, and gravel, capped with moderately well drained, maximally developed soils with duripans. Unit age is middle to early(?) Pleistocene

Qtc **Continental deposits, undivided (Pleistocene-Pliocene(?))**—Nonmarine, semiconsolidated, poorly sorted, fine- to coarse-grained sand with pebble and cobble gravel interbeds

Tsm **Santa Margarita Sandstone (Miocene)**—Marine and brackish-marine, white, friable, fine- to coarse-grained, arkosic sandstone. Age of unit is late Miocene

Tuss **Unnamed sandstone, undifferentiated (Miocene)**—Marine; buff to light-gray, poorly to well-sorted arkosic sandstone, lithologically similar to unnamed sandstone (Tus). Rests with apparent conformity on the unnamed conglomerate (Tuc). Where Monterey Formation is absent, the unnamed sandstone is not differentiated from the younger Santa Margarita Sandstone, and both units are mapped as Tuss. Age of unit is middle to late Miocene

Tmd **Monterey Formation, diatomite (Miocene)**—Very pale orange to white, soft, punky, commonly silty; Mohnian Stage

Tm **Monterey Formation, porcelanite (Miocene)**—Light-brown to white, hard, brittle, platy; Mohnian Stage

Tus **Unnamed sandstone (Miocene)**—Marine, buff to light-gray, poorly to well-sorted arkosic sandstone, locally friable, locally conglomeratic. Age of unit is middle Miocene

Tuc **Unnamed conglomerate (Miocene)**—Nonmarine; buff to light-gray, poorly sorted sandy cobble conglomerate, well-indurated. Age of

Kgd **Granodiorite of Cachagua of Ross (1976a) (Late Cretaceous)**

Kqm **Garnetiferous quartz monzonite of Pine Canyon of Ross (1976a) (Late Cretaceous)**

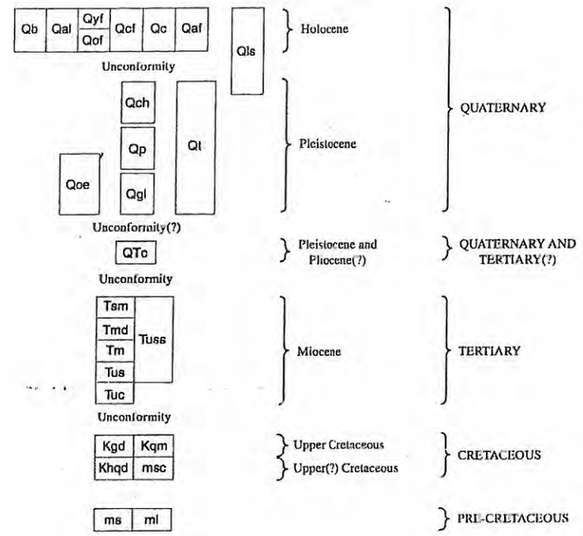
Khqd **Hornblende-biotite quartz diorite and diorite of Corral de Tierra (Late? Cretaceous)**

msc **Schist of the Sierra de Salinas of Ross (1976a) (Late? Cretaceous)**

ms **Quartzofeldspathic rocks (pre-Cretaceous)**

ml **Marble (pre-Cretaceous)**

CORRELATION OF MAP UNITS



EXPLANATION

Contact—Dashed where approximately located or gradational, dotted where concealed, queried where questionably located

Fault—Dashed where inferred, dotted where concealed, queried where doubtful. U, relatively upthrown side; D, relatively downthrown side

Fold—Dashed where approximately located, dotted where concealed. Showing direction of plunge

Anticline

Syncline

Strike and dip of beds

Horizontal

Inclined

Overturned

Vertical

Ash Bed

Foliation

Water well

Dry hole drilled for hydrocarbon exploration

Landslide– Arrows show general direction of movement. Query indicates that identification of feature as a landslide is in doubt

Spring

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Explanation to Geologic Vicinity Map

Riverview at Las Palmas (APN 139-211-035)
Woodridge Court
Monterey County, California

FIGURE
4
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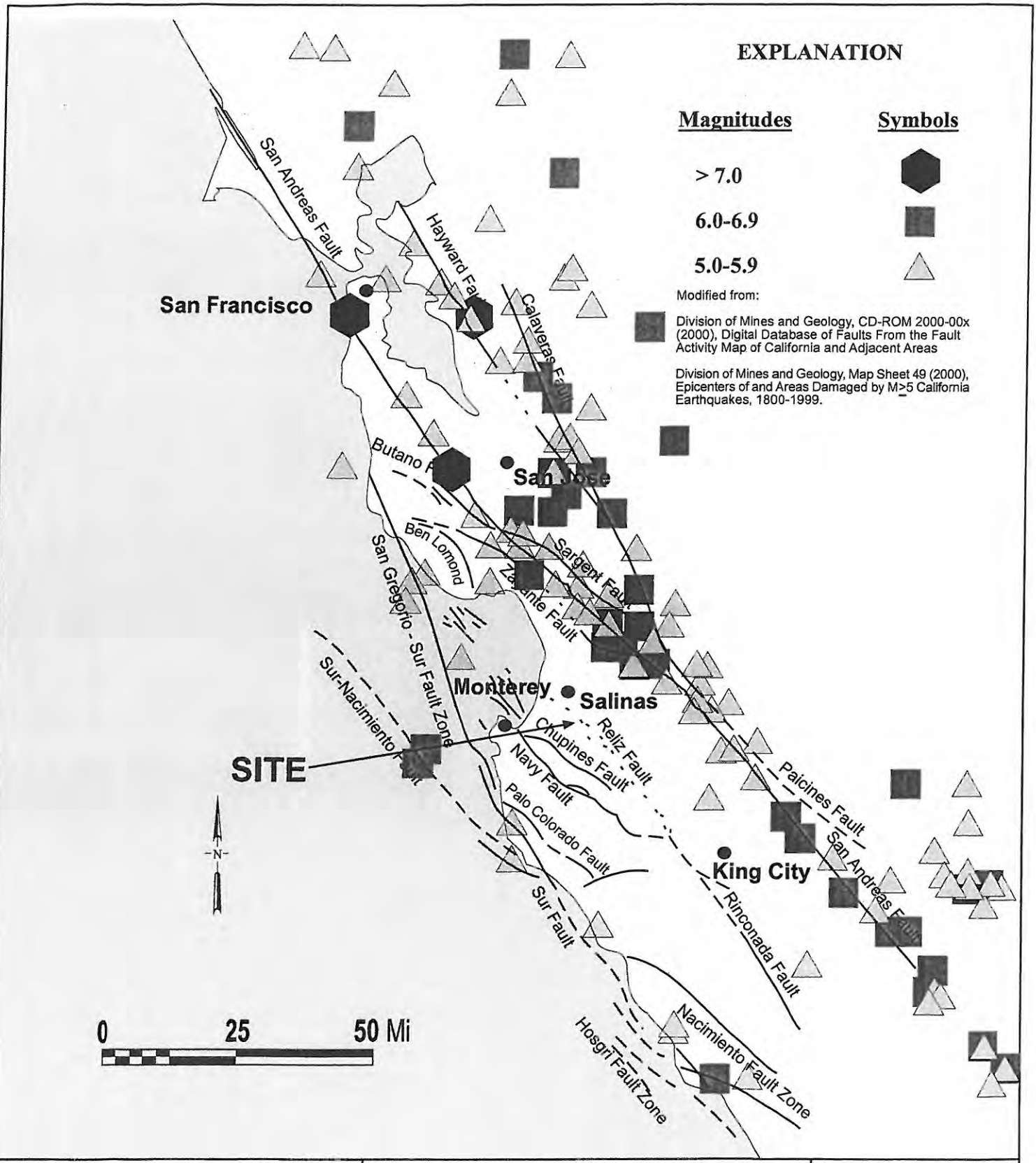

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Regional Fault and Seismicity Map
Riverview at Las Palmas
(APN 139-211-035)
Woodbridge Court
Monterey County, California

FIGURE
5

PROJECT
1272-01

APPENDIX A

Unified Soil Classification Systems
Soil Terminology
Logs of Exploratory Test Pits TP-1 through TP-13

UNIFIED SOIL CLASSIFICATION SYSTEM

MAJOR DIVISIONS			GRAPHIC SYMBOL	LETTER SYMBOL	TYPICAL DESCRIPTIONS
COARSE GRAINED SOILS More than 50% of material is larger than No. 200 sieve size.	GRAVEL AND GRAVELLY SOILS More than 50% of coarse fraction retained on No. 4 sieve.	CLEAN GRAVELS		GW	Well-graded gravels, gravel-sand mixtures, little or no fines.
				GP	Poorly-graded gravels, gravel-sand mixtures, little or no fines.
		GRAVELS WITH FINES		GM	Silty gravel, gravel-sand-silt mixtures.
				GC	Clayey gravels, gravel-sand-clay mixtures.
	SAND AND SANDY SOILS More than 50% of coarse fraction passing No. 4 sieve.	CLEAN SAND (Little or no fines)		SW	Well-graded sands, gravelly sands, little or no fines.
				SP	Poorly-graded sands, gravelly sands, little or no fines.
		SAND WITH FINES (Appreciable amount of fines)		SM	Silty sands, sand-silt mixtures.
				SC	Clayey sands, sand-clay mixtures.
FINE GRAINED SOILS More than 50% of material is smaller than No. 200 sieve size.	SILTS AND CLAYS	LIQUID LIMIT LESS THAN 50		ML	Inorganic silts and very fine sands, rock flour, silty or clayey fine sands, or clayey silts with slight plasticity.
				CL	Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays, lean clays.
				OL	Organic silts and organic silty clay of low plasticity.
		LIQUID LIMIT GREATER THAN 50		MH	Inorganic silty, micaceous or diatomaceous fine sand or silty soils.
				CH	Inorganic clays of high plasticity, fat clays.
				OH	Organic clays or medium to high plasticity, organic silts.
HIGHLY ORGANIC SOILS				PT	Peat, humus, swamp soils with high organic contents.
VARIOUS SOILS AND MAN MADE MATERIALS					Fill materials.
MAN MADE MATERIALS					Asphalt and concrete.

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Figure A1

SOIL TERMINOLOGY

SOIL TYPES (Ref. 1)

Boulders:	Particles of rock that will not pass a 12 inch screen.
Cobbles:	Particles of rock that will pass a 12 inch screen, but not a 3 inch sieve.
Gravel:	Particles of rock that will pass a 3 inch sieve, but not a No.4 sieve.
Sand:	Particles that will pass a No. 4 sieve, but not a No. 200 sieve.
Silt:	Soil that will pass a No. 200 sieve, that is non-plastic or very slightly plastic, and that exhibits little or no strength when dry.
Clay:	Soil that will pass a No. 200 sieve, that can be made to exhibit plasticity (putty-like properties) within a range of water contents, and that exhibits considerable strength when dry.

MOISTURE AND DENSITY

Moisture Condition:	An observational term; dry, slightly moist, moist, very moist, saturated.
Moisture Content:	The weight of water in a sample divided by the weight of dry soil in the soil sample, expressed as a percentage.
Dry Density:	The pounds of dry soil in a cubic foot of soil.

DESCRIPTORS OF CONSISTENCY (Ref. 3)

Liquid Limit:	The water content at which a No. 40 soil is on the boundary between exhibiting liquid and plastic characteristics. The consistency feels like soft butter.
Plastic Limit:	The water content at which a No. 40 soil is on the boundary between exhibiting plastic and semi-solid characteristics. The consistency feels like stiff putty.
Plasticity Index:	The difference between the liquid limit and the plastic limit, i.e. the range in water contents over which the soil is in a plastic state.

MEASURES OF CONSISTENCY OF COHESIVE SOILS (CLAYS) (Ref's. 2 & 3)

Very soft	N=0-1 *	C=0-250 psf	Squeezes between fingers
Soft	N=2-4	C=250-500 psf	Easily molded by finger pressure
Medium Stiff	N=5-8	C=500-1000 psf	Molded by strong finger pressure
Stiff	N=9-15	C=1000-2000 psf	Dented by strong finger pressure
Very Stiff	N=16-30	C=2000-4000 psf	Dented slightly by finger pressure
Hard	N>30	C>4000 psf	Dented slightly by a pencil point

* N = Blows per foot in the Standard Penetration Test. In cohesive soils, with the 3" diameter sampler, 140 pound weight, divide the blow count by 1.2 to get N (Ref. 4).

MEASURES OF RELATIVE DENSITY OF GRANULAR SOILS (GRAVELS, SANDS AND SILTS) (Ref's. 2 & 3)

Very Loose	N=0-4 **	RD=0-30	Easily push a 1/2" reinforcing rod by hand
Loose	N=5-10	RD=30-50	Push a 1/2" reinforcing rod by hand
Medium Dense	N=11-30	RD=50-70	Easily drive a 1/2" reinforcing rod
Dense	N=31-50	RD=70-90	Drive a 1/2" reinforcing rod 1 foot
Very Dense	N>50	RD=90-100	Drive a 1/2" reinforcing rod a few inches

** N = Blows per foot in the Standard Penetration Test. In granular soils, with the 3" diameter sampler, 140 pound weight, divide the blow count by 2 to get N (Ref. 4). RD = Relative Density

Ref. 1: ASTM Designation: D 2487-93, Standard Classification of Soils for Engineering Purposes (Unified Soils Classification System).

Ref. 2: Terzaghi, Karl, and Peck, Ralph B., Soil Mechanics in Engineering Practice, John Wiley & Sons, New York, 2nd Ed., 1967, pp. 30, 341, 347.

Ref. 3: Sowers, George F., Introductory Soil Mechanics and Foundations: Geotechnical Engineering, Macmillan Publishing Company, New York, 4th Ed., 1979, pp. 80,81 and 312.

Ref. 4: Lowe, John III, and Zaccheo, Phillip F., Subsurface Explorations and Sampling Chapter 1 in "Foundation Engineering Handbook," Hsai-Yang Fang, Editor, Van Nostrand Reinhold Company, New York, 2nd Ed., 1991, p. 39.

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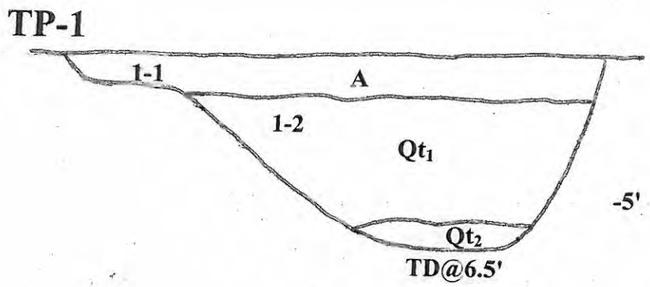
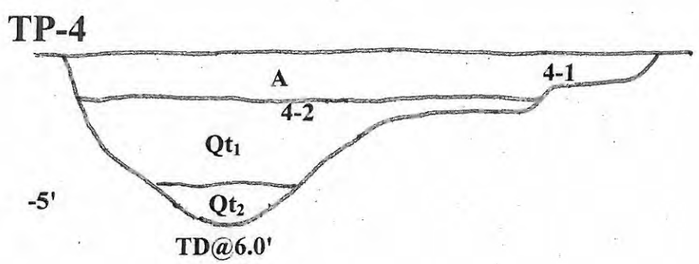
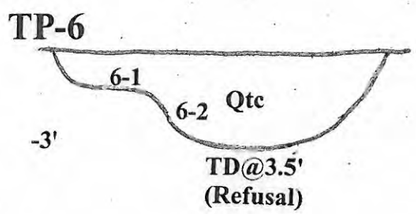
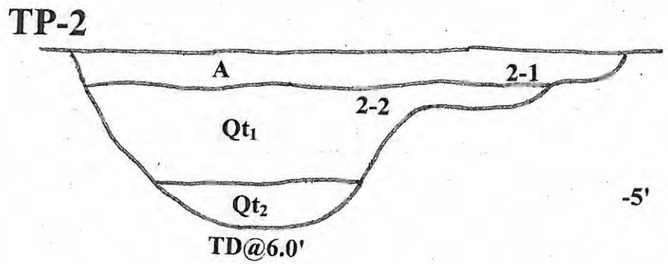
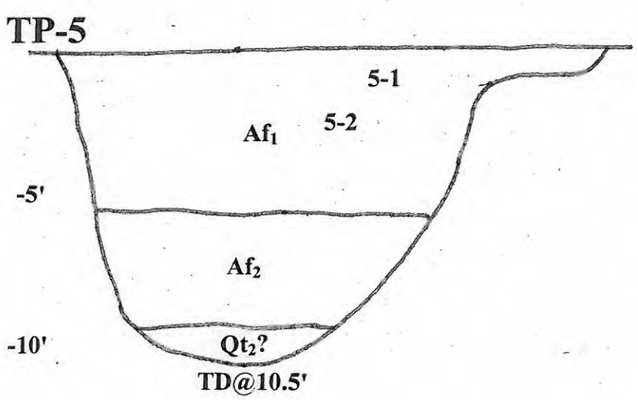
Figure A 2

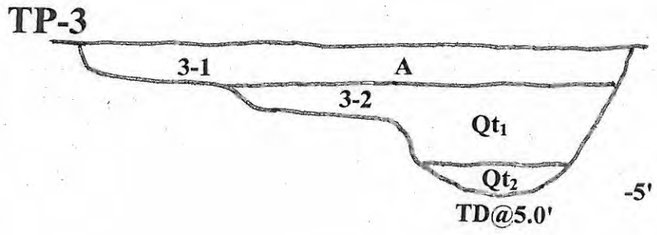












Explanation

Af_1: Artificial fill: Man made undocumented fill: Moderate gray clayey sand, loose to medium dense, moist, well graded, 35-40% fines.

Af_2: Artificial trash fill: Decomposing tree limbs & branches supported in dark gray clayey sand matrix.

A: Topsoil: Moderate brown silty SAND, loose, dry, 25-35% fines, rooted.

Qt_1: Terrace deposits (Pleistocene) – Weakly consolidated fluvial sediments composed of moderate brown silty SAND, medium dense to dense, slightly moist, well graded, 25-40% fines, trace gravel.

Qt_2: Terrace deposits (Pleistocene) – Semi-consolidated fluvial sediments composed of very pale orange silty SAND with gravel, dense to very dense, slightly moist, 15-25% fines.

Qtc: Continental deposits (Pleistocene-Pliocene (?)) – Semi-consolidated nonmarine sediments composed of very pale orange well graded SAND with gravel and cobbles, dense to very dense, slightly moist, 15-25% fines, locally cemented.

6-2: Approximate location of moisture/density test.

Scale: 1" = 5'

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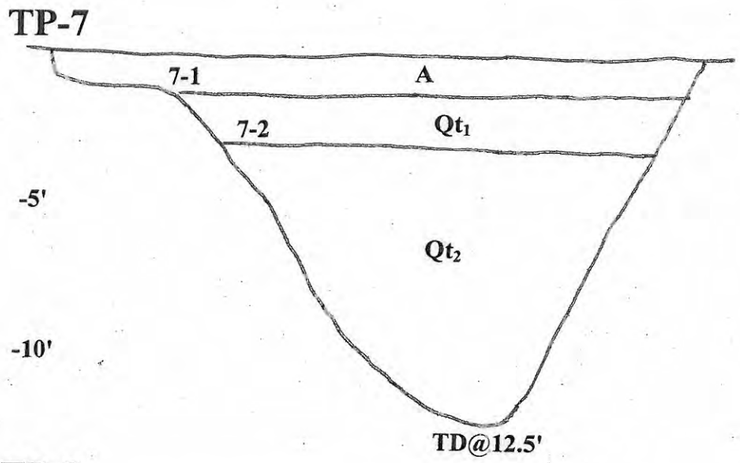
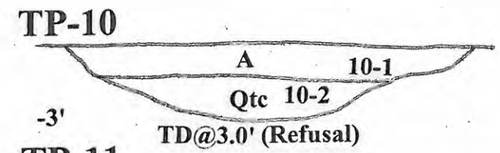
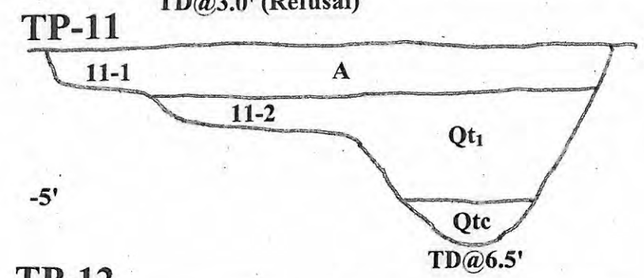
Logs of Exploratory Test Pits
TP-1 to TP-6
Riverview at Las Palmas (APN 139-211-035)
Woodridge Court
Monterey County, California

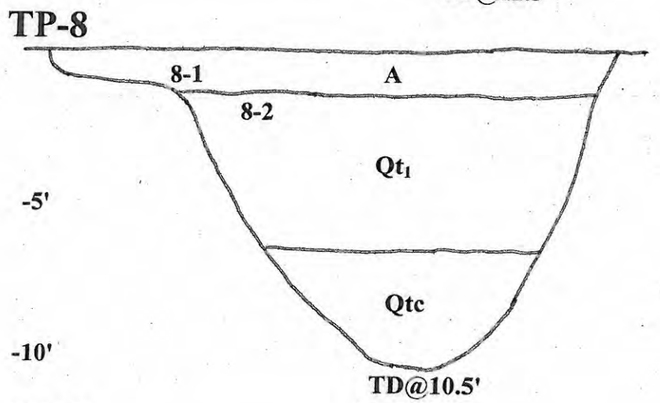
FIGURE
A3

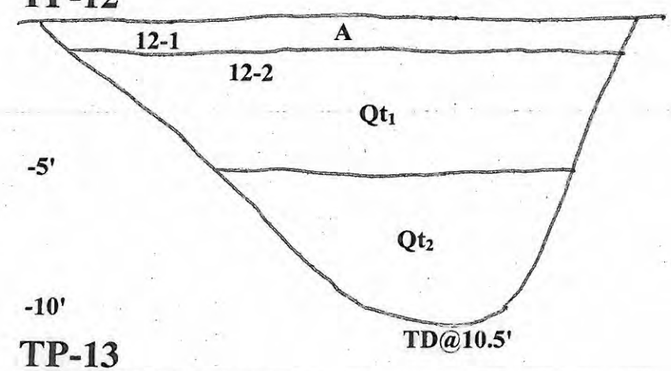
PROJECT
1272-01

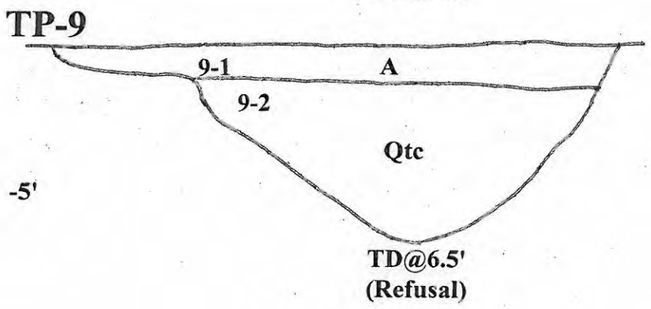


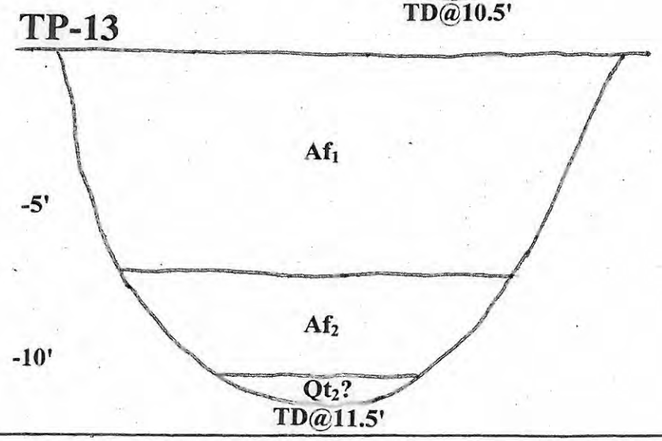












Explanation

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Qtc: Continental deposits (Pleistocene-Pliocene (?)) – Semi-consolidated nonmarine sediments composed of very pale orange well graded SAND with gravel and cobbles, dense to very dense, slightly moist, 15-25% fines, locally cemented.

12-2: Approximate location of moisture/density test.

Scale: 1" = 5'

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Logs of Exploratory Test Pits
TP-7 to TP-13
Riverview at Las Palmas (APN 139-211-035)
Woodridge Court
Monterey County, California

FIGURE
A4

PROJECT
1272-01

APPENDIX B

Laboratory Test Results

Table B-1
Summary of Laboratory Test Results

Sample No.	Depth (ft.)	Dry Density (pcf)	Water Content (%)
1-1	1.0-1.5	90.7	5.6
1-2	2.0-2.5	94.1	7.3
2-1	1.0-1.5	91.1	4.9
2-2	2.0-2.5	95.2	8.1
3-1	1.0-1.5	107.7	8.1
3-2	2.0-2.5	105.2	12.3
4-1	1.0-1.5	87.9	4.4
4-2	2.0-2.5	100.3	9.7
5-1	1.0-1.5	110.4	6.4
5-2	2.0-2.5	106.5	12.5
6-1	1.0-1.5	83.6	9.9
6-2	3.0-3.5	91.7	11.8
7-1	1.0-1.5	82.6	9.1
7-2	2.5-3.0	98.7	9.9
8-1	1.0-1.5	83.2	5.4
8-2	2.0-2.5	92.1	11.1
9-1	1.0-1.5	88.1	5.4
9-2	2.0-2.5	91.8	8.8
10-1	1.0-1.5	92.2	7.9
10-2	2.0-2.5	83.5	12.0
11-1	1.0-1.5	86.8	5.1
11-2	2.0-2.5	92.8	9.8
12-1	1.0-1.5	86.2	5.8
12-2	2.0-2.5	96.4	7.2

Summary of Compaction Curves (ASTM D 1557)

Sample No.	Description & (Source)	USCS	Density p.c.f.	Optimum Moisture % dry wt.
A	Brown silty SAND (TP-1 @ 0.0-2.0)	SM	129.0	8.0
D	Light brown silty SAND w/gravel (TP-9 @ 0.0-5.0)	SM	129.0	7.0

Summary of Atterberg Limits Test Results

Sample No.	Depth (ft.)	Liquid Limit	Plastic Limit	Plasticity Index
Bulk B, TP-5	0.0-5.0	17	14	3
Bulk C, TP-6	0.0-3.0	16	14	2

Summary of Sieve Analysis Test Results, Sample B (TP-5 – 0.0'-5.0')

Sieve No.	Cumulative % Retained	Cumulative % Passing
#4	0.2	99.8
#8	2.9	97.1
#16	10.3	89.7
#30	20.7	79.3
#50	35.3	64.7
#100	48.4	51.6
#200	59.9	40.1

Summary of Sieve Analysis Test Results, Sample B (TP-6 – 0.0'-3.0')

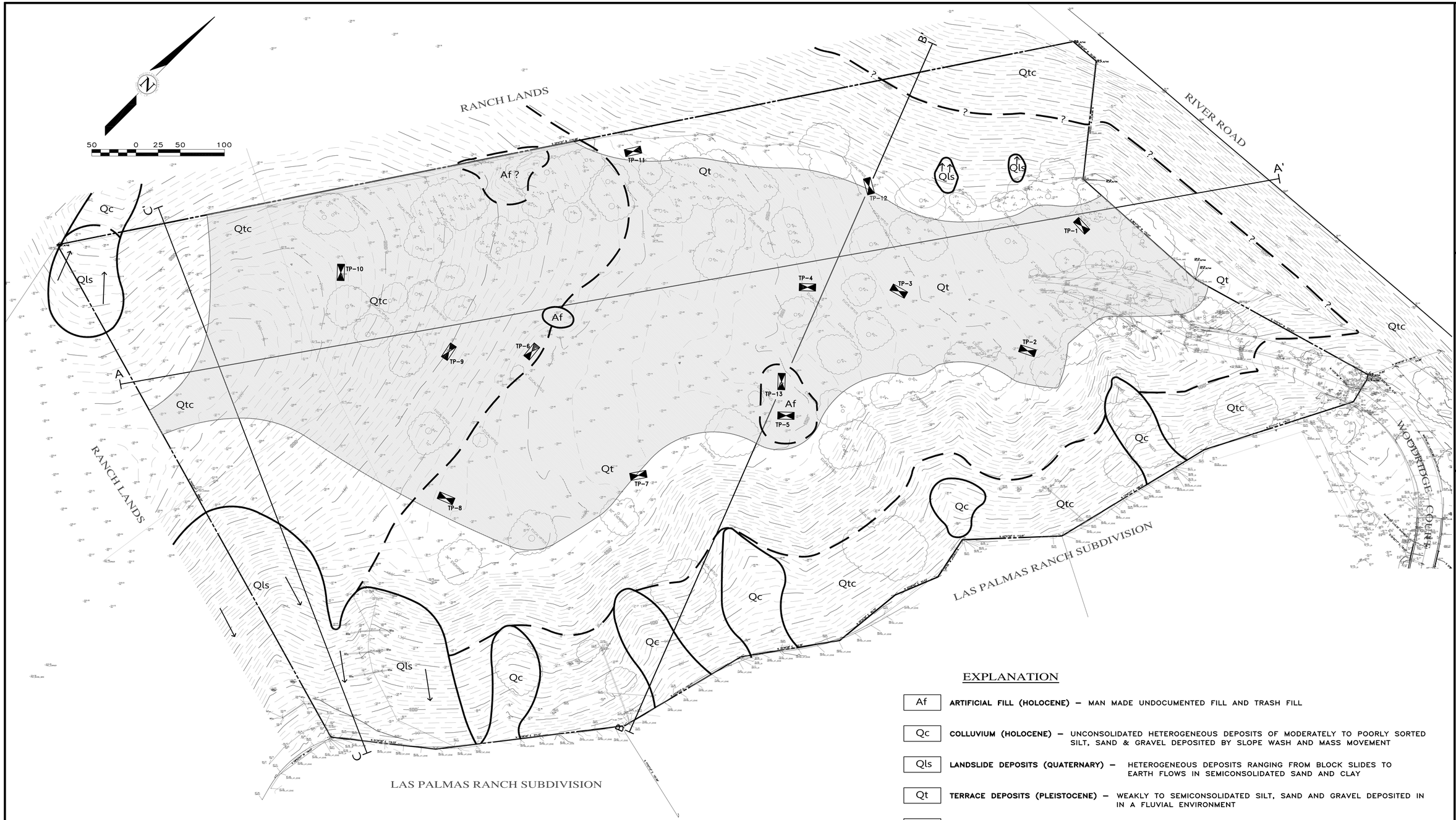
Sieve No.	Cumulative % Retained	Cumulative % Passing
#4	0.1	99.9
#8	2.6	97.4
#16	8.6	91.4
#30	18.7	81.3
#50	32.5	67.5
#100	43.1	56.9
#200	54.3	45.7

Summary of Sieve Analysis Test Results, Sample D (TP-9 – 0.0'-5.0')

Sieve No.	Cumulative % Retained	Cumulative % Passing
#4	3.4	96.6
#8	11.0	89.0
#16	23.2	76.8
#30	36.4	63.6
#50	51.6	48.4
#100	62.0	38.0
#200	73.9	26.1

Summary of Sieve Analysis Test Results, Sample E (TP-7 – 0.0'-5.0')

Sieve No.	Cumulative % Retained	Cumulative % Passing
#4	0.6	99.4
#8	4.7	95.3
#16	14.4	85.6
#30	26.3	73.7
#50	42.7	57.3
#100	57.5	42.5
#200	71.9	28.1



EXPLANATION

- **Af** — **ARTIFICIAL FILL (HOLOCENE) —** MAN MADE UNDOCUMENTED FILL AND TRASH FILL
- **Qc** — **COLLUVIUM (HOLOCENE) —** UNCONSOLIDATED HETEROGENEOUS DEPOSITS OF MODERATELY TO POORLY SORTED SILT, SAND & GRAVEL DEPOSITED BY SLOPE WASH AND MASS MOVEMENT
- **Qls** — **LANDSLIDE DEPOSITS (QUATERNARY) —** HETEROGENEOUS DEPOSITS RANGING FROM BLOCK SLIDES TO EARTH FLOWS IN SEMICONSOLIDATED SAND AND CLAY
- **Qt** — **TERRACE DEPOSITS (PLEISTOCENE) —** WEAKLY TO SEMICONSOLIDATED SILT, SAND AND GRAVEL DEPOSITED IN IN A FLUVIAL ENVIRONMENT
- **Qtc** — **CONTINENTAL DEPOSITS (PLEISTOCENE–PLIOCENE(?)) —** NONMARINE, CONSOLIDATED FINE TO COARSE GRAINED SAND WITH PEBBLE AND COBBLE GRAVEL INTERBEDS
- **CONTACT —** DASHED WHERE APPROXIMATELY LOCATED, QUERIED WHERE QUESTIONABLY LOCATED
- **LANDSLIDE —** ARROWS SHOW GENERAL DIRECTION OF MOVEMENT
- TP-13 — **TEST PIT —** APPROXIMATE LOCATION OF EXPLORATORY TEST PIT
- C — C' — **CROSS SECTION —** LOCATION OF GEOLOGIC CROSS SECTION (SEE SHEET 2)
- **GEOLOGICALLY SUITABLE BUILDING ENVELOPE**

PROFESSIONAL GEOLOGIST — BRIAN E. PAPURELLO — No. CEG 2226 — CERTIFIED ENGINEERING GEOLOGIST — Exp. 02-29-16 — STATE OF CALIFORNIA

APPROVED BY:

BRIAN E. PAPURELLO

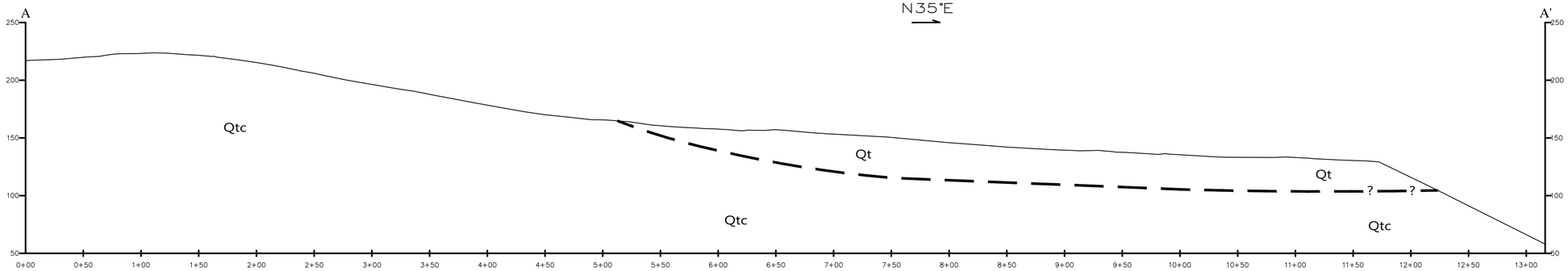
LANDSET ENGINEERS, INC.
ENGINEERING – LAND PLANNING
SURVEYING – ENVIRONMENTAL CONSULTING
520-B CRAZY HORSE CANYON ROAD, SALINAS, CA 93907

SITE GEOLOGIC MAP
OF
RIVERVIEW AT LAS PALMAS
APN: 139-211-035
MONTEREY COUNTY, CALIFORNIA
FOR
RIVER VIEW AT LAS PALMAS, LLC

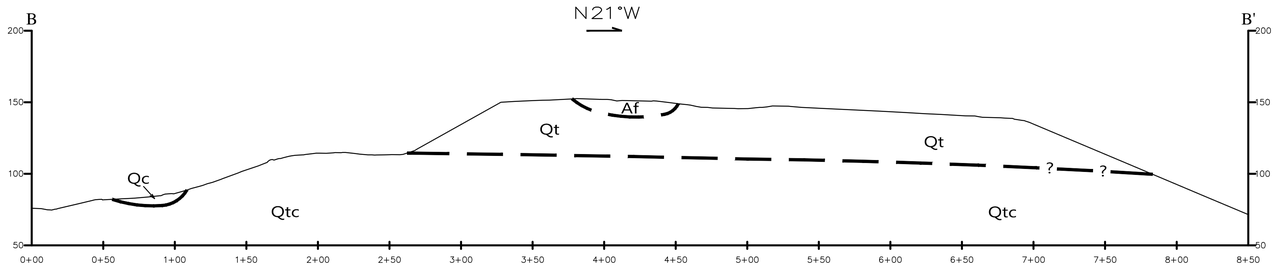
SCALE: 1"=50'
DATE: FEBRUARY 2014
JOB NO. 1272-01

SHEET 1

OF 2 SHEETS



SECTION A - A'
SCALE: 1"=50' H&V



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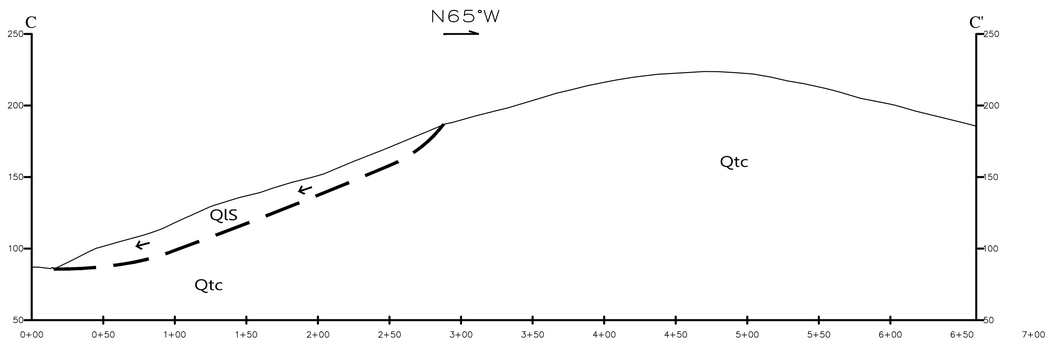

SECTION C - C'
SCALE: 1"=50' H&V

EXPLANATION

Af	**ARTIFICIAL FILL (HOLOCENE) –** MAN MADE UNDOCUMENTED FILL AND TRASH FILL
Qc	**COLLUVIUM (HOLOCENE) –** UNCONSOLIDATED HETEROGENEOUS DEPOSITS OF MODERATELY TO POORLY SORTED SILT, SAND & GRAVEL DEPOSITED BY SLOPE WASH AND MASS MOVEMENT
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CONTACT – DASHED WHERE APPROXIMATELY LOCATED, QUERIED WHERE QUESTIONABLY LOCATED

LANDSLIDE – ARROWS SHOW GENERAL DIRECTION OF MOVEMENT

PROFESSIONAL GEOLOGIST * BRIAN E. PAPURELLO * No. CEG 2226 * CERTIFIED ENGINEERING GEOLOGIST * Exp. 02-29-16 * STATE OF CALIFORNIA

APPROVED BY:

BRIAN E. PAPURELLO

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SURVEYING – ENVIRONMENTAL CONSULTING
520-B CRAZY HORSE CANYON ROAD, SALINAS, CA 93907

GEOLOGIC CROSS SECTIONS " A-A', B-B' & C-C' "
OF
RIVERVIEW AT LAS PALMAS
APN: 139-211-035
MONTEREY COUNTY, CALIFORNIA
FOR
RIVER VIEW AT LAS PALMAS, LLC

SCALE: 1"=50' H&V
DATE: FEBRUARY 2014
JOB NO. 1272-01
SHEET 2
OF 2 SHEETS

1272-RIVER VIEW LAS PALMAS\DWG\1272-SOILS/SHT2

APPENDIX G

CalAm Can and Will Serve Letter

CALIFORNIA
AMERICAN WATER

California American Water – Monterey
511 Forest Lodge Rd, Suite 100
Pacific Grove, CA 93950
amwater.com

November 3, 2015

Dale Ellis
Lombardo and Associates
144 West Gabilan
Salinas, CA 93901

Owner: River View at Las Palmas

Service Address: None assigned

Assessor's Parcel Number: 139-211-035-000

To Whom It May Concern:

This letter serves as notification that the above-referenced property (the "Service Address") is located within the California American Water ("CAW") sewer service area. CAW will provide sewer service to the Service Address pursuant to the rules, regulations, and tariffs of the California Public Utilities Commission (CPUC), and in accordance with all applicable federal, state and local laws, regulations, rules, ordinances and restrictions.

A party wishing to initiate sewer service (the "Applicant") must comply with all CAW Tariff Schedules that are on file with the CPUC, as they may be amended from time to time. Among other things, the Tariff Schedules require that the Applicant submit an application to CAW, obtain all required permits and pay all required fees as a condition of initiation of service. CAW's Tariff Schedules are available on its website, www.calamwater.com. Availability of sewer service to the Service Address is subject to change before the Applicant has applied for sewer service and has received all required permits and paid all applicable fees required to initiate such service.

Sincerely,
California American Water

By: _____
Eric Sabolsice
General Manager
Central Division

Exhibit F

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River View at Las Palmas Assisted Living Senior Facility

Final Subsequent Environmental Impact Report

SCH#2017031025

prepared by

County of Monterey
Resource Management Agency, Planning Division
1441 Schilling Place
Salinas, California 93901
Contact: Brandon Swanson, Interim RMA Chief of Planning

September 2019

River View at Las Palmas Assisted Living Senior Facility

Final Subsequent Environmental Impact Report

SCH#2017031025

prepared by

County of Monterey
Resource Management Agency, Planning Division
1441 Schilling Place
Salinas, California 93901
Contact: Brandon Swanson, Interim RMA Chief of Planning

September 2019

This report prepared on 50% recycled paper with 50% post-consumer content.

Table of Contents

1 Introduction 1-1
1.1 Purpose of the EIR Process 1-1
1.2 EIR Certification Process and Project Approval 1-1

2 Topical Responses 2-1
Topical Response A: Safety and Security 2-1
Topical Response B: Fire Safety 2-3
Topical Response C: Land Use Incompatibility, Property Value, and Quality of Life 2-6
Topical Response D: Transportation/Traffic 2-35
Topical Response E: Slope Stability and Stormwater Drainage 2-39
Topical Response F: Visual Impacts 2-50
Topical Response G: Wildlife Impacts 2-52
Topical Response H: Noise 2-52
Topical Response I: Private Land Rights 2-60

3 Responses to Comments on the Draft SEIR 3-1

4 Revisions to the Draft SEIR 4-1
4.1 Revisions to the Draft SEIR 4-1

5 References 5-1

Tables

Table 3-1 Policy Consistency Review (Los Palmas Ranch Specific Plan, Monterey County 2010 General Plan, Toro Area Plan) 2-8

Table 11-1 Noise Measurement Results 2-55

Table 11-2 Estimated Noise Levels by Construction Phase 2-56

Table 11-1 Noise Measurement Results 4-18

Table 11-2 Estimated Noise Levels by Construction Phase 4-20

Table 3-1 Policy Consistency Review (Los Palmas Ranch Specific Plan, Monterey County 2010 General Plan, Toro Area Plan) 4-27

Figures

Figure 11-2 Noise Measurement Locations 2-54

Figure 11-2 Noise Measurement Locations 4-17

Appendices

Appendix H April 2017 Botanical Survey

Appendix I-1 Conceptual Stormwater Control Plan

Appendix I-2 March 2019 California Water Service Can and Will Serve Letter
Appendix J Noise Modelling Results

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1 Introduction

1.1 Purpose of the EIR Process

This Final Subsequent Environmental Impact Report (Final SEIR) is an informational document prepared by the Monterey County Resource Management Agency (RMA) to evaluate the potential environmental impacts of the proposed River View at Las Palmas Assisted Living Senior Facility project (project). The primary objectives of the EIR process under the California Environmental Quality Act (CEQA) are to inform decision-makers and the public about a project's potential significant environmental effects, identify possible ways to minimize significant effects, and consider reasonable alternatives to the project.

As prescribed by the *State CEQA Guidelines* Sections 15088 and 15132, the lead agency, the County of Monterey, is required to evaluate comments on environmental issues received from persons who have reviewed the Draft Subsequent EIR (Draft SEIR) and to prepare written responses to those comments. This document, together with the Draft SEIR (incorporated by reference in accordance with State CEQA *Guidelines* Section 15150) will comprise the Final SEIR for this project. Pursuant to the requirements of CEQA, the County of Monterey must certify the Final SEIR as complete and adequate prior to approval of the project or a project alternative.

This Final SEIR contains individual responses to each written letter received during the public review period for the Draft SEIR. In accordance with *State CEQA Guidelines* Section 15088(b), the written responses describe the disposition of significant environmental issues raised. Monterey County RMA has provided a good faith effort to respond in detail to all significant environmental issues raised by the comments.

1.2 EIR Certification Process and Project Approval

In accordance with the requirements of CEQA and the procedures of Monterey County, the Final SEIR must be certified as complete and adequate prior to any action on the proposed project. Once the EIR is certified and all information considered, using its independent judgment, the County can take action to go forward with the proposed project, make changes, or select an alternative to the proposed project. While the information in the EIR does not control the County's ultimate decision, Monterey County must respond to each significant effect and mitigation measure identified in the EIR by making findings supporting its decision.

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2 Topical Responses

This section presents detailed responses to comments that were made by more than one commenter where more than one commenter was making the same general statement of concern. Response to specific comment letters may refer the commenter to one or more of the topical responses presented herein.

As a general introduction, it should be noted that the Final EIR's conclusions on the character and significance level of environmental impacts are supported by substantial evidence, which is presented in the Draft SEIR and further clarified in this Response to Comments document. The County acknowledges that some commenters disagree with some conclusions in the Draft SEIR. Consistent with the intent of CEQA and the *CEQA Guidelines* for its implementation, this Final EIR also includes the differing opinions presented by the commenters. As stated in the *CEQA Guidelines* (Section 15151), disagreement among commenters, including experts, does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts; this is done in this Response to Comments document.

Topical Response A: Safety and Security

Numerous comment letters on the Draft SEIR address safety and security concerns for residents of the Las Palmas Ranch Phase #1 Subdivision (Subdivision). The Subdivision residents, through a homeowners association (HOA), pay for private security service, including a staffed and gated entrance that monitors all vehicles entering the Subdivision. Comments regarding safety and security express the concern that the project would result in an overall increase of traffic flowing into the Subdivision, which would include staff and visitors to the proposed senior assisted living center; therefore, the ability to monitor each vehicle entering the Subdivision would be compromised.

The project site is at the end of Woodridge Court. The access route to the project site includes, in order: River Road, Las Palmas Road, River Run Road, and Woodridge Court. The Subdivision currently pays for private security service. The security staff posts a guard at the Las Palmas Road main entrance during the daytime. The gate is not staffed during evening or nighttime hours, but a periodic nighttime patrol occurs through the Subdivision. Private security is discussed in Section 11.9, *Public Services,* of the Draft SEIR.

The Draft SEIR provides traffic analysis in Section 9.0, *Transportation & Traffic.* The segment of Las Palmas Road between River Road and Winding Creek Road serves as the entrance to the Subdivision. Traffic counts from 2013 indicated approximately 1,837 daily trips on this segment. The project would add approximately 363 vehicles per day. Some of these trips would occur during hours in which the security gate is staffed, thus increasing the demand on security staff and potentially slowing down traffic through the gated area. Mitigation Measure TRA-1 requires that employee shift changes to the project site (once the senior assisted living community is operational) would occur outside of peak traffic hours. Mitigation Measure TRA-2 would require a shuttle service plan for residents and staff of the senior assisted living community. These two measures would reduce the impact on the Subdivision's security operations by ensuring project employee traffic

does not overlap with the Subdivision's residential traffic during peak hours, and by decreasing project trips to and from the project site by providing the shuttle service for project residents.

Additional security screening procedures, which may be in place when the project is occupied, are not analyzed under CEQA, nor in this EIR. However, reasonable security procedures to ensure the security of the Subdivision is not affected by the project include the implementation of advanced notices of visitors to security staff, the issuance of parking permits or identification for staff at the assisted living facility, and continued screening by security staff of all visitors who queue at the security gate. As noted under Topical Response D, *Transportation/Traffic,* below, as a condition of approval of the project, the County would require employees at the senior assisted living community to display windshield tags. This condition of approval would eliminate the need to check each employee's vehicle, reducing the length of queues at the gate and allowing security staff to better monitor activities.

Furthermore, the assisted living facility would have its own security staff on site to monitor activities at the facility. The Draft SEIR states in Section 11.9, *Public Services,* that the proposed project would participate proportionately in the cost of the Subdivision's security service. To clarify the proposed cost-sharing arrangement, page 11-9 of the Draft SEIR is amended as follows:

> Neighboring Las Palmas Ranch #1 currently has private security for the subdivision. The proposed project would participate proportionately in the cost of that security and will provide additional on-site security, which would lessen the need for on-site police protection. As described in the Project Description, a written agreement between the project applicants and the HOA would be necessary to clarify cost-sharing for road maintenance and private security service.

In addition to private security on the project site and the project's proportional payment for the Subdivision's security service, the Monterey County Sheriff's Office would provide police protection services to the project site.

Section 11.9, *Public Services,* is amended to include information about police protection as follows:

> **Police Protection**
>
> The Monterey County Sheriff's Office provides police protection services to unincorporated portions of the county, which includes the project site. Services include patrol, crime prevention, and crime investigation provided from three offices located in Monterey, Salinas, and King City (Monterey County RMA 2008). The Sheriff's Office has a total of 442 employees that consists of 320 sworn officers and deputies, and 122 non-sworn officers and professional staff (Galletti 2019). Based on the County's current population estimate of 110,000 residents (unincorporated; CA DOF 2019), the Sheriff's Office maintains a service ratio of approximately three sworn officers for every 1,000 residents (unincorporated).
>
> The project site is located in Beat 4B, which is served by officers and staff located in the Central Station (1414 Natividad Road, City of Salinas), which is approximately six miles northwest from the project site (Galletti 2018). The Central Station has one Beat 4 deputy officer for each of the three daily shifts, who patrols both the Beat 4A and Beat 4B areas. However, additional personnel assigned to the Central Station include one Station Commander, nine sergeants, and 45 deputies across the three daily shifts (Galletti 2019).
>
> The average response time for all call types for the Las Palmas area of the Beat 4B area is 17 minutes and 47 seconds, where average response time for Priority 1 (emergency) calls is 12

minutes and 55 seconds (Galletti 2019). The County General Plan Public Service Element states that maximum emergency response time for emergency calls for the Sheriff's Office in urban (developed) areas is five to eight minutes (Monterey County RMA 2010). Therefore, the Central Station does not currently meet the County' General Plan standard for Sheriff response.

The project would increase demand for emergency police services with the construction of the proposed senior and assisted living units and the addition of approximately 142 residents and a total of 92 employees across five shifts per day. The project site is located adjacent to the Las Palmas Ranch Phase #1 Subdivision community, which is already served and patrolled by the Sheriff's Office. The 66 proposed assisted living units would not exceed the capacity of the Sheriff Department to provide police services to the area, and the project would have no impact on the Sheriff's Office's ability to provide police protection services (Galletti 2018, 2019).

Furthermore, the Las Palmas Ranch Phase #1 Subdivision currently pays for private security service. There is a guard at the main entrance during the day time, but the post is not staffed in the evening or nighttime hours. A periodic patrol through the Subdivision is done at night. Given the project is for a senior assisted living community it is unlikely there will be a significant exposure to the need for increased police protection. Fire and ambulance service already exist for the project site vicinity and there is an agreement in place that the Subdivision is a "no-siren zone." The proposed project would participate proportionately in the cost of the Subdivision's security service, as discussed in Topical Response A of Section 3, *Responses to Comments on the Draft SEIR*.

Therefore, the proposed project would have a less than significant impact on police protection since no new or expanded facilities would be required as a result of the project, and with the project's payment of applicable taxes and/or fees and the proportional contribution to private security services with adjacent existing communities.

Topical Response B: Fire Safety

Multiple commenters state that the project site is vulnerable to wildfires, and that the project would worsen wildfire-related risks by adding structures and residents to the area.

As discussed in Section 11.5, *Hazardous Materials*, the project would implement all fire protection regulation requirements and design recommendations based on project review completed by the Monterey County Regional Fire District (MCRFD), which reflect the current requirements of the Uniform Fire Code to ensure fire-safe structures. Furthermore, as noted in Section 11.9, the MCRFD reviewed the proposed site and building plans for the project, and determined that new or expanded fire protection facilities would not be required as a result of implementing the project. The Fire District maintains mutual aid agreements with neighboring fire departments and CAL FIRE for additional support in the event of wildfires.

The Draft SEIR states in Section 11.5, *Hazardous Materials,* that the project site is not located in a high or very high fire hazard area. Upon review of County's General Plan and General Plan EIR (Monterey County RMA 2008), the Draft SEIR is amended as follows:

According to the Monterey County General Plan, the project site is ~~not~~ located in a moderate to high ~~or very high~~ fire hazard area. Fire protection to the project site would be provide by the Monterey County Regional Fire District, which has mutual aid agreements with neighboring fire departments and CAL FIRE for additional support in the event of wildfires.

Furthermore, "Wildfire" was added as a CEQA section effective January 1, 2019. Analysis under the following four criteria must be completed for projects located in or near State Responsibility Areas (SRA) or lands classified as very high fire hazard severity zones:

- A project's potential to substantially impair an adopted emergency response plan or emergency evacuation plan;
- Due to slope, prevailing winds, and other factors, a project's potential to exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
- Require the installation or maintenance of associated project 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; and/or
- A project's potential to 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.

Although the 2019 Guidelines update does not apply to the project, since the Draft SEIR was circulated prior to its adoption, the above criteria are considered in the following discussion to provide information pertaining to potential wildfire impacts in relation to the project, to address concerns raised in the comments.

The project site is not located in a SRA-classified very high fire hazard severity zone, and shares similar wildfire hazard risks as the Subdivision due to the proximity to the Toro Regional Park. As noted in the revised sections for *Hazardous Materials* (11.5) and *Public Services* (11.9), the MCRFD would provide fire protection services to the project site. The MCRFD currently serves the Subdivision, and discussion pertaining to emergency access to the project site is discussed in Section 9.0 *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project.

As stated in Section 3.0, *Environmental Setting*, of the Draft SEIR, the project site is a knoll that rises above River Road and the existing Subdivision, with a flat plateau where the proposed buildings would be constructed. Future building foundations would be located in geologically suitable portions of the project site in accordance with findings of the geologic hazards report and soil engineering feasibility investigation, which was included as Appendix F to the Draft SEIR. Section 11.4, *Geology and Soils*, states that erosion control measures and all recommendations included in the geotechnical report would be implemented as a condition of project approval to ensure the project would have low to no potential for landslides.

The concern for potential spread of wildfire is reasonable based on historic fire events in the region, proximity to the Toro Regional Park, and existing residential developments such as the Subdivision. The proposed site plan has been designed to comply with the County's fuel modification standards (Title 18, Chapter 18.56.090 *Fuel Modification Standards*) to minimize potential wildfire hazards on the project site and vicinity.

Section 11.9, *Public Services,* is amended to include information about fire protection as follows:

Fire Protection

The Monterey County Regional Fire District (MCRFD) provides fire protection and emergency services to portions of the county, which includes the project site. Services include response to

fires (structural, wildland, vehicle, and other types), medical emergencies, vehicle accidents, and hazardous materials accidents with staffing across seven fire stations (MCRFD 2019). The MCRFD covers a service area of approximately 400 square miles and maintains mutual aid agreements with neighboring fire departments and CAL FIRE (Monterey County RMA 2008). As of 2019, the MCRFD had 62 full-time employees and 15 volunteer firefighters (MCRFD 2019). The Toro Station (19900 Portola Drive, City of Salinas) is located nearest to the project site, approximately one mile southwest from the project site (MCRFD 2019). Personnel, fire protection resources, and emergency medical response and transport from the Toro Station would be first to respond to the project site when calls are placed to the MCRFD. The anticipated response time from the Toro Station to the project site is approximately five minutes for "Code 3" emergency calls, while "Code 2" non-emergency calls may be five minutes or slightly more based on traffic conditions at the time of the call (Priolo 2019). The maximum emergency response time service standard for fire protection is five to eight minutes for calls received in urban (developed) areas according to the County General Plan Public Services Element (Monterey County RMA 2010). Therefore, the Toro Station's anticipated response time to the project site would meet the County' General Plan standard for fire response. The Toro Station's current fire protection equipment stock and personnel rotation were determined by MCRFD to be sufficient in meeting fire protection and emergency medical response for the project's residents and employees (Priolo 2019). The project would not require construction of new or expanded fire service facilities or equipment.

The MCRFD also provides technical review of building construction plans to ensure proposed buildings, proposed site access, and on-site circulation meet the Fire District's adopted 2013 California Fire Code and applicable roadway design requirements prior to construction. The MCRFD reviewed the proposed site and building plans for the project as part of the County's review process and determined that a fire flow rate of 1,500 gallons per minute at a pressure of 20 pounds per square inch for a duration of up to three hours would be sufficient for the project since a fire sprinkler system for all proposed buildings would also be included as part of the project (Monterey County RMA 2015, 2016). The project would implement all design recommendations provided by the MCRFD to ensure project compliance with the Fire District's regulations and reduce fire hazards on the project site, as noted in Topical Response B of Section 2, *Topical Responses*.

Furthermore, developers in Monterey County are required to pay development impact fees that would go toward fire protection facilities, pursuant to Monterey County's Fire Mitigation Fee Ordinance (County Ordinance Title 10, Chapter 10.80) which constitute the project's contribution to the cumulative impact on the existing fire protection equipment and facilities Monterey County 2019; Priolo 2019). Therefore, the project would have a less than significant impact on fire protection since no new or expanded facilities are required as a result of the project, and with the project's adherence to applicable fire safety codes and design features as approved by MCRFD and payment of the County's Fire Mitigation Fee.

Topical Response C: Land Use Incompatibility, Property Value, and Quality of Life

Numerous comments state the opinion that the project is an inappropriate land use at the project site. Regarding the site's zoning and compliance with applicable planning documents, comments focus on two issues: the Las Palmas Ranch Specific Plan (LPRSP) sets a limit of 1,031 residential units in the Plan Area, which has already been nearly met, and would be exceeded if the project's structures are counted as residential units; and the site is designated for residential use, but the proposed project is a commercial use.

Regarding land use compatibility outside of the context of plans and regulations, commenters voice the following additional concerns: the project would consist of large buildings housing a large number of seniors, which is incompatible with the rural, family-oriented Subdivision; the project would decrease the property value of Subdivision residences; the project site is not a suitable location for a senior assisted living facility because the residents would not be nearby to services that they require, such as medical facilities; the project would result in nuisance odors due to food preparation for the senior assisted living center residents.

CEQA is primarily concerned with physical impacts to the environment. The Draft SEIR analyzes potential effects with respect to neighborhood compatibility insofar as it relates to physical impacts to the environment, such as impacts related to aesthetics, noise, and transportation. For the proposed project, these impacts were found to be less than significant or less than significant with mitigation. Compatibility with planning documents and the site's zoning is discussed below.

Land Use Incompatibility

The Las Palmas Specific Plan, Toro Area Plan, and Monterey County General Plan designate the project site as Medium Density Residential (MDR). The MDR designation is described as "…appropriate for a range of residential uses (1-5 units/acre) and housing types, recreational, public and quasi-public, and other uses that are incidental and subordinate to the residential use and character of the area…" (General Plan Policy LU-2.33a). The MDR district (Monterey County Code 21.12.050) allows for a range of land uses to be approved without a use permit or similar discretionary approval including rest homes and other uses of a similar nature and intensity.

The proposed project is consistent with the description of a "rest home" use as defined in Title 21, Monterey County Code:

> **21.06.940 – Rest home.** "Rest home" means a place used for the rooming or boarding of any aged or convalescent persons, whether ambulatory or non-ambulatory, for which a license is required by a county or federal agency.

The proposed project is also consistent with the description of a "public/quasi-public" use as defined in Title 21, Monterey County Code:

> **21.40.010 – Public/Quasi-Public.** Uses which serve the public at large.

Pursuant to Monterey County Code Section 21.12, Regulations for Medium Density Residential Zoning Districts, the proposed project is also consistent with the allowed uses listed:

> **21.12.050 – Uses allowed – Use Permit required in each case.**
>
> **21.12.050.C –** Rest homes (ZA);

> **21.12.050.D –** Public and quasi-public uses including churches, cemeteries, parks, playgrounds, schools, public safety facilities, public utility facilities, but not including uses of a non-residential nature such as jails, rehabilitation centers, detention facilities, or corporation yards; (Note: Other applicable or allowed public/quasi-public uses would include hospitals, hospices, and convalescent homes.)
>
> **21.12.050.R –** Other uses of a similar nature, density and intensity as those listed in this Section.

The proposed project would be a licensed Residential Care Facility for the Elderly (RCFE)(aka assisted living facility), and is therefore not a residential use under the County code or the Specific Plan, and the project would not provide dwelling units that would operate or function as independent units. Because the proposed project is not a residential use, the Las Palmas Specific Plan residential unit limitation of 1,031 does not apply to this project.

The MDR designation allows for related, public, and quasi-public uses in additional to residential uses. A senior assisted living facility is therefore an allowed use under the existing zoning, the general plan land use designation and the LPRSP designation. For clarity regarding the future use and development of the project site for the proposed project, the following amendment to the specific plan is proposed, as included on pages 4-18 and 14-2 of the Draft SEIR:

> Assisted living facilities are allowable uses in the MDR district in that they are similar to other uses such as rest homes and public quasi-public uses currently allowed in the district through the approval of a conditional use permit. Assisted living facilities are not considered residential units and are not subject to the current 1,031 residential limitation of the Specific Plan. An assisted living facility is considered a public/quasi-public use, not a residential use, because it does not operate or function in a manner like independent residential units. An assisted living facility may, therefore, be considered and approved through a conditional use permit on Parcel Q of the Las Palmas Ranch Specific Plan.

The project is similar in design and density to the Las Palmas Ranch residential neighborhood to the east, and as described above, is allowed in the MDR designation because it is considered compatible with residential uses.

Regarding consistency of the project with applicable plans and policies, the Draft SEIR included reference to Table 3-1, *Policy Consistency Review (Las Palmas Ranch Specific Plan, Monterey County 2010 General Plan, Toro Area Plan),* on page 3-13, but erroneously excluded the table from the Draft SEIR. Table 3-1 is included herein. The inclusion of this table in the Final SEIR does not represent substantial new information because the table merely summarizes analysis contained elsewhere in the Draft SEIR. The table, beginning on the following page, is hereby added to Section 3.4, *Consistency with Applicable Plans,* of the Draft SEIR, beginning on page 3-13:

Table 3-1 Policy Consistency Review (Las Palmas Ranch Specific Plan, Monterey County 2010 General Plan, Toro Area Plan)

	Consistency	Discussion
Las Palmas Ranch Specific Plan Policy		
Housing and Residential Land Use		
Policy 7. In order to preserve the semi-rural character of the area and to mitigate adverse impacts on significant viewshed areas, higher density housing should be clustered behind natural land forms, generally at lower elevations and not on steeper slopes or ridge lines.	Consistent with application of mitigation measures	Although the proposed project is not a residential project, it is located within an area designated "sensitive viewshed." Section 5.0, *Aesthetics,* of the Draft SEIR included visual simulations from SR 68 and from Reservation Road. The simulations show that although the project would be visible from these locations, the project is not located on steeper slopes and will not constitute ridgeline development. Mitigation measures ensuring the adverse impact is less than significant are: 1) requiring a landscape plan to screen the project site from SR 68, Reservation Road, and River Road, as well as from the adjacent neighborhood and trail; 2) building colors and materials to be earth toned to blend with the existing vicinity landscape; and 3) requiring all new utility and distribution lines on the project site to be underground.
Circulation		
Policy 1. Provide a system of pathways suitable for pedestrian and bicycle use to connect residential areas with commercial, educational and recreational areas of the project.	Consistent	As a condition of project approval, the County will require a system of pathways suitable for pedestrian and bicycle use both internal to the project and to connect the project with the existing system of pathways to other areas of Las Palmas Ranch.
Policy 3. Adequate off-street parking should be provided as a means of reducing road congestion, particularly in areas where reduced road right-of-way is proposed.	Consistent	The project meets the County standards for provision of off-street parking. The project requires a minimum of 86 parking stalls, and the project will provide 106 parking stalls.
Policy 4. Turnouts and turnaround facilities may be required to accommodate emergency vehicles in areas of reduced right-of-way or where longer cul-de-sacs are proposed.	Consistent with application of mitigation measures	Secondary access between River Road and the project site during emergency evacuations would be available through the lawn area between Country Park Road and Woodridge Court. Secondary access would not be provided on Woodridge Court between Country Park Road and the first internal parking lot aisle. Mitigation Measure TRA-3 would be required to install improvements that improve access to the lawn area and Woodridge Court. With implementation of this measure, the project would have a less than significant impact on emergency access.
Policy 5. Interior roads shall have longitudinal grades not exceeding 15 percent.	Consistent	The project is not proposing any roads with a grade of greater of 15 percent.

	Consistency	Discussion
Policy 7. The internal circulation system should be designed to accommodate a level of service "C" at full buildout. A trip generation factor of 8.0 trips per day per unit shall be used for this project.	Consistent	The Higgins traffic report evaluated the proposed project's traffic impact on the existing Las Palmas neighborhood streets that would be used to access the project. The report concluded that existing Las Palmas traffic averages about 7.1 trips per home, less than the 8.0 trip generation factor in this policy, and less than the ITE trip generation rate of 9.57 trips per home. The ITE trip generation rate for the proposed project ranges from 2.74 for assisted living facilities to 3.44 for attached senior housing. The proposed project is projected to result in 363 average trips per day. If the project site were developed with 40 medium density homes as allowed by the project site's existing zoning, the daily trip generation would be 284 (40 units x 7.1 trips per day). Therefore, the proposed project would result in about 28 percent more trips per day than would a 40-unit multi-family subdivision. However, the report concluded that even with the project, each street used to access the project would operate well below the designed carrying capacity of each street. See Section 4.3, Existing Plus Project Conditions Road Segment Operations, in the traffic report.
Policy 10. Horizontal and vertical street alignments should relate to the natural contour of the site insofar as practical, while retaining safe sight distance for expected driving speeds but not less than 25 mph.	Consistent	The proposed street alignment follows the natural contours of the site, as shown in the site plan.
Policy 14. Internal road connections should be provided where feasible between the areas of the subdivision in order to minimize the need for River Road to provide a route for intra-subdivision traffic.	Consistent	The proposed project is designed to take access from the signalized intersection at River Road and Las Palmas Road to River Run Road, then Woodridge Court. River Road is a public road maintained by the County of Monterey. Las Palmas Road, River Run Road, and Woodridge Court are private roads maintained by the Las Palmas Ranch Home Owners Association. Woodridge Court terminates at the entrance to the project site. Access to the proposed development will be by a private loop drive. Therefore, the proposed project includes an internal road connection between the proposed project and the adjacent residential subdivision, which eliminates the need for River Road to provide a route for intra-subdivision traffic.
Policy 16. The developer shall pay a development fee to the County for improvements to SR 68. This development fee shall be $620.75 per residential unit (a total of $640,000.00 being 10.66% of the estimated cost of the two lane first phase of the Corral de Tierra bypass), and shall be payable as to each residential unit at the time the building permit for the residence is issued.	Consistent	There are no residential units associated with the proposed project and therefore, this policy does not apply. However, as a condition of project approval, the applicant will be required to pay the Monterey County countywide traffic impact fee and the TAMC regional development impact fee to mitigate for the project's fair share of cumulative traffic impacts.

	Consistency	Discussion
Open Space And Conservation		
Policy 1. The following constitute the open space elements of Las Palmas Ranch to be protected: a. The Salinas River bank and the riparian vegetation adjacent thereto; b. The agricultural land north of River Road; c. The central ridge lines and north-facing frontal slopes visible from the SR 68 Scenic Corridor. d. The Corey House.	Consistent	The proposed project would not have an effect on the Salinas River bank and its associated riparian vegetation, nor would it have an effect on agricultural land north of River Road. The proposed project would not have an effect on the Corey House. The proposed project would be visible from SR 68. However, as presented in Section 5.0, *Aesthetics,* of the Draft SEIR, visual simulations from SR 68 and from Reservation Road were prepared. The simulations show that although the project would be visible from these locations, the project is not located on steeper slopes and will not constitute ridgeline development. Mitigation measures ensuring the adverse impact is less than significant are: 1) requiring a landscape plan to screen the project site from SR 68, Reservation Road, and River Road, as well as from the adjacent neighborhood and trail; 2) building colors and materials to be earth toned to blend with the existing vicinity landscape; and 3) requiring all new utility and distribution lines on the project site to be underground.
Policy 2. Prohibit building on ridgelines visible from designated scenic corridors, as delineated.	Consistent	See discussion of Open Space Policy 1 above.
Policy 10. Utilize mounding, informal massing, or irregularly spaced trees, planting and other overall landscaping treatment to screen development.	Consistent	A mitigation measure is presented in Section 5.0, *Aesthetics,* of the Draft SEIR to ensure the proposed project is adequately screened from SR 68, River Road, and Reservation Road.
Policy 11. Visually obtrusive building materials and finishes shall be avoided.	Consistent	A mitigation measure is presented in Section 5.0, *Aesthetics,* of The Draft SEIR that requires the applicant submit a final plan for colors and materials used for the buildings, which shall be earth toned to blend with the existing vicinity landscape.
Energy Conservation Policies		
Policy 1. Each residential unit should be should be afforded adequate solar access for the operation of active and passive solar systems. Locating structures with their major axis oriented within 22.5 degrees of true east/west is generally the best means to insure adequate south-facing solar access. For single-family homes, the orientation is fairly simple to implement as is full access to the south wall for passive solar design. For multi-family units, orientation and access are more difficult; generally south roof access for active space hearing or domestic water hearing systems is considered sufficient.	Consistent	The proposed project does not currently include the use of solar energy in the project materials. However, the Energy section of the Draft SEIR requires the applicants to demonstrate how the project will be consistent with this policy, prior to issuance of building permits.

	Consistency	Discussion
Policy 2. Careful design of structures to utilize solar access and to control heat loss and heat gain can achieve significant energy conservation. When these design elements are coupled with passible design features (thermal storage units, south facing glass, domestic hot water systems and other energy conserving components), the energy conservation potential greatly increases. Support structures built by the developer such as commercial areas, swimming pools, recreation and community buildings should make maximum use of alternate energy sources both to reduce operation costs and to serve as community examples.	Consistent	See the Energy Conservation Policy 1 discussion above.
Design and Sensitivity		
Policy 1. All areas of the project proposed for structural development shall be placed in a sign and design control district to ensure county enforcement of the design policies of this specific plan.	Consistent	The project site has a zoning designation of MDR/2.61-D (Medium Density Residential, 2.61 units per acre; Design Control).
Policy 3. All structures, including residential, commercial, recreational and accessory buildings; fences; walls; decks and signs shall require design approval. Approval shall be based upon conformity with the policies of this plan as well as the following specific criteria: A. Compatibility of external design, materials and colors with existing ground elevations and natural land forms. B. Conformity of design and location of structures with respect to existing ground elevations and natural land forms. C. Mitigation of visual impacts from within the development and from major designated view corridors outside of the project. D. Protection of significant trees and vegetation. Trees over 36" in circumference (four feet above the ground) shall be retained. Where it is necessary to remove such trees for better design or layout, then they shall be replaced on a two for one basis subject to the approval of the Director of Planning. E. Prevention of erosion, sedimentation and visual impacts resulting from grading, excavation, cutting or filling.	Consistent	The proposed project requires a conditional use permit and design review. A. A mitigation measure is presented in Section 5.0, *Aesthetics,* of the Draft SEIR that requires the applicant submit a final plan for colors and materials used for the buildings, which shall be earth toned to blend with the existing vicinity landscape. B. The project site is a generally level plateau, which has been identified as an acceptable building envelope from a geologic and soils perspective. The project will not result in ridgeline development or have an adverse effect on natural land forms. C. A mitigation measure is presented in Section 5.0, *Aesthetics,* of the Draft SEIR to ensure the proposed project is adequately screened from SR 68, River Road, and Reservation Road. D. The project does not include the removal of trees protected by the Monterey County Municipal Code, Chapter 16.60 – Preservation of Oak Trees and Other Protected Trees within the Toro Plan area. Eucalyptus trees are not native and therefore, are not protected by the county. E. As described in Section 11.0, *Effects Not Found to be Significant,* of the Draft SEIR, the proposed project would not have significant impacts with erosion, sedimentation, or visual impacts resulting from grading, excavation, cutting or filling. Refer to Topical Response E of this Final SEIR for more information.
Policy 4. To the extent feasible, all structures should utilize natural materials such as wood and native stone and low intensity earth-tone exterior colors. Visually obtrusive building materials shall be avoided.	Consistent	A mitigation measure is presented in Section 5.0, *Aesthetics,* of the Draft SEIR that requires the applicant submit a final plan for colors and materials used for the buildings, which shall be earth toned to blend with the existing vicinity landscape.

	Consistency	Discussion
Policy 5. Low level exterior lighting, including street lighting shall be utilized with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. Street lights may not be used unless approved as conditions of permits obtained pursuant to this plan.	Consistent	Section 5.0, *Aesthetics,* of the Draft SEIR concluded that the proposed project could have an adverse lighting effect. With implementation of Mitigation Measure AES-4, which requires all exterior lighting to be unobtrusive, down-lit, harmonious with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled, lighting impacts would be less than significant and the proposed project would be consistent with this policy.
Policy 6. Horizontal and vertical street alignments should relate to the natural contours of the site insofar as is practical. Roads which are perpendicular to viewing areas or which involve excessive cut and fill should be discouraged.	Consistent	The proposed street alignment follows the natural contours of the site, as shown in the site plan. The site is not located perpendicular to a viewing area, nor would it require excessive cut and fill.
Policy 7. Mounding, informal massing, or irregularly spaced trees, planting and other overall landscaping treatment should be utilized to screen development.	Consistent	A mitigation measure in Section 5.0, *Aesthetics,* of the Draft SEIR requires the use of mounding, informal massing, or irregularly spaced trees and plantings.
Policy 8. Preserve vegetation significant to the maintenance of visual quality and to the provision of erosion control on sensitive slopes.	Consistent	The vegetation on the slopes surrounding the development area would be preserved.
Erosion Drainage and Flood Control		
Policy 1. A comprehensive drainage plan for the entire project shall be prepared by the developer, and submitted to and approved by the County prior to final discretionary approval is given by the County for any portion of the development authorized by this specific plan.	Consistent	A Conceptual Stormwater Control Plan (Gateway Engineering 2017) was developed for the project as part of the preliminary design to address stormwater management for the project site in conformance with County and State regulatory requirements. The plan illustrates the location of impervious and pervious areas, storm flow direction and stormwater control facilities.
Policy 3. Provide drainage reports for each phase of development showing all tributary areas and information pertinent to the capability of stormwater detention and silt control facilities and mitigations for such identified impacts will be implemented.	Consistent	The proposed project design includes storm drainage facilities (collection, conveyance and disposal) as detailed in the stormwater control plan (Gateway Engineering 2017) to meet the generation of stormwater 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 stormwater flow. The stormwater control plan includes on-site stormwater control measures designed to achieve a no net increase in rate of stormwater 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.
Policy 4. Provide stormwater detention/siltation ponds so that the flow rate from development will not exceed that from the tributary areas in its natural state during a ten year design storm.	Consistent	See discussion of Erosion Drainage and Flood Control Policy 3 above.
Policy 7. Minimize disturbance or removal of existing vegetation, including trees, shrub and grasses or other ground covers.	Consistent	The project is proposed on approximately 17 percent of the project site. The remainder of the site would be retained in its existing vegetation.

	Consistency	Discussion
Policy 8. Provide engineering plans with each phase of development demonstrating that cut and fill slopes can be stabilized; the specific method of treatment and type of planting by area for each soil type and slope required to stabilize cut and fill slopes; and the time and amount of maintenance required to stabilize cut and fill slopes.	Consistent	According to the geologic hazards report and soil engineering feasibility investigation prepared for the project (Landset Engineers 2014), the steep slopes on the northerly and southerly flanks of the non-developable portion of the project site are prone to landsliding and slope failure. In order to mitigate the potential hazards from landsliding and slope instability, building foundations must be located within the geologically suitable building envelope as presented in the report. The proposed project is located within the geologically suitable building envelope, and the project would be required to comply with the recommendations of the geotechnical report as a condition of approval.
Public Facilities and Services - Water		
Policy 1. As the first priority the entire development must be served by a public utility water company providing domestic and fire flow in accordance with the requirements of State and County health and fire agencies. If a public utility water company satisfactory to the County if not feasible, then an incorporated mutual water company may perform this function.	Consistent	Water demand is evaluated in the Water Demand section of the Draft SEIR. The proposed project would have a water demand of approximately 11.4 acre feet per year (AFY). California Water Service, the water purveyor for the specific plan area, has provided a "can and will serve" for the proposed project. As presented in Table 10-2 in the Water Demand section, the 1982 EIR identified that buildout of Las Palmas Ranch would require 922 AFY. However, the Board of Supervisors modified the proposed specific plan, and the adopted specific plan required only 599 AFY. Actual water use at Las Palmas is estimated to be about 182 AFY. Therefore, with the addition of the proposed project, the total water use at Las Palmas is expected to be about 193.4 AFY, significantly less that what was allowed by the adopted specific plan.
Policy 2. Availability of water meeting the requirements of Policy No. 1 shall be demonstrated as to each increment of development prior to filing of a final subdivision map or issuance of any building permit for that increment of development.	Consistent	California Water Service, the water purveyor for the specific plan area, has provided a "can and will serve" for the proposed project.

	Consistency	Discussion
General Plan Policy		
Land Use		
LU-1.5 Land uses shall be designated to achieve compatibility with adjacent uses.	Consistent	Adjacent uses include the Las Palmas Ranch residential neighborhood to the east, open space to the south and west, and agricultural land across River Road to the north. The proposed project is located about 300 feet from the agricultural fields and is buffered by an existing grove of eucalyptus trees and River Road. The proposed project is a continuum of care residential community designed to provide care to seniors over the age of 55 and to persons with diminishing mental capacity due to Alzheimer's, dementia, or similar causes. This type of use, as well as the density and design of the proposed project, is similar to and consistent with residential uses in Las Palmas Ranch.
LU-1.9 Infill of vacant non-agricultural lands in existing developed areas and new development within designated urban service areas are a priority. Infill development shall be compatible with surrounding land use and development.	Consistent	The proposed project is located on land that is designated Medium Density Residential, is non-agricultural land, is vacant, and is located in the existing developed Las Palmas Ranch. Urban services, including water and wastewater, are available to the project.
LU-1.11 Development proposals shall be consistent with the General Plan Land Use Map designation of the subject property and the policies of this plan. (Land Use Maps for each of the following Planning Areas are shown at the end of their respective Area/Master Plan except the Coast Area, which is located at the end of this Element). a. Coast Area, Figure LU1 b. Cachagua (CACH), Figure LU2 c. Carmel Valley Master Plan, (CV), Figure LU3 d. Central Salinas Valley (CSV), Figure LU4 e. Greater Monterey Peninsula (GMP), Figure LU5 f. Fort Ord Master Plan, (FO), Figure LU6 g. Greater Salinas (GS), Figure LU7 h. North County (NC), Figure LU8 i. South County (SC), Figure LU9 j. Toro (T), Figure LU10	Consistent	The proposed project is located on land designated for Medium Density Residential (MDR) uses. The MDR designation allows for "…a range of residential uses (1-5 units/acre) and housing types, recreational, public and quasi-public, and other uses that are incidental and subordinate to the residential use and character of the area…" The proposed project meets the definition for a quasi-public use, as well as the Monterey County MDR zoning district the site is located in, and is therefore consistent with the General Plan Land Use Map designation. The proposed project also includes the following amendment to the Las Palmas Ranch Specific Plan to clarify allowance of the proposed use in the MDR district. "Assisted living facilities are conditionally allowable uses in the MDR district in that they are similar to other uses such as rest homes and public quasi-public uses currently allowed in the district. Assisted living facilities are not considered residential units and are not subject to the current 1,031 residential unit limitation of the specific plan. An assisted living facility is not considered a residential development because it does not operate or function in a manner like independent residential units. An assisted living facility may, therefore, be considered and approved through a conditional use permit on Parcel Q of Las Palmas Ranch Unit #1." The proposed project would be consistent with this policy, and with the proposed amendment this consistency would be made clear.

	Consistency	Discussion
LU-1.13 All exterior lighting shall be unobtrusive and constructed or located so that only the intended area is illuminated, long range visibility is reduced of the lighting source, and off-site glare is fully controlled. Criteria to guide the review and approval of exterior lighting shall be developed by the County in the form of enforceable design guidelines, which shall include but not be limited to guidelines for the direction of light, such as shields, where lighting is allowed.	Consistent	Section 5.0, *Aesthetics,* of the Draft SEIR concluded that the proposed project could have an adverse lighting effect. With implementation of Mitigation Measure AES-4, which requires all exterior lighting to be unobtrusive, down-lit, harmonious with the local area, and constructed or located sot that only the intended area is illuminated and off-site glare is fully controlled, lighting impacts would be less than significant and the proposed project would be consistent with this policy.
LU-1.19: Community Areas, Rural Centers and Affordable Housing Overlay districts are the top priority for development in the unincorporated areas of the County. Outside of those areas, a Development Evaluation System shall be established to provide a systematic, consistent, predictable, and quantitative method for decision-makers to evaluate developments of five or more lots or units and developments of equivalent or greater traffic, water, or wastewater intensity. The system shall be a pass-fail system and shall include a mechanism to quantitatively evaluate development in light of the policies of the General Plan and the implementing regulations, resources and infrastructure, and the overall quality of the development. Evaluation criteria shall include but are not limited to: a. Site Suitability b. Infrastructure c. Resource Management d. Proximity to a City, Community Area, or Rural Center e. Mix/Balance of uses including Affordable Housing consistent with the County Affordable/Workforce Housing Incentive Program adopted pursuant to the Monterey County Housing Element f. Environmental Impacts and Potential Mitigation g. Proximity to multiple modes of transportation h. Jobs-Housing balance within the community and between the community and surrounding areas i. Minimum passing score Residential development shall incorporate the following minimum requirements for developments in Rural Centers prior to the preparation of an Infrastructure and Financing Study, or outside of a Community Area or Rural Center: 1) 35% affordable/Workforce housing (25% inclusionary; 10% Workforce) for projects of five or more units to be considered. 2) If the project is designed with at least 15% farmworker inclusionary housing, the minimum requirement may be reduced to 30% total. This Development Evaluation System shall be established within 12 months of adopting this General Plan.	Consistent	The project site is not within a Community Area, Rural Center, or Affordable Housing Overlay District. Thus, the project should be analyzed pursuant to the Development Evaluation System (DES) required by this policy. Pending adoption of a detailed program implementing the DES, the County has been implementing the DES through application of the criteria in LU-1.19. Accordingly, an interim analysis has been completed for this project based on the Policy LU 1.19 criteria. The objective of the DES is to strongly discourage or avoid "leap frog" development not proximate to urbanized or community areas where public services and facilities exist. The project meets this objective of the DES. This proposed project is infill in nature and is the last developable site in the LPRSP area, near existing communities, major roadways, and services. The proposed project is consistent with the majority of the specified DES criteria, if the criteria are deemed to apply to an infill location such as the subject site. The affordable housing and jobs-housing balance criteria do not apply because the proposed project is not residential. In terms of "site suitability," "proximity to cities and communities," and "multiple modes of transportation," the project's location near an existing residential development makes the site suitable for the assisted living use proposed. The proposed site is less than 2 miles from the River Road Rural Center. The site's location provides efficient access to SR 68 via River Road, the major transportation corridor to the west of the site. Residents of the proposed project are not expected to need significant services outside of those provided at the assisted care facility, but the nearby Monterey Peninsula communities of Spreckels, Creekside, and Salinas are within short travel distance of the site and offer a wide range of commercial and personal services and medical care facilities if desired. The project will also include walking paths, and the applicants have proposed shuttle services for residents to access areas on the Monterey Peninsula and Salinas, including regular shuttle service for employees to transportation hubs nearby, as not all residents will have access to personal vehicles. Regarding "infrastructure and services," the site has received a "can and will serve" letter from Cal Water and, as discussed above in the LPRSP

	Consistency	Discussion
		analysis above under "Public Facilities and Services – Water", total water use at Las Palmas is expected to be about 193.4 AFY, significantly less than the 599 AFY that was allowed by the adopted specific plan. Additional infrastructure is existing or will be built concurrently with the project so the project site will be adequately served. Finally, regarding "resource management" and "environmental impacts and potential mitigations," the project would result in significant but mitigatable impacts on special status animal species. Construction of the proposed project could directly impact American badger, Monterey dusky-footed woodrat, western red bat, burrowing owl or nesting birds. This impact is also considered significant but mitigatable. In summary, when considered in relation to the DES criteria specified in General Plan Policy LU-1.19, the project is, overall, consistent with LU-1.19.
LU-8.1 The open space needs of the community and new development shall be reviewed and addressed through the planning process. The extent of use of land for this designation shall be limited to building coverage of 25% of the subject property.	Consistent	The project site is 15.67 acres. Proposed building coverage totals 90,006 square feet (approximately 2.1 acres). Therefore, total building coverage is approximately 13 percent.
Circulation		
C-1.1 The acceptable level of service for County roads and intersections shall be Level of Service (LOS) D, except as follows: a. Acceptable level of service for County roads in Community Areas may be reduced below LOS D through the Community Plan process. b. County roads operating at LOS D or below at the time of adopting this General Plan shall not be allowed to be degraded further except in Community Areas where a lower LOS may be approved through the Community Plan process. c. Area Plans prepared for County Planning Areas may establish an acceptable level of service for County roads other than LOS D. The benefits which justify less than LOS D shall be identified in the Area Plan. Where an Area Plan does not establish a separate LOS, the standard LOS D shall apply.	Consistent	The traffic report includes an evaluation of project impacts at the River Road/Las Palmas Road intersection, which would be the county intersection most affected by the proposed project. The intersection currently operates at level of service A, with a 4.9 second delay in the AM peak hour, and LOS A with a 4.2 second delay in the PM peak hour. With the addition of project traffic, the intersection would continue to operate at LOS A with a 5.0 second delay in the AM peak hour, and LOS A with a 4.4 second delay in the PM peak hour. Therefore, the proposed project would be consistent with this policy. The Toro Area Plan does not establish a separate level of service.
C-1.3 Circulation improvements that mitigate Traffic Tier 1 direct on-site and off-site project impacts shall be constructed concurrently (as defined in subparagraph (a) only of the definition for "concurrency") with new development. Off-site circulation improvements that mitigate Traffic Tier 2 or Traffic Tier 3 impacts either shall: a. be constructed concurrently with new development, or b. a fair share payment pursuant to Policy C-1.8 (County Traffic Impact Fee), Policy C-1.11 (Regional Development Impact Fee), and /or other applicable traffic fee programs shall be made at the discretion of the County.	Consistent	According to the traffic report (Exhibit 5, Intersection Levels of Service) the project would not result in significant impacts at the studied intersections, and with minimal increases in the existing delays at the intersections. Therefore, there are no Tier 1 project impacts to mitigate. However, under cumulative project conditions, the SR 68 intersections with Reservation Road and River Road would operate at unacceptable LOS D in one of the peak hours. Although the project's contribution to the traffic at these intersections would be minimal, the project would be required to pay the appropriate impact fees (county and TAMC) to mitigate for the project's share of the necessary improvements to these intersections, in accordance

	Consistency	Discussion
Note: Tier 1 means impacts that are direct impacts on site, or off-site, but in the immediate vicinity of the project. *Tier 2 means direct or cumulative impacts to county roadways not in the immediate vicinity of development.* *Tier 3 means impacts to regional roadways and highways identified in the TAMC Regional Development Impact Fee Program.*		with Policy C-1.8 and Policy C-1.11. These Tier 2 impacts would be mitigated though the payment of these impact fees. Additionally, the project would add one or more trips to SR 68 in the AM and PM peak hours, which is currently operating at unacceptable LOS F. This Tier 3 impact is also mitigated with the payment of county and TAMC fees. However, the impact is still considered significant and unavoidable, as there are currently no definitive plans to improvement SR 68 operations to an acceptable level of service.
C-1.4 Not withstanding Policy C-1.3, projects that are found to result in reducing a County road below the acceptable LOS standard shall not be allowed to proceed unless the construction of the development and its associated improvements are phased in a manner that will maintain the acceptable LOS for all affected County roads. Where the LOS of a County road impacted by a specific project currently operates below LOS D and is listed on the CIFP as a high priority, Policy C-1.3 shall apply. Where the LOS of a County road impacted by a specific project currently operates below LOS D and is not listed on the CIFP as a high priority, development shall mitigate project impacts concurrently. The following are exempt from this Policy except that they shall be required to pay any applicable fair share fee pursuant to Policies C-1.8, C-1.11, and /or other applicable traffic fee programs: a. first single family dwelling on a lot of record; b. allowable non-habitable accessory structures on an existing lot of record; c. accessory units consistent with other policies and State Second Unit Housing law; d. Any use in a non-residential designation for which a discretionary permit is not required or for which the traffic generated is equivalent to no more than that generated by a single family residence (10 ADT); and e. Minimal use on a vacant lot in a non-residential designation sufficient to enable the owner to derive some economically viable use of the parcel.	Consistent	According to the traffic report, and as discussed in C-1.3 above, the project would not result in reducing a county road below the acceptable LOS standard.
C-1.11 In addition to the County Traffic Impact Fee established in Policy C-1.8, the County shall require new development to pay a Regional Traffic Impact Fee developed collaboratively between TAMC, the County, and other local and state agencies to ensure a funding mechanism for regional transportation improvements mitigating Traffic Tier 3 impacts.	Consistent.	As described above under General Plan policy C-1.3, the project would be required to pay the appropriate Regional Traffic Impact Fee to mitigate for the project's share of the necessary improvements the SR 68 intersections with Reservation Road and River Road. These Tier 2 impacts would be mitigated though the payment of these impact fees.

	Consistency	Discussion
C-2.7 New development shall be located and designed with convenient access and efficient transportation for all intended users and, where possible, consider alternative transportation modes.	Consistent	Monterey-Salinas Transit does not serve development along River Road. The applicants propose shuttle services for residents to access areas on the Monterey Peninsula and Salinas, including regular shuttle service for employees to transportation hubs nearby. The nearest MST bus stop is located at Creekside Terrace and Reservation Road, approximate 1.1 miles from the entrance to the project site. With implementation of the applicant-proposed shuttle service, the project would be consistent with this policy.
C-3.4 Strategies to encourage travel in non-peak hours shall be supported.	Consistent	The project includes a mitigation measure to schedule shift changes outside of morning and evening peak commute hours.
C-3.5 Transportation alternatives such as bicycles, car pools, public transit, and compact vehicles shall be encouraged and accommodated within and outside the public right-of-way and may be included as part of an Area Plan and also in Policy OS-1.10.	Consistent	See discussion of Policy C-2.7 above.
Conservation and Open Space		
OS-1.2 Development in designated visually sensitive areas shall be subordinate to the natural features of the area.	Consistent	The project site is located within an area designated "sensitive viewshed." Section 5.0, *Aesthetics,* of the Draft SEIR included visual simulations from SR 68 and from Reservation Road. The simulations show that although the project would be visible from these locations, the project is not located on steeper slopes and would not constitute ridgeline development. Mitigation measures ensuring the adverse impact is less than significant are: 1) requiring a landscape plan to screen the project site from SR 68, Reservation Road, and River Road, as well as from the adjacent neighborhood and trail; 2) building colors and materials to be earth toned to blend with the existing vicinity landscape; and 3) requiring all new utility and distribution lines on the project site to be underground.
OS-1.3 To preserve the County's scenic qualities, ridgeline development shall not be allowed. An exception to this policy may be made only after publicly noticed hearing and provided the following findings can be made: a. The ridgeline development will not create a substantially adverse visual impact when viewed from a common public viewing area; and either, b. The proposed development better achieves the goals, policies and objectives of the Monterey County General Plan and applicable area plan than other development alternatives; or, c. There is no feasible alternative to the ridgeline development. Pursuant to Policy OS-1.6, in areas subject to specific plans, the ridgeline policies and regulations of the applicable specific plan shall govern.	Consistent	See discussion of Policy OS-1.2 above. The proposed project would not result in ridgeline development.

	Consistency	Discussion
OS-1.6 In areas subject to specific plans, the ridgeline policies and regulations of the applicable specific plan shall govern. Each specific plan shall address viewshed issues, including ridgeline development, as part of the plan, including, but not limited to, provisions for setbacks, landscaping, height limits, or open space buffers.	Consistent	See discussion of Policy OS-1.2 above, as well as the specific plan policy discussions presented earlier. The proposed project would not result in ridgeline development.
OS-1-9 Development that protects and enhances the County's scenic qualities shall be encouraged.	Consistent	See discussion of Policy OS-1.2 above.
OS-1.12 The significant disruption of views from designated scenic routes shall be mitigated through use of appropriate materials, scale, lighting and siting of development	Consistent	See discussion of Policy OS-1.2 above.
OS-3.5 The County shall regulate activity on slopes to reduce impacts to water quality and biological resources: 1) Non-Agricultural. a) Development on slopes in excess of twenty five percent (25%) shall be prohibited except as stated below; however, such development may be allowed pursuant to a discretionary permit if one or both of the following findings are made, based upon substantial evidence: 1. there is no feasible alternative which would allow development to occur on slopes of less than 25%; 2. the proposed development better achieves the resource protection objectives and policies contained in the Monterey County General Plan, accompanying Area Plans, and all applicable master plans. b) Development on slopes greater than 25% or that contain geologic hazards and constraints shown on the County's GIS Geologic (Policy S-1.2) or Hydrologic (Policy PS-2.6) Hazard Databases shall require adequate special erosion control and construction techniques and the discretionary permit shall: 1. evaluate possible building site alternatives that better meet the goals and policies of the general plan; 2. identify development and design techniques for erosion control, slope stabilization, visual mitigation, drainage, and construction techniques; and 3. minimize development in areas where potentially unstable slopes, soil and geologic conditions, or sewage disposal pose substantial risk to public health or safety. c) Where proposed development impacting slopes in excess of twenty five percent (25%) does not exceed ten percent (10%), or 500 square feet of the	Consistent	According to a slope map exhibit prepared by Gateway Engineering for the applicant, the project site area has approximately 0.6 acres with slopes greater than 25 percent, which represents 7.5 percent of the proposed eight-acre development area of the project site. A portion of the upper loop road and portions of four casitas are on slopes over 25 percent. This area generally consists of non-native grasslands (see Section 7.0, *Biological Resources* of the Draft SEIR) and no significant biological resources were identified in this area. The loop road is essential to fire protection and project circulation. It may be possible to relocate some of the casitas units, but that may require they be placed closer to the homes in Las Palmas #1 and would result in potential loss of privacy to those homes. Relocation would also result in additional grading for fire department access, parking areas, and would elevate a number of the casitas units on the site which could increase visibility. Because there is no feasible alternative to completely avoid the 25% slopes and because the project achieves the resource protection objectives and policies contained in the Monterey County General Plan, accompanying Area Plans, and all applicable master plans, findings for a discretionary permit can be made and the project would be considered consistent with this policy.

	Consistency	Discussion
total development footprint (whichever is less), a discretionary permit shall not be required. d) It is the general policy of the County to require dedication of a scenic easement on a slope exceeding twenty five percent (25%).		
OS-5.4 Development shall avoid, minimize, and mitigate impacts to listed species and critical habitat to the extent feasible. Measures may include but are not limited to: a. clustering lots for development to avoid critical habitat areas, b. dedications of permanent conservation easements; or c. other appropriate means. If development may affect listed species, consultation with United States Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG) may be required and impacts may be mitigated by expanding the resource elsewhere on-site or within close proximity off-site. Final mitigation requirements would be determined as required by law.	Consistent	The project site does not contain habitat for listed species and is not designated critical habitat. However, the project site does contain habitat for several plant and wildlife species of special concern. Potential plant species include Congdon's tarplant, fragrant fritillary, Hickman's onion, Hutchinson's larkspur, and Santa Cruz microseris. Potential wildlife species include American badger, burrowing owl, Monterey dusky-footed woodrat, hoary bat, western red bat, nesting raptors, and migratory birds. Several pre-construction mitigation measures are presented in Section 7.0, *Biological Resources,* of the Draft SEIR that would reduce potential impacts to these plant and wildlife species should they occur on the project site prior to construction activities.
OS-5.5 Landowners and developers shall be encouraged to preserve the integrity of existing terrain and native vegetation in visually sensitive areas such as hillsides, ridges, and watersheds. Routine and Ongoing Agricultural Activities shall be exempt from this policy.	Consistent	The project site is located within an area designated "sensitive viewshed." Approximately 27.6 percent of the project site is proposed for development. The balance will be retained in open space. According to Section 7.0, *Biological Resources,* of the Draft SEIR, most of the site supports non-native grassland and other prevalent non-native species. Various native wildflowers and other herbaceous plants occur seasonally in the grassland habitat at low densities. Scattered native shrubs are also present in some areas. Mature native coast live oaks are present on the hillsides outside the development area. The proposed project includes the removal of approximately 40 non-native eucalyptus trees, retains other non-native eucalyptus trees, and does not include removal of native oak trees.
OS-5.10 Regulations for tree removal, including Timberland Conversion, shall be established and maintained by ordinance, implementing Area Plan policies that address the following: a. Criteria when a permit is required including: 1. number of trees, 2. minimum size of tree, 3. Post Timberland conversion land-use b. How size is measured for each protected species of tree, and what constitutes a landmark tree depending on the rate of growth for that species. c. Hazardous trees	Consistent	The only trees proposed for removal are non-native eucalyptus trees, which are not a protected species of tree. No County-regulated native trees are proposed for removal.

	Consistency	Discussion
d. Pest and disease abatement e. Replacement criteria f. Ensure minimal removal		
OS-5.16 A biological study shall be required for any development project requiring a discretionary permit and having the potential to 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, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.	Consistent	The applicant prepared biological studies (Regan Biological and Horticultural Consulting December 2011 and October 2013) and the Draft SEIR consultant EMC Planning Group biologist reviewed those studies, conducted a site visit, and prepared an independent analysis that is included in Section 7.0, *Biological Resources,* of the Draft SEIR. However, the project site does contain habitat for several plant and wildlife species of special concern which could be adversely affected by development of the project. Potential plant species include Congdon's tarplant, fragrant fritillary, Hickman's onion, Hutchinson's larkspur, and Santa Cruz microseris. Potential wildlife species include American badger, burrowing owl, Monterey dusky-footed woodrat, hoary bat, western red bat, nesting raptors, and migratory birds. Several pre-construction mitigation measures are presented in Section 7.0, *Biological Resources,* of the Draft SEIR, that would reduce potential impacts to these plant and wildlife species should they occur on the project site prior to construction activities. Therefore, the proposed project does not have the potential to 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, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.
OS-5.24 The County shall require discretionary projects to retain movement corridors of adequate size and habitat quality to allow for continued wildlife use based on the needs of the species occupying the habitat. The County shall require that expansion of its roadways and public infrastructure projects provide movement opportunities for terrestrial wildlife and ensure that existing stream channels and riparian corridors continue to provide for wildlife movement and access.	Consistent	The proposed project would impede to a limited degree the local movement of common wildlife due to habitat loss. However, the site does not function as a regional wildlife movement corridor or habitat linkage, and therefore, the proposed project would not disrupt movement corridors to allow for continued wildlife use in the vicinity.
OS-5.25 Occupied nests of statutorily protected migratory birds and raptors shall not be disturbed during the breeding season (generally February 1 to September 15). The county shall A. Consult, or require the developer to consult, with a qualified biologist prior to any site preparation or construction work in order to: (1) determine whether work is proposed during nesting season for migratory birds or raptors,	Consistent.	An evaluation of potential impacts to nesting birds and raptors is included in Section 7.0, *Biological Resources,* of the Draft SEIR. Mitigation measure BIO-6 requires pre-construction surveys if any construction-related activities will take place during the nesting bird season.

	Consistency	Discussion
(2) determine whether site vegetation is suitable to nesting migratory birds or raptors, (3) identify any regulatory requirements for setbacks or other avoidance measures for migratory birds and raptors which could nest on the site, and (4) establish project-specific requirements for setbacks, lock-out periods, or other methods of avoidance of disruption of nesting birds. B. Require the development to follow the recommendations of the biologist. This measure may be implemented in one of two ways: (1) preconstruction surveys may be conducted to identify active nests and, if found, adequate buffers shall be provided to avoid active nest disruption until after the young have fledged; or (2) vegetation removal may be conducted during the non-breeding season (generally September 16 to January 31); however, removal of vegetation along waterways shall require approval of all appropriate local, state, and federal agencies. This policy shall not apply in the case of an emergency fire event requiring tree removal. This policy shall apply for tree removal that addresses fire safety planning, since removal can be scheduled to reduce impacts to migratory birds and raptors.		
OS-6.4 Development proposed in low sensitivity zones are not required to have an archaeological survey unless there is specific additional information that suggests archaeological resources are present.	Consistent	According to the Monterey County General Plan Archaeological Sensitivity Map, the project site is located in an area of low archaeological sensitivity; thus, the likelihood of resources being present on the project site is low. Therefore, no archaeological survey was conducted for the project site.
OS-9.1 The use of solar, wind and other renewable resources for agricultural, residential, commercial, industrial, and public building applications shall be encouraged.	Consistent	The project would be required to comply with all applicable County ordinances and the current California Building Code in effect at the time the project is constructed. The Energy Conservation policies of the Las Palmas Ranch Specific Plan require the use of renewable energy. While the proposed project does not include the use of solar, wind, or other renewable resources, Section 12.0, *Energy,* the Draft SEIR includes a mitigation measure requiring the developer to demonstrate consistency with these energy conservation policies prior to issuance of building permits.
OS-10.2 Mass transit, bicycles, pedestrian modes of transportation, and other transportation alternatives to automobiles shall be encouraged.	Consistent	Monterey-Salinas Transit does not serve development along River Road. The applicants propose shuttle services for residents to access areas on the Monterey Peninsula and Salinas, including regular shuttle service for employees to transportation hubs nearby. The nearest MST bus stop is located at Creekside Terrace and Reservation Road, approximately 1.1 miles

	Consistency	Discussion
		from the entrance to the project site. With implementation of the shuttle service, the project would be consistent with this policy.

	Consistency	Discussion
OS-10.9 The County of Monterey shall require that future development implement applicable Monterey Bay Unified Air Pollution Control District control measures. Applicants for discretionary projects shall work with the Monterey Bay Unified Air Pollution Control District to incorporate feasible measures that assure that health-based standards for diesel particulate emissions are met. The County of Monterey will require that future construction operate and implement MBUAPCD PM_{10} control measures to ensure that construction-related PM_{10} emissions do not exceed the MBUAPCD's daily threshold for PM_{10}. The County shall implement MBUAPCD measures to address off-road mobile source and heavy duty equipment emissions as conditions of approval for future development to ensure that construction-related NO_x emissions from non-typical construction equipment do not exceed the MBUAPCD's daily threshold for NO_x.	Consistent	A mitigation measure presented in Section 6.0, *Air Quality*, the Draft SEIR requires the developer to maintain and properly tune all off-road construction vehicles and equipment in accordance with the manufacturer's specifications and to implement several measures to ensure that construction-related NO_x and PM_{10} emissions are less than significant.
Safety		
S-1.1 Land uses shall be sited and measures applied to reduce the potential for loss of life, injury, property damage, and economic and social dislocations resulting from ground shaking, liquefaction, landslides, and other geologic hazards in the high and moderate hazard susceptibility areas.	Consistent	According to the geologic hazards report and soil engineering feasibility investigation prepared for the project (Landset Engineers 2014), 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. 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 a condition of project approval, all recommendations in the report would be required.
S-1.3 Site-specific geologic studies may be used to verify the presence or absence and extent of the hazard on the property proposed for new development and to identify mitigation measures for any development proposed. An ordinance including permit requirements relative to the siting and design of structures and grading relative to seismic hazards shall be established.	Consistent	See discussion of Policy S-1.1 above.
S-1.7 Site-specific reports addressing geologic hazard and geotechnical conditions shall be required as part of the planning phase and review of discretionary development entitlements and as part of review of ministerial permits in accordance with the California Building Standards Code as follows: a. Geotechnical reports prepared by State of California licensed Registered Geotechnical Engineers are required during building plan review for all habitable structures and habitable additions over 500 square feet in footprint area. Additions less than 500 square feet and non-habitable buildings may require geotechnical reports as determined by the pre-site inspection. b. A Registered Geotechnical Engineer shall be required to review and approve the foundation conditions prior to plan check approval, and if recommended	Consistent	See discussion of Policy S-1.1 above.

	Consistency	Discussion
by the report, shall perform a site inspection to verify the foundation prior to approval to pour the footings. Setbacks shall be identified and verified in the field prior to construction. c. All new development and subdivision applications in State- or County-designated Earthquake Fault Zones shall provide a geologic report addressing the potential for surface fault rupture and secondary fracturing adjacent to the fault zone before the application is considered complete. The report shall be prepared by a Registered Geologist or a Certified Engineering Geologist and conform to the State of California's most current Guidelines for evaluating the hazard of surface fault rupture. d. Geologic reports and supplemental geotechnical reports for foundation design shall be required in areas with moderate or high landslide or liquefaction susceptibility to evaluate the potential on- and off-site impacts on subdivision layouts, grading, or building structures. e. Where geologic reports with supplemental geotechnical reports determine that potential hazards effecting new development do not lead to an unacceptable level of risk to life and property, development in all Land Use Designations may be permissible, so long as all other applicable General Plan policies are complied with. f. Appropriate site-specific mitigation measures and mitigation monitoring to protect public health and safety, including deed restrictions, shall be required.		
S-1.8 As part of the planning phase and review of discretionary development entitlements, and as part of review of ministerial permits in accordance with the California Building Standards Code, new development may be approved only if it can be demonstrated that the site is physically suitable and the development will neither create nor significantly contribute to geologic instability or geologic hazards.	Consistent	See discussion of policy S-1.1 above.
S-3.1 Post-development, off-site peak flow drainage from the area being developed shall not be greater than pre-development peak flow drainage. On-site improvements or other methods for stormwater detention shall be required to maintain post-development, off-site, peak flows at no greater than predevelopment levels, where appropriate, as determined by the Monterey County Water Resources Agency.	Consistent	The proposed project design includes storm drainage facilities (collection, conveyance and disposal) as detailed in the stormwater control plan (Gateway Engineering 2017) to meet the generation of stormwater 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 stormwater flow. The stormwater control plan includes on-site stormwater control measures designed to achieve a no net increase in rate of stormwater 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.

	Consistency	Discussion
S-3.2 Best Management Practices to protect groundwater and surface water quality shall be incorporated into all development.	Consistent	The proposed project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Stormwater 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 stormwater runoff during construction.
S-3.9 In order to minimize urban runoff affecting water quality, the County shall require all future development within urban and suburban areas to implement Best Management Practices (BMPs) as approved in the Monterey Regional Stormwater Management Program which are designed to incorporate Low Impact Development techniques. BMPs may include, but are not limited to, grassy swales, rain gardens, bioretention cells, and tree box filters. BMPs should preserve as much native vegetation as feasible possible on the project site.	Consistent	See discussion of Policy S-3.2 above.
S-4.11 The County shall require all new development to be provided with automatic fire protection systems (such as fire breaks, fire-retardant building materials, automatic sprinkler systems, and/or water storage tanks) approved by the fire jurisdiction.	Consistent	The proposed project would be required to meet the minimum requirements in the Title 24 California Building Standards Code. Chapter 7, Fire and Smoke Protection Features and Chapter 9, Fire Protection Systems, address this requirement.
S-4.13 The County shall require all new development to have adequate water available for fire suppression. The water system shall comply with Monterey County Code Chapter 18.56, NFPA Standard 1142, or other nationally recognized standard. The fire authority having jurisdiction, the County Departments of Planning and Building Services, and all other regulatory agencies shall determine the adequacy and location of water supply and/or storage to be provided.	Consistent	The California Water Service Company performed a fire flow test on November 10, 2010. Required fire flow for the proposed project is 3,750 gallons per minute for a duration of three hours. The fire flow test concluded an available flow of up to 6,429 gallons per minute, meeting the requirement for adequate water available for fire suppression.
S-4.22 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, and other nationally recognized standards.	Consistent	The proposed project would be required to meet the state building code, state fire code, and Monterey County Code Chapter 18.56 as a condition of approval.
S-7.1 New noise-sensitive land uses may only be allowed in areas where existing (Figures 9 A-H) and projected (Figures 10 A-E) noise levels are "acceptable" according to "Land Use Compatibility for Community Noise Table" (Table S-2, next page). A Community Noise Ordinance shall be established consistent with said Table that addresses, but is not limited to the following (Noise level maps are located at the end of this Element): a. Capacity-related roadway improvement projects. b. Construction-related noise impacts on adjacent land uses.	Consistent	Table S-2, Community Noise Exposure, identifies acceptable noise levels for various land use categories. The proposed project would fall under the "nursing home" category, which identifies 70 dB and below as normally acceptable. According to General Plan Figure 10C, Greater Monterey Peninsula, Carmel Valley and Toro Projected Noise Contours, the noise at the project site is below 60. Noise measurements conducted for the Final SEIR confirm that noise interior to the project site is below 60. Refer to Topical Response H in the Final SEIR for more information.

	Consistency	Discussion
c. New residential land uses exposed to aircraft operations at any airport or air base. d. Site planning and project design techniques to achieve acceptable noise levels such as: building orientation, setbacks, earthen berms, and building construction practices. The use of masonry sound walls for noise control in rural areas shall be discouraged. e. Design elements necessary to mitigate significant adverse noise impacts on surrounding land uses. f. Impulse noise. g. Existing railroad locations & noise levels.		
S-7.10 Construction projects shall include the following standard noise protection measures: ▪ Construction shall occur only during times allowed by ordinance/code unless such limits are waived for public convenience; ▪ All equipment shall have properly operating mufflers; and ▪ Lay-down yards and semi-stationary equipment such as pumps or generators shall be located as far from noise-sensitive land uses as practical.	Consistent	Construction noise is quantified in Topical Response H of the Final SEIR. Adherence to construction noise restrictions in the Monterey County Code Chapter 10.60.40 and Monterey County General Plan Policies S-7.9 and S-7.10 would substantially reduce the exposure of sensitive receptors to temporary increases in construction noise, especially during sensitive evening and nighttime hours. As a condition of approval, the County would require that the project adhere to these General Plan policies to minimize construction noise. These requirements would reduce construction-related noise impacts to less than significant.
Public Services		
PS-2.3 New development shall be required to connect to existing water service providers where feasible. Connection to public utilities is preferable to other providers.	Consistent	The proposed project would connect to the existing Las Palmas system, operated by California American Water. California American Water has provided a "can and will serve" letter for the proposed project.
PS-2.8 The County shall require that all projects be designed to maintain or increase the site's pre-development absorption of rainfall (minimize runoff), and to recharge groundwater where appropriate. Implementation shall include standards that could regulate impervious surfaces, vary by project type, land use, soils and area characteristics, and provide for water impoundments (retention/detention structures), protecting and planting vegetation, use of permeable paving materials, bioswales, water gardens, and cisterns, and other measures to increase runoff retention, protect water quality, and enhance groundwater recharge.	Consistent	The proposed project design includes storm drainage facilities (collection, conveyance and disposal) as detailed in the stormwater control plan (Gateway Engineering 2017) to meet the generation of stormwater 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 stormwater flow. The stormwater control plan includes on-site stormwater control measures designed to achieve a no net increase in rate of stormwater 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. According to the 2010 General Plan Draft EIR (page 4.3-5), During spring and summer, the two reservoirs on the Nacimiento and San Antonio rivers regulate flow to minimize outflow to the ocean and maximize groundwater recharge through the Salinas River bed. Under current reservoir operations, water is released into the river during summer to recharge groundwater in

	Consistency	Discussion
		the basin. The proposed project will not affect the ability of groundwater recharge at the Salinas River. See also the discussion of Policy S-3.1 presented earlier.
PS-3.1 Except as specifically set forth below, new development for which a discretionary permit is required, and that will use or require the use of water, shall be prohibited without proof, based on specific findings and supported by evidence, that there is a long-term, sustainable water supply, both in quality and quantity to serve the development. This requirement shall not apply to: a) The first single family dwelling and non-habitable accessory uses on an existing lot of record; or b) Specified development (a list to be developed by ordinance) designed to provide: a) public infrastructure or b) private infrastructure that provides critical or necessary services to the public, and that will have a minor or insubstantial net use of water (e.g. water facilities, wastewater treatment facilities, road construction projects, recycling or solid waste transfer facilities; or c) Development within Zone 2C of the Salinas Valley groundwater basin, provided the County prepares or causes to be prepared a study for the Board of Supervisors regarding Zone 2C, to be completed no earlier than October 31, 2017 and no later than March 31, 2018 that does the following: d) Evaluates existing data for seawater intrusion and groundwater levels collected by Monterey County Water Resources Agency as of the date the study is commenced. e) Evaluates the total water demand for all existing uses and future uses designated in the General Plan EIR for the year 2030; f) Assesses and provides conclusions regarding the degree to which the total water demand for all uses designated in the General Plan for the year 2030 are likely to be reached or exceeded; g) Evaluates on an annual basis during the study period groundwater elevations and the seawater intrusion boundary; h) Based on historical data and the data produced by the study, evaluates and provides conclusions regarding future trends and any expected movement of groundwater elevations and the seawater intrusion boundary; i) Should the study conclude that i) total water demand for all uses designated in the General Plan for the year 2030 is likely to be exceeded; or ii) groundwater elevations are likely to decline by the year 2030 and iii) the seawater intrusion boundary is likely to advance inland by the year 2030, the study shall make recommendations on measures the County could take to address any or all of those conditions; and	Consistent	Water demand is evaluated in Section 10.0, *Water Supply,* of the Draft SEIR. The proposed project would have a water demand of approximately 11.4 acre feet per year (AFY). California Water Service, the water purveyor for the specific plan area, has provided a "can and will serve" for the proposed project. As presented in Table 10-2 in the Water Demand section, the 1982 EIR identified that buildout of Las Palmas Ranch would require 922 AFY. However, the Board of Supervisors modified the proposed specific plan, and the adopted specific plan required only 599 AFY. Actual water use at Las Palmas is estimated to be about 182 AFY. Therefore, with the addition of the proposed project, the total water use at Las Palmas is expected to be about 193.4 AFY, significantly less that what was allowed by the adopted specific plan. The first component of policy PS-3.1 is the requirement to provide proof of a sustainable water supply to serve the development. Policy PS-3.1 includes an exception to development in Zone 2C of the Salinas Valley groundwater basin, which would include the proposed project. Instead, the provisions of subsection c. of the policy are applicable. Subsection c. requires the County to conduct a specific study on Zone 2C, conduct a hearing on the study results, adopt measures to address identified conditions, and prepare a report every 5 years on the results of any measures. The requisite study and related actions have not been conducted. Subsection c. further provides, "This exception for Zone 2C shall be a rebuttable presumption that a Long Term Sustainable Water Supply exists within Zone 2C, and the presumption shall remain in effect until and unless the study reaches the conclusion for Zone 2C identified in subsection 6) i or 6) ii and 6) iii. Development in Zone 2C shall be subject to all other policies of the General Plan and applicable Area Plan. Based on these considerations, the project is consistent with Policy PS-3.1, and the availability of a long-term water supply will be further discussed in conjunction with other policies below.

	Consistency	Discussion
j) Addresses such other matters as the Board of Supervisors determines are appropriate. Within two months following the completion of the study, the Board of Supervisors shall hold an open and noticed public hearing on the results of the study. If the study reaches the conclusions for Zone 2C identified in subsection 6) i or 6) ii and 6) iii, the Board of Supervisors shall adopt one or more measures identified in the study, or other appropriate measures, to address the identified conditions. This exception for Zone 2C shall be a rebuttable presumption that a Long Term Sustainable Water Supply exists within Zone 2C, and the presumption shall remain in effect until and unless the study reaches the conclusion for Zone 2C identified in subsection 6) i or 6) ii and 6) iii. Development in Zone 2C shall be subject to all other policies of the General Plan and applicable Area Plan. Following completion of the study described herein, and the adoption of measures as may be recommended in the study, if any, the County shall prepare a report to the Board of Supervisors every five (5) years for Zone 2C that examines the degree to which a) total water demand for all uses predicted in the General Plan EIR for year 2030 will be reached; or b) groundwater elevations, the seawater intrusion boundary have changed since the prior reporting period; and c) other sources of water supply are available.		
PS-3.2 Specific criteria for proof of a Long Term Sustainable Water Supply and an Adequate Water Supply System for new development requiring a discretionary permit, including but not limited to residential or commercial subdivisions, shall be developed by ordinance with the advice of the General Manager of the Water Resources Agency and the Director of the Environmental Health Bureau. A determination of a Long Term Sustainable Water Supply shall be made upon the advice of the General Manager of the Water Resources Agency. The following factors shall be used in developing the criteria for proof of a long term sustainable water supply and an adequate water supply system: a. Water quality; b. Authorized production capacity of a facility operating pursuant to a permit from a regulatory agency, production capability, and any adverse effect on the economic extraction of water or other effect on wells in the immediate vicinity, including recovery rates; c. Technical, managerial, and financial capability of the water purveyor or water system operator; d. The source of the water supply and the nature of the right(s) to water from the source;	Consistent	This policy provides guidance and criteria for the development of a County ordinance outlining the requirements for proof of a long term sustainable water supply and an adequate water supply system for new development requiring a discretionary permit. Thus, this policy is relevant to development of an ordinance that could be applied to the proposed project. Nonetheless, this project is reviewed below applying these criteria: ▪ Water is the same quality as current local California Water Service wells and is thus, of acceptable water quality. ▪ The analysis in the Draft SEIR (Section 10.0, *Water Supply*, p. 10-11) shows that the project would use 11.4 acre-feet of water per year (AFY), approved Specific Plan anticipated uses associated with 599-AFY, and is using only 182 AFY. With consideration of the proposed project, total water use in the entire Specific Plan Area would be 194 AFY. In addition, common area landscape irrigation would use recycled water, resulting in less than 11.4 AFY of potable water demand. The project water would demand represents a 0.002 percent increase in the annual groundwater extraction for Zone 2C. California Water Service has confirmed that it can and will serve the project, which indicates the applicable water purveyor for the site is able to provide water supply for the proposed project. See updated will-serve letter from California Water Service dated March 26, 2019 in Appendix I-2.

	Consistency	Discussion
e. Cumulative impacts of existing and projected future demand for water from the source, and the ability to reverse trends contributing to an overdraft condition or otherwise affecting supply; and f. Effects of additional extraction or diversion of water on the environment including on in-stream flows necessary to support riparian vegetation, wetlands, fish or other aquatic life, and the migration potential for steelhead, for the purpose of minimizing impacts on the environment and to those resources and species. g. Completion and operation of new projects, or implementation of best practices, to renew or sustain aquifer or basin functions. The hauling of water shall not be a factor nor a criterion for the proof of a long term sustainable water supply.		▪ California Water Service has demonstrated its technical, managerial and financial capabilities to deliver water. ▪ Potable water would be provided by California Water Service via its entitlements detailed in the Draft SEIR (Section 10.0, *Water Supply*, p. 10-1). In addition, the property has rights to 2.5 acre-feet of reclaimed water which would further offset demand on potable water. ▪ As indicated in the Draft SEIR (Section 10.0, *Water Supply*, pp. 10-11 to 10-12), the project would increase potable water demand by up to 11.4 AFY. The "can and will" service letter provided by California Water Service for the proposed project indicates the applicable water purveyor for the site is able to provide water supply for the proposed project based on its existing facilities. ▪ The project does not involve any extraction or diversion of water but would utilize California Water Service water and recycled water associated with existing entitlements. In addition, the project would utilize water efficiency methods including water efficient fixtures, low-water use landscaping, and principles of low impact development in design to manage stormwater and emulate pre-development hydrologic conditions. ▪ The project would not adversely affect aquifer or basin functions and would not hinder other efforts to renew aquifer or basin functions. ▪ The project would not involve any hauling of water. Therefore, substantial evidence related to proof of a sustainable water supply for the project includes the analysis and references in the Draft SEIR, including Section 10.0, *Water Supply*, the Cal Water will-serve letter include in Draft SEIR Appendix E, the updated will-serve letter attached herein (see Appendix I-2), the previous EIR for the Plan Area, and discussion and analysis in this response to comments/Final SEIR. The project is consistent with Policy PS-3.2.
PS-4.5 New development proposed in the service area of existing wastewater collection, treatment, and disposal facilities shall seek service from those facilities unless it is clearly demonstrated that the connection to the existing facility is not feasible.	Consistent	The California American Water Company has provided a "can and will serve" letter to for the proposed project, confirming the availability of wastewater treatment accommodation.
PS-5.4 The maximum use of solid waste source reduction, reuse, recycling, composting, and environmentally-safe transformation of wastes, consistent with the protection of the public's health and safety, shall be promoted.	Consistent	The proposed project will be served by the Salinas Valley Solid Waste Authority, which includes and promotes a recycling and waste reduction program consistent with state solid waste diversion regulations.

	Consistency	Discussion
PS-8.1 Programs that provide a full range of health care from local and regional health care programs for Monterey County residents, including preventive care, primary care, hospitals, and long-term care services, shall be promoted.	Consistent	The proposed project is a continuum of care residential community designed to provide care to seniors over the age of 55 and to persons with diminishing mental capacity due to Alzheimer's, dementia, or similar causes.
PS-8.2 Programs to promote access to health care and support the establishment of needed health care services in areas with high population concentrations, such as cities, Community Areas, and Rural Centers, shall be supported. Where services do not exist, medical transportation programs to address the unmet transportation needs of residents shall be coordinated with the Transportation Agency of Monterey County.	Consistent	See discussion of Policy PS-8.1 above. Although the proposed project is not located in a city, Community Area, or Rural Center, it is located in the Las Palmas Ranch community, one mile driving distance from SR 68 and 3.5 miles driving distance from south Salinas. Salinas Valley Memorial Hospital is located about 4.75 miles driving distance from the project site.
PS-9.4 The County shall promote meeting the needs of the elderly and establish adult day care facilities or other services that maintain older persons in an independent setting.	Consistent	See the discussion of Policy PS-8.1 and Policy PS-8.2 above.
PS-13.2 All new utility lines shall be placed underground, unless determined not to be feasible by the Director of the Resource Management Agency.	Consistent	A mitigation measure located in Section 5.0, *Aesthetics,* of the Draft SEIR requires all new utility and distribution lines to be placed underground.
Toro Area Plan Supplemental Policy		
Land Use		
T-1.5 Subdivisions shall be designed so that new lots have building sites located outside of the critical viewshed.	Not applicable.	The project is not located with the area designated "critical viewshed." It is located with an area designated "sensitive viewshed." Mitigation measures located in Section 5.0, *Aesthetics,* of the Draft SEIR would reduce the impact of the proposed project on viewsheds.
Circulation		
T-2.1 Employers in surrounding areas should be encouraged to stagger employees' work hours in order to ease peak hour traffic congestion on SR 68 and in other areas.	Consistent	The proposed project is projected to employ about 92 people when operating at maximum capacity. This will include managers and supervisors, trained care givers, chefs and facility maintenance personnel. There will be three shifts: morning, day, and evening. ▪ Morning Shift A (6:00 am to 2:00 pm): 15 employees ▪ Morning Shift B (7:00 am to 3:00 pm): 20 employees ▪ Day Shift A (8:00 am to 4:00 pm): 12 employees ▪ Day Shift B (10:30 am to 6:30 pm): 21 employees ▪ Evening Shift A (3:30 pm to 11:30 pm): 12 employees ▪ Evening Shift B (11:30 pm am to 6:30 am pm): 12 employees As a mitigation proposed by the applicant, shifts will be staggered to minimize peak hour trips on SR 68.

	Consistency	Discussion
T-2.5 Fair-share financial contributions from each new development in the Toro Planning Area shall be required to expedite funding and construction of SR 68 improvements.	Consistent	Funding provided by existing development at Las Palmas Ranch was used for construction of SR 68 improvements, including improving a portion of River Road to four lanes, traffic signals and additional improvements at other River Road intersections. As a condition of project approval for the proposed project, the applicant would be required to pay the Monterey County countywide traffic impact fee and the TAMC regional development impact fee to mitigate for the project's fair share of cumulative traffic impacts throughout the County, which may include additional improvements to SR 68.
T-2.9 If new sites for office, employment, services, and local conveniences are found to be appropriate, such sites should incorporate designs to allow use of alternate modes of transportation.	Consistent	Monterey-Salinas Transit does not serve development along River Road. The applicants propose shuttle services for residents to access areas on the Monterey Peninsula and Salinas, including regular shuttle service for employees to transportation hubs nearby. The nearest MST bus stop is located at Creekside Terrace and Reservation Road, approximate 1.1 miles from the entrance to the project site.
Conservation/Open Space		
T-3.1 Within areas designated as "visually sensitive" on the Toro Scenic Highway Corridors and Visual Sensitivity Map (Figure 16), landscaping or new development may be permitted if the development is located and designed (building design, exterior lighting, and siting) in such a manner that will enhance the scenic value of the area. Architectural design consistent with the rural nature of the Plan area shall be encouraged.	Consistent	The project site is located within an area designated "sensitive viewshed." Section 5.0*, Aesthetics,* of the Draft SEIR included visual simulations from SR 68 and from Reservation Road. The simulations show that although the project would be visible from these locations, the project is not located on steeper slopes and will not constitute ridgeline development. Mitigation measures ensuring the adverse impact is less than significant are: 1) requiring a landscape plan to screen the project site from SR 68, Reservation Road, and River Road, as well as from the adjacent neighborhood and trail; 2) building colors and materials to be earth toned to blend with the existing vicinity landscape; and 3) requiring all new utility and distribution lines on the project site to be underground.
T-3.2 Land use, architectural, and landscaping controls shall be applied, and sensitive site design encouraged, to preserve Toro's visually sensitive areas and scenic entrances: a. River Road/SR 68 intersection b. Laureles Grade scenic vista overlooking the Planning Area	Consistent	See discussion of Policy T-3.1 above. Landscaping for the proposed project includes mostly native plants designed to preserve and enhance the natural landscape of the project site. Non-native plants included in the Landscape Plan are: magnolia tree, source magnolia, Japanese maple, western red bud, European white birch, pheasant tail grass, silver grass, Australian fuchsia, bunny tail grass, and Pacific coast iris.
T-3.4 Placement of existing utility lines underground shall be encouraged, particularly along Laureles Grade Road, Corral de Tierra, San Benancio, River Road, and SR 68.	Consistent	See discussion of General Plan Policy 13.2 above.

	Consistency	Discussion
T-3.5 Exterior/outdoor lighting shall be located, designed, and enforced to minimize light sources and preserve the quality of darkness. Street lighting shall be as unobtrusive as practicable and shall be consistent in intensity throughout the Toro area.	Consistent	Section 5.0, *Aesthetics,* of the Draft SEIR concluded that the proposed project could have an adverse lighting effect. With implementation of Mitigation Measure AES-4, which requires all exterior lighting to be unobtrusive, down-lit, harmonious with the local area, and constructed or located sot that only the intended area is illuminated and off-site glare is fully controlled, lighting impacts would be less than significant and the proposed project would be consistent with this policy.
T-3.7 Removal of healthy, native oak trees in the Toro Planning Area shall be discouraged. An ordinance shall be developed to identify required procedures for removal of these trees. Said ordinance shall take into account fuel modification needed for fire prevention in the vicinity of structures and shall include: a. Permit requirements. b. Replacement criteria c. Exceptions for emergencies and governmental agencies	Consistent	The proposed project does not include removal of oak trees.
Public Services		
T-5.1 To ensure cost-effective and adequate levels of wastewater treatment, the County shall promote relatively higher densities in areas where wastewater treatment facilities can be made available.	Consistent	The proposed project would connect to the Las Palmas Wastewater Treatment Plant, operated by California American Water Company. As presented in the Draft SEIR, there is sufficient capacity to serve the project and the wastewater provider has supplied a "can and will serve" letter for the project.

Property Value

An EIR does not analyze property value impacts, as property value is not considered an environmental impact area under CEQA. The CEQA environmental review process involves evaluation of environmental impacts based on impact areas and thresholds as described in CEQA Appendix G. A local government may consider factors outside of environmental concerns, such as property value, in their overall assessment of a proposed project. However, discussion of property value is outside of the environmental review process and thus is not included in this EIR.

Growth Inducement

Potential growth inducement for the project is analyzed is Section 14.0, *Growth Inducing,* of the Draft SEIR. The proposed project would employ 92 persons for the operations of the proposed assisted living facility, and would not result in a direct population increase because it does not provide dwelling units that will operate or function as independent units. While the proposed project may indirectly result in business and population growth due to the increased local investment from revenues generated by the project, projections of any potential growth would be speculative.

Quality of Life

An EIR does not analyze quality of life impacts, as quality of life is not considered an environmental impact area under CEQA. The EIR does, however, analyze environmental factors that may be related to quality of life, including aesthetics, air quality, noise, transportation, and safety. The EIR analyzes these impact areas individually.

Impacts to aesthetics include introduction of light and glare and alterations to scenic vistas and visual character. These impacts would be reduced to less than significant with the implementation of mitigation measures listed in Section 5.0, *Aesthetics*. Mitigation measures would include the preparation of a landscape plan and a lighting plan, design review of the project, and undergrounding of all utility and distribution lines.

Air pollutant emissions would be generated by construction activities, which is a short-term impact and would be mitigated to less than significant through dust control measures, an approved grading plan, and the proper maintenance of construction equipment to reduce emissions. Air pollutant impacts and mitigation measures are discussed in Section 6.0, *Air Quality*.

Odor is also discussed in Section 6.0, *Air Quality,* of the Draft SEIR. As stated therein, the proposed project would not cause significant impacts related to objectionable odors. While meal preparation may cause an odor, this would occur primarily indoors. Due to the location of the project uphill from the residential development, odors released outdoors from meal preparation would be intermittent and unlikely to be objectionable to the extent of causing a public nuisance. The configuration of the Las Palmas 1 subdivision's development would not significantly obstruct the efficient passage of odors to the extent that a significant odor impact would occur.

Impacts to transportation and traffic include increased vehicle trips on SR 68, increased traffic at intersections. To reduce overall trip generation to and from the project site, the applicant shall prepare a detailed plan for shuttle service to areas on the Monterey Peninsula and in Salinas from the project site. The project would also schedule shift changes outside of morning and evening peak traffic hours to offset traffic generated by employees.

Public Services Availability

The Draft SEIR analyzes public services in Section 11.0, *Effects Not Found to be Significant*. In reviewing the project's suitability for the project site, the County determined that services that will be needed by residents of the proposed project are sufficient and located adequately. An EIR, however, analyzes the potential impacts of the project on the environment but does not analyze the impacts of the environment on the project; therefore the impacts that the existing site conditions would have on potential senior living center residents is not analyzed, as such analysis is outside of the scope of environmental review under CEQA. The project is expected to have less than significant impacts on public services such as police, fire, library, and medical services due to the nature of the project, the existing services available within a serviceable distance, and taxes, impact fees, and payment for use of the Las Palmas residential development private security services. The proposed project would provide on-site medical care, and additional higher-level medical services are available at the Salinas Valley Memorial Hospital approximately four miles northeast of the project site. The project would not require additional staffing or facilities to be required for police, fire, hospital, library, or other similar services, and therefore the impact is less than significant.

Topical Response D: Transportation/Traffic

Comments regarding traffic impacts of the proposed project were received from Christine Kemp of Noland, Hamerly, Etienne, & Hoss Attorneys at Law; Chris D. Kinzel of TJKM Transportation Consultants; Mike Weaver of the Highway 68 Coalition; and numerous neighboring residents. Of primary concern is the potential for congestion at the primary Las Palmas 1 subdivision entrance, which commenters identify as a safety risk if vehicles were to queue on River Road while waiting to turn right onto Las Palmas Road. Reliance on the Las Palmas Road entrance/exit is also discussed at great length by commenters regarding the topic of emergency evacuation; comments state that in the event of a disaster that necessitates evacuation of the subdivision, existing residents and senior assisted living community residents would need to funnel out of this single exit. Commenters state that the project should have its own separate entrance, rather than rely on the subdivision entrance and streets.

Commenters also voice concerns about traffic and congestion impacts to the following roadways: streets within the subdivision, which are maintained by HOA funds, and could be damaged by project-generated traffic, especially during project construction; River Run Road and Woodridge Court, which pedestrians and children cross to access Corey Park, raising traffic-safety concerns; State Route 68 (SR 68), which commenters state is operating at level of service (LOS) F, and therefore should not be subjected to any additional congestion.

Traffic Conditions on Residential Streets

The project would increase traffic on three subdivision streets: Las Palmas Road, River Run Road, and Woodridge Court. The Riverview at Las Palmas Senior Housing Traffic Impact Analysis (Keith Higgins 2017) estimates the project's effect on traffic volumes in the Subdivision. Table 9-1 on page 9-22 of the Draft SEIR estimates existing plus project-generated traffic, based on the traffic study, on Las Palmas Road, River Run Road, and Woodridge Court. As shown in Table 9-1, with the addition of trips generated by the project, these streets would all operate well within acceptable traffic volumes for residential streets (LOS A or B), based on generally accepted level of service and traffic calming thresholds. Furthermore, the project would add little to no vehicle trips to other streets in

the subdivision. The project would have a less than significant impact on traffic conditions in the subdivision, and no mitigation would be required.

Queuing at Entry Gate

In addition to increasing traffic volumes on residential streets in the subdivision, vehicle trips generated by the project would affect queuing at the entry gate to the subdivision on Las Palmas Road. The discussion of neighborhood traffic impacts on page 9-22 of the Draft SEIR has been amended as follows to address the project's effect on traffic conditions at the gate:

> Inbound vehicle trips to the project site would increase the volume of traffic that passes through the entry gate to the subdivision. This gate is currently served by a security guard. Subdivision residents have windshield tags on their vehicles, which allow entrance without having to stop at the security gate (Higgins 2019). Visitors and commercial vehicles are required to stop and be recorded in the daily log. While this information is recorded, all entering vehicles must stop because there is only a single entrance lane. The gate is not served by a security guard during the afternoon rush hour, which has the highest inbound traffic flow during the day, for the sake of avoiding occasional queues that would extend from the gate house to River Road.
>
> Based on the traffic study prepared for the project, vehicle trips generated by the project would increase the existing volume of inbound traffic at the gate by an estimated 16 percent (Higgins 2017, 2019). Las Palmas Road has enough capacity to accommodate these additional trips without resulting in substantial queuing in front of the gate, or in blockage of vehicles turning into or out from Winding Creek Road. As a condition of approval of the project, the County would require employees at the senior assisted living community to display windshield tags. This condition of approval would eliminate the need to check each employee's vehicle, reducing the length of queues at the gate. Further measures, such as installing an automatic gate or adding a second inbound lane at the gate, would not be necessary to reduce queuing. Therefore, the project would have a less than significant impact on traffic circulation related to queuing at the subdivision's gate.

Deterioration of Residential Streets

Additional traffic on residential streets in the subdivision during construction and operation of the project would contribute to physical deterioration of these streets. Page 9-24 of the Draft SEIR has been amended as follows to discuss the potential for vehicle trips generated by the project to deteriorate residential streets in the subdivision:

> During construction of the project, truck trips routed through the subdivision could contribute to deterioration of private residential streets maintained through homeowners' association fees. However, as a standard grading and building permit condition, the County would require that the project applicant be responsible for repairing any damage to existing infrastructure during the temporary construction activities. This would include repairing pavements and special pavement surface treatments, as needed. Adherence to this condition of approval would prevent long-term deterioration of the circulation system from construction activity.
>
> During operation of the project, the addition of vehicle trips, especially truck trips to serve the senior assisted living community, could incrementally contribute to deterioration of subdivision streets. To offset this effect, payment of a fair-share contribution toward ongoing maintenance of private streets would be necessary. As a condition of approval, the County would require that

the applicant pay a fair-share contribution toward ongoing maintenance of private streets maintained by the homeowners' association in the subdivision. The fair-share contribution would be proportionate to the effect of project-generated vehicle trips on deterioration of privately maintained streets, relative to the effect of other residential traffic in the subdivision.

With implementation of this condition, the applicant would make a fair-share contribution to repairing long-term damage to privately maintained streets in the subdivision. Therefore, the project would have a less than significant impact related to deterioration of the circulation system.

SR 68 Traffic Conditions

The project would contribute to existing traffic congestion on SR 68. As discussed on page 9-25 of the Draft SEIR, it is estimated that the project would add one AM peak hour trip and four PM peak hour trips to the two-lane section of SR 68 immediately west of the Toro Park interchange. Although the increase in traffic volumes would be minimal, it would contribute to existing unacceptable traffic conditions on the highway. Therefore, page 9-24 of the Draft SEIR acknowledges that the project would have a significant and unavoidable impact on traffic conditions on SR 68. However, the project would result in LOS C traffic conditions at the intersections of SR 68 ramps with Reservation Road and River Road, which would be acceptable. Payment of the applicable Monterey County and TAMC development impact fees also would mitigate the project's contribution to cumulative impacts. Refer to pages 13-6 and 13-7 of the Draft SEIR for further discussion.

Separate Entry

According to the project applicant (Ellis 2019), a separate entry for the project was considered. However, a separate entry would require an easement on privately owned land, which the applicant was not able to obtain. Because the applicant has not obtained such an easement, a separate entry is not anticipated for the project. A separate access would not be necessary to avoid impacts on traffic circulation because the level of service on roads providing access to the project site would be acceptable (Higgins 2017). As discussed below, a separate access also would not be necessary to ensure adequate emergency access.

Moreover, a separate entry would result in additional construction impacts. Also, there would likely be site distant issues on River Road as a separate entry intersection into the project site would be very close to the entry for the Las Palmas subdivision. Additionally, a separate entry would likely be located on or very near a curve on River Rd, which would increase the potential for traffic incidents/accidents.

Emergency Access

The primary emergency access route to and from the project site would be Woodridge Court. Page 9-24 of the Draft SEIR has been amended as follows to discuss impacts associated with the steepness this access route and the adequacy of secondary emergency access to the project site:

Emergency Access

~~The project's traffic impact assessment concluded that vehicle trip generation associated with the proposed project would be accommodated by the existing neighborhood roadway system. Therefore, implementation of the proposed project would not result in inadequate emergency access to the project site itself, or to residences in the Las Palmas Ranch neighborhood.~~

The project would involve extending Woodridge Court at a grade of approximately 15 percent to provide primary vehicular access to the project site. This grade is within the County's requirements for the Las Palmas Specific Plan and for the County in general. Therefore, the grade of site access would not create a safety hazard for emergency vehicle responding to service requests at the senior assisted living community.

Secondary access between River Road and the project site during emergency evacuations would be available through the lawn area between County Park Road and Woodridge Court. In addition, the project's interior loop street system would facilitate emergency access in more than one direction on-site. However, secondary access would not be provided on Woodridge Court between Country Park Road and the first internal parking lot aisle. To provide for additional capacity on this road segment in an emergency evacuation, turnouts on exiting and entering lanes should be provided. In addition, an all-weather surface should be provided on the lawn area between Country Park Road and Woodridge Court to facilitate emergency access. Therefore, this impact would be potentially significant without mitigation.

Mitigation Measure TRA-3 Emergency Access Improvements. Prior to occupancy of the proposed senior assisted living community, the applicant shall install eight-foot turnouts on the entering and existing lanes of the proposed extension of Woodridge Court between Country Park Road and the first internal parking lot aisle on the project site. Also prior to occupancy, the applicant shall install grass grid pavers on the section of lawn area between Woodridge Court and Country Park Road to provide an all-weather surface for secondary access.

Implementation of Mitigation Measure TRA-3 would involve ground disturbance to install turnouts and grass grid pavers, which could have secondary effects on unanticipated subsurface cultural resources and water quality. However, as discussed on page 11-1 of the Draft SEIR, the applicant would apply comprehensive measures in the 2010 Monterey County General Plan to avoid and minimize impacts on archaeological resources and human remains. As discussed on page 11-6 of the Draft SEIR, compliance with stormwater permitting requirements would prevent erosion or degradation of water quality from construction activities. Therefore, the secondary environmental impacts of Mitigation Measure TRA-3 would be less than significant.

With implementation of Mitigation Measure TRA-3, the applicant would improve the capacity for and safety of emergency access routes to the project site. As a result, the proposed project would not cause inadequate emergency access to the project site itself, or to residences in the Las Palmas Ranch neighborhood. This impact would be less than significant with mitigation.

Traffic Safety

The project would generate traffic in proximity to pedestrians and bicyclists on residential streets in the subdivision. Additional traffic on Woodridge Court and River Run Road would occur on routes providing access to Corey Park. With project-generated traffic, Woodridge Court would carry about 363 vehicles per day between River Run Road and the project site, and River Run Road would carry about 1,313 vehicles per day between Woodridge Court and Las Palmas Road (Higgins 2017). Traffic volumes on these streets and others in the subdivision would be well within acceptable levels for local residential streets, with traffic delay not exceeding the applicable standard of LOS C. Although traffic accidents have occurred at the subdivision's entrance, the volume of inbound traffic would not increase by more than 16 percent and project-generated traffic would not result in substantial

queuing at the entry gate. (Refer to *Queuing at Entry Gate* above for further discussion of traffic effects at the gate.) Therefore, additional traffic near Corey Park and other parts of the subdivision would not substantially increase safety hazards for pedestrians, bicyclists, and motorists in the subdivision, including people accessing Corey Park. The project would have a less than significant impact on traffic safety.

Vehicle Miles Traveled

As noted by commenters, Draft SEIR Section 9.0, *Transportation & Traffic*, does not include an analysis of the project's effect on vehicle miles traveled (VMT) in Monterey County. VMT is the measure of miles traveled within a specific geographic area for a given period. This metric can be used to quantify the impact of a project or plan on the larger transportation system. In December 2018, the California Governor's Office of Planning and Research in the *Final Adopted Text Revisions to the CEQA Guidelines* introduced VMT as the primary metric to quantify a project's impact in place of level of service. However, local jurisdictions were given a grace period to adopt VMT (by July 2020). Monterey County has yet to adopt VMT as its primary metric for evaluating traffic impacts. Therefore, the Draft SEIR is not required to analyze the project's effect on VMT.

Topical Response E: Slope Stability and Stormwater Drainage

Multiple comments state that the project site is vulnerable to erosion, soil instability, and landslides/mudslides. Concerns are voiced that because the project site is elevated, the project could destabilize the slope. Commenters note that prior storm events have indicated geologic instability around the project site. Furthermore, commenters state that stormwater runoff from the proposed structures would pose a flood hazard to the subdivision homes, which are at a lower elevation.

Slope Stability

A Geologic Hazards Report and Soil Engineering Feasibility Investigation was prepared for the project (Landset Geotechnical Report, Appendix F to the Draft SEIR). The preliminary report determined that the project is feasible with a recommendation that an additional design level soil engineering investigation be performed once preliminary development plans have been completed. Section 11.0, *Effects Not Found to be Significant*, of the Draft SEIR summarizes the preliminary geotechnical report by stating that while the steep slopes on the north and south flanks of the site are prone to landslides and slope failure, future building foundations would be located within the geologically suitable building envelope as described in the report, which would avoid environmental impacts related to landslides. For these reasons, the project would not be subject to, nor increase, any on- or off-site slope stability hazards that would create a significant environmental impact.

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.

The following revisions have been made to Section 11.4, *Geology & Soils,* of the Draft SEIR to provide additional clarification:

> 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. Building within this area would be adequate to reduce the impact because, as determined by Landset Engineering, Inc., the area within the geologically suitable building envelope is less steep than the steep slopes on the north and south flanks of the site, and more geologically stable. As displayed in Figure 11-1, Project Site Slopes, a portion of the project site proposed for development is located in an area of slopes greater than 25%.

As a condition of approval, all recommendations included in the geotechnical report would be implemented in the design and construction of the project. These recommendations include, but are not limited to: building within the geologically suitable building envelope to ensure that future building foundations are built on the most stable part of the site that would expose neither those nor other structures to harm from landsliding and slope instability; having the project geologist review final site grading and improvement plans prior to construction and site grading during earthwork to properly account for and, if necessary, adjust to actual conditions found during grading; requiring that on-site soils are inspected by a soil engineer prior to any site clearing or grading to ensure the internal consistency and stability of on-site soils; measures to ensure stability of existing on-site soils during and after site preparation and grading; and measures to ensure stability of foundations, footings, pile and grade beam foundations, retaining walls, and utility trenches.

In addition, the applicant would be required to comply with applicable building codes and standard County conditions of approval relating to slope stability and stormwater drainage. For example, the applicant would be required to comply with Monterey County Code Chapter 16.08, Grading, which prohibits the issuance of grading permits for projects that would be hazardous by reason of flood, geological hazard, seismic hazard, or unstable soil; and Monterey County Ordinance Code, specifically Chapter 16.12, which requires an erosion control plan prior to permit issuance for building, grading, or land clearing.

Compliance with recommendations in the geotechnical report, which would be required as a condition of project approval, and compliance with applicable County code requirement would ~~to~~ ensure that there would be no significant impacts associated with geologic hazards.

For informational purposes, a full listing of the recommendations of the geotechnical report follows (recommendations relating to site drainage are listed below under *Stormwater Runoff*):

Geologic Recommendations

The following recommendations of the geotechnical report would address potential effects related to landsliding, slope instability, and seismic hazards by requiring that the final site grading and improvement plans are reviewed for such effects; that the project geologist review site grading during earthwork to ensure site stability and to properly account for and, if necessary, adjust to actual conditions found during grading; that future building foundations are built on the most stable part of the site that would expose neither those nor other structures to harm from landsliding and slope instability; and that structures designed for human occupancy are built according to the CBC, including provisions related to seismic shaking.

1. Prior to construction, the project geologist should review the site grading and improvement plans and their potential impacts on identified geologic hazards.
2. In order to mitigate the potential hazards from landsliding and slope instability, future building foundations should be located within the Geologically Suitable Building Envelope (Sheet 1). Structures designed for human occupancy should be located within this envelope.

3. Structures designed for human occupancy shall be designed according to the current edition of the CBC. Structures should be designed for peak horizontal ground acceleration of 0.522g.
4. The project geologist should review the site grading during earthwork. The purpose of this review is to examine the site for overall stability and to provide additional recommendations if site conditions differ those identified during the course of this investigation.

Soil Engineering

Site Preparation and Grading

The following recommendations of the geotechnical report would address potential effects related to soil stability by requiring that on-site soils are inspected by a soil engineer prior to any site clearing or grading to ensure the internal consistency and stability of on-site soils.

1. The soil engineer should be notified at least ten (10) working days prior to any site clearing or grading so that the work in the field can be coordinated with the grading contractor, and arrangements for testing and observation services can be made. The recommendations contained in this report are based on the assumption that Landset Engineers, Inc. will perform the required testing and observation services during grading and construction. It is the owner's responsibility to make the necessary arrangements for these required services.
2. Prior to grading, construction areas should be cleared of obstructions, buried structures & utilities, tree roots, undocumented fill and other deleterious materials. Site clearing should be observed by a field representative of Landset Engineers, Inc. Voids created by removal of material as described above should be called to the attention of the soil engineer. No fill should be placed unless a representative of this firm has observed the underlying soil.
3. Following site clearing, the upper 1.5 to 3-feet of native soil should be overexcavated from the building areas. The actual depth of subexcavation should be determined by additional design level soil engineering investigation(s). Building areas are defined as the soils within and extending a minimum of 5 feet beyond the foundation perimeters and structural fill areas.
4. The soils exposed by overexcavation should be scarified 12 inches; moisture conditioned to above optimum moisture content, and compacted to at least 90% of maximum dry density. Where referenced in this report, percent relative compaction and optimum moisture content shall be based on ASTM test D1557. Areas to receive structural fill outside the building pad should be scarified and recompacted in a similar manner.
5. In order to limit the potential for differential settlement of conventional footings, foundations should not be supported on both fill and cut. Therefore, we recommend that the cut side of the building area should be overexcavated (undercut). The proposed grading within the building area should be designed so that no more than 5 feet of differential fill thickness exists below foundations. The portion of the building foundations bearing on cut should be undercut at least 3 feet below the proposed building pad so that the entire foundation is bearing on a uniform layer of compacted fill. Deeper overexcavation may be necessary in order to satisfy the differential fill thickness recommendations.
6. If structural fill is to be placed on slopes steeper than 6:1 (horizontal to vertical), keyways should be established at the toe of the proposed fill slopes. The keyways should have minimum widths of 12-feet and should be sloped approximately 2% back into the hillsides. The keyways and subsequent upslope benches should penetrate into sufficiently stable material as determined by the soil engineer at the time of grading.
7. If structural fill is to be placed on slopes steeper than 10:1, the slopes should be benched. The benches should have a minimum width of 12-feet and should be sloped approximately 2% back into the hillsides. The soil engineer will determine the depth, scarification, and recompaction of the bench bottoms at the time of grading.
8. If fill over cut slopes are to be constructed, keyways should be established at the cut/fill daylight lines. The keyways should have minimum widths of 12-feet and should be sloped

approximately 2% back into the hillsides. The keyways and subsequent upslope benches should penetrate into sufficiently stable material as determined by the soil engineer at the time of grading.

9. The soil engineer should also observe keyways and benches to assess the need for subsurface drains (subdrains). Subdrains in other areas may also be recommended depending on the grading plan and site conditions observed at the time of grading.
10. Fill slopes should be constructed at a maximum finished slope inclination of 2:1 (horizontal to vertical). Fill slopes should be overfilled and trimmed back to competent material. Further compaction of exposed fill slope faces using sheepsfoot rollers or tracked equipment may be recommended by the soil engineer. Cut slopes should be constructed at an inclination of 2:l.
11. Fill, material should be placed in thin lifts, moisture conditioned to a level above optimum moisture content, and compacted to a minimum of 90 percent of maximum dry density. Prior to compaction, the soil should be cleaned of any rock, debris, and irreducible material larger than 3-inches in diameter.
12. Fill material should consist of non-expansive Select Structural Fill. Select Structural Fill is defined herein as a native or import fill material which, when properly compacted, will support foundations, pavements, and other fills without detrimental settlement or expansion. Select Structural Fill is specified as follows:
    - Clean native soil may be utilized, but import fill shall have a Plasticity Index of less than 12
    - Be free of debris, vegetation, and other deleterious material
    - Have a maximum particle size of 3-inches in diameter
    - Contain no more than 15% by weight of rocks larger than 21/2-inches in diameter
    - Have sufficient binder to allow foundation and unshored excavation stand without caving
    - Prior to delivery to the site, a representative sample of proposed import should be provided to Landset Engineers, Inc. for laboratory evaluation
13. In areas to be paved, the upper 12-inches of subgrade soils and all aggregate base should be compacted to a minimum of 95 percent of maximum dry density. Aggregate base and subgrade should be firm and unyielding when proof rolled by heavy rubber-tired equipment prior to paving.

Foundations

The following recommendation of the geotechnical report would address potential effects related to future building stability by ensuring that building foundations are properly supported; placed on properly prepared, stable soils; and engineered to withstand reasonably foreseeable future conditions as determined by the geotechnical engineer.

14. Structures may be supported by conventional continuous and spread (pad) footings or drilled pier & grade beam foundations.

Conventional Footings

15. Conventional footings may be supported ***entirely on recompacted engineered fill or entirely on firm native soil, but not a combination of both***. Footings should have minimum depths of 12-inches below lowest adjacent grade for single story structures, and 18-inches below lowest adjacent grade for two story structures, and 24-inches below lowest adjacent grade for three story structures. For the above conditions, the footings for a proposed structure may be designed for an allowable bearing pressure range of 1,000 to 3,000 psf for dead plus live loads. Footings should be reinforced as directed by the architect/structural engineer.
16. Footing excavations should be observed by a representative of this firm prior to placement of formwork or reinforcement. Concrete should be placed only in foundation excavations that have been kept moist, and contain no loose or soft soil debris.
17. Footings located adjacent to other footings or utility trenches should have their bearing surfaces founded below an imaginary 1:1 (horizontal to vertical) plane projected upward from the bottom edge of the adjacent footings or utility trenches.

Pier & Grade Beam Foundations

18. Drilled friction and/or end bearing pier and grade beam foundations should penetrate through any engineered fill and/or topsoil and bear entirely into the dense native earth materials as verified by a representative of this firm at the time of drilling.
19. Foundation piers should be 12 to 24-inches in diameter and should be spaced apart at least 3 pier diameters, center to center. These cast-in-place concrete piers should be reinforced as directed by the project architect/structural engineer.
20. For the above conditions, the piers for a proposed structure may be designed for an allowable skin-friction range of 200 to 350 psf. for pier lengths in native earth materials for dead plus live loading. This value may be increased by one-third when considering temporary additional short-term wind or seismic loading. The support from end bearing of the piers should be neglected. Due to possible disturbance during drilling, skin friction on the upper 2-feet of the piers should be discounted in the calculations. Piers should be structurally connected to grade beams designed to transfer imposed loads to the foundation piers.
21. For calculating resistance to lateral loading, a passive resistance equal to an equivalent fluid weight range of 200 to 350 pcf. can be used (ultimate value). For pier foundations, this lateral resistance can be used over two times the cross sectional area of the pier. Only competent native earth material and engineered structural fill may be utilized in calculating lateral passive resistance. Additionally, the upper 2-feet of the pier should be ignored in providing lateral passive resistance.
22. Perimeter foundation piers and piers adjacent to structural concrete slabs-on-grade should be laterally restrained by concrete grade beams penetrating a minimum of 12-inches below lowest adjacent grade. Grade beams between interior piers are not considered necessary. Grade beams should be reinforced as directed by the project architect/structural engineer.

Slabs-on-Grade and Exterior Flatwork

23. For buildings utilizing conventional footings, interior slabs-on-grade should have a thickness of 4 to 6-inches. It should be noted that the project structural engineer might require thicker slab sections to provide the necessary support for the anticipated structural loads. Conventional concrete slabs-on-grade should be reinforced with steel as specified by the structural engineer.
24. To minimize floor dampness, such as where moisture sensitive floorings will be present, a section of capillary break material at least 4-inches thick covered with a membrane vapor barrier should be placed between the floor slab and the compacted soil subgrade. The capillary break should consist of a clean, free draining material such as Vi to 14-inch drain rock with not more than 10 percent of the material passing a No. 4 sieve. The drain rock should be free of sharp edges that might damage the membrane vapor barrier. The membrane vapor barrier should be a minimum 10 mil in thickness, and care should be taken to properly lap and seal the vapor barrier, particularly around utilities. The sand cushion should be lightly moistened immediately prior to concrete placement.
25. Exterior concrete flatwork such as driveways, patios and sidewalks should be designed to act independently of building foundations. Exterior flatwork should be constructed on compacted soil subgrade moisture conditioned to over optimum moisture content. Reinforcement and joint spacing should be at the direction of the architect/structural engineer.

Retaining Walls

The following recommendation of the geotechnical report would address potential effects related to future soil and slope stability by ensuring that retaining walls are engineered and built to withstand expected soil pressures and seismic forces; placed on soils that are properly prepared, well drained, and engineered to withstand reasonably foreseeable future conditions as determined by the geotechnical engineer.

26. Retaining walls for the site may be designed using the following general design parameters, which assume fully drained wall backfill conditions. The average bulk density of material placed on the backfill sides of walls considers a design range of 120 to 130 pounds per cubic foot (pcf).
27. The vertical plane extending down from the ground surface to the bottom of the heel of the vertical wall will be subject to lateral soil pressures (plus surcharge loads). An Active Soil Pressure of 35 to 50pcf (equivalent fluid weight) should be used in design of site walls that are free to move laterally and resultant settlement of backfill is tolerable. An At-Rest Soil Pressure of 50 to 70pcf should be used in design for walls, which are restricted from movement at the top (such as foundation walls). The above pressures are applicable to a horizontal retained surface behind the wall. Walls having a retained surface that slopes upward from the wall should be designed for an additional equivalent fluid pressure of 1 pcf for the active case and 1.5 pcf for the at rest case, for every two degrees of slope inclination.
28. The additional effects of earthquakes on the walls may be simulated by applying a horizontal line force of 10H2 pounds per foot length of wall. This force should be applied at a height of 0.6H above the wall heel. The additional effects of vertical live loads on the backfill side of walls may be simulated by applying 50 percent of the live loads as a horizontal surcharge force on the walls. The point of application of the live load surcharge

may be estimated by assuming a 45-degree line of action down from the live load to the design plane or wall stem.

29. Retaining walls should be supported on foundations bearing uniform soil conditions as described in the preceding foundation section of this report. The range for ultimate coefficient of friction below the base of the wall = 0.25 to 0.35. Passive soil resistance against the portion of the wall base and key is estimated to range from 200 to 350psf/ft. for level ground in front of the wall. Lateral support from the soil that may be excavated or used in landscaping near the wall footing should be neglected. Typically this would include the top 12-inches of soil around the wall.
30. The earth pressures are based on fully drained conditions. We recommend that a zone of drainage material at least 12-inches wide should be placed on the backfill side of the walls. Drainage materials should consist of Class 2 permeable material complying with Section 68 of the Caltrans Standard Specifications, latest edition, or 14-inch permeable drain rock wrapped in Mirafi HON or equivalent. Manufactured drains such as Miradrain or Enkadrain are acceptable alternatives to the use of permeable or gravel material, provided that they are installed in accordance with the recommendations of the manufacturer. The drains should extend from the base of the walls to within 12-inches of the top of the wall backfill. The upper 12-inches of wall backfill should consist of compacted structural fill. A perforated pipe should be placed (holes down) about 4-inches above the bottom of the wall or below lowest adjacent grades in front of the wall. The perforations should be no larger than !4-inch diameter, and the perforated pipe should be connected via a solid collector pipe to an approved point appropriate discharge facility.
31. Wall backfill should be moisture conditioned and compacted to a minimum of 90% of maximum dry density. If heavy compaction equipment will be used for compaction of the wall backfill, the wall design should include a compaction surcharge in addition to the soil pressures given above. Landset Engineers, Inc. should be consulted for proper compaction surcharge pressures. To avoid surcharging the walls, backfill within 3-feet of the wall should be compacted by hand operated equipment.

Utility Trenches

The following recommendation of the geotechnical report would address potential soil stability effects from installation of utility trenches on the project site by ensuring that these trenches would not slough or cave during construction; and that soils used to fill these trenches would be stable after installation of utility lines.

32. On-site soils should be properly shored and braced during construction to prevent sloughing and caving of trench sidewalls. The contractor should comply with the Cal/OSHA and local safety requirements and codes dealing with excavations and trenches.
33. A select non-corrosive, granular, material should be used as bedding and shading immediately around underground utility pipes and conduits. Native soils may be used for trench backfill above the select material.
34. Trench backfill in landscaped or unimproved areas should be compacted to a minimum of 85 percent of maximum dry density. Trench backfill beneath asphalt and concrete pavements should be compacted to a minimum of 95 percent of maximum dry density. Trench backfill in other areas should be compacted to a minimum of 90 percent of maximum dry density.

35. The bottoms of utility trenches that are parallel to foundations should not extend below an imaginary plane sloping downward at a 1:1 (horizontal to vertical) angle from the bottom outside edges of foundations.

Stormwater Runoff

As stated at the beginning of this topical response, some commenters state that stormwater runoff from the proposed structures would pose a flood hazard to the subdivision homes or other off-site facilities such as roadways, which are at a lower elevation. Some assert that the project is not permitted to connect with and utilize the subdivision's stormwater drainage system because the applicants are not members of the HOA.

As further explained in Topical Response I, the project applicants, who own the site, are currently members of the Las Palmas Ranch Home Owners Association and have paid dues to the association. Several commenters acknowledge that the applicant makes payments to the HOA but contend that those payments do not represent membership status. Regardless of the applicants' membership status, it would be physically possible to connect the project's drainage system to the subdivision's drainage system. Stormwater runoff and off-site flood hazards are further discussed below.

A Conceptual Stormwater Control Plan (Gateway Engineering 2017; refer to Appendix I-1) was developed for the project as part of the preliminary design to address stormwater management for the project site in conformance with County and State regulatory requirements. The plan illustrates the location of impervious and pervious areas, storm flow direction and storm water control facilities.

The project would introduce new impervious surfaces in the form of building rooftops, and paved drives, parking areas and walkways. A large proportion of the site would remain impervious and feature landscaping to promote groundwater infiltration and uptake. The project site would also feature three bioretention areas where stormwater would be captured and filtered prior to infiltration or metered release to a connecting storm drain. Grading and contouring on the project site would collect and direct flows into one of these three basins. The site drainage is specifically designed to meet County and regulatory requirements, and emulate pre-development conditions, resulting in the water volume, rate and quality of stormwater leaving the site being similar to current conditions. As a result, there would be no project-related downstream or off-site impacts related to flood hazards or stormwater quality related to project operation.

The following revisions have been made to page 11-6 in Section 11.6, *Surface Hydrology,* of the Draft SEIR to provide additional clarification:

> 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. A Conceptual Stormwater Control Plan was developed for the project as part of the preliminary design to address stormwater management for the project site in conformance with County and State regulatory requirements. The plan illustrates the location of impervious and pervious areas, storm flow direction and storm water control facilities.
>
> The project would introduce new impervious surfaces in the form of building rooftops, and paved drives, parking areas and walkways. A large proportion of the site would remain impervious and feature landscaping to promote groundwater infiltration and uptake. The project site would also feature three bioretention areas where stormwater would be captured

and filtered prior to infiltration or metered release to a connecting storm drain. Grading and contouring on the project site would collect and direct flows into one of these three basins.

~~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 site drainage is specifically designed to meet County and regulatory requirements, and emulate pre-development conditions, resulting in the water volume, rate and quality of stormwater leaving the site being similar to current conditions.

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. As a result, there would be no project-related downstream or off-site impacts related to flood hazards or stormwater quality related to project operation.

As explained in Section 11.6 of the Draft SEIR, as amended above, proposed development is required to 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 stormwater flow. The stormwater control plan includes on-site storm water control measures designed to achieve zero net increase in the rate of stormwater discharge relative to pre-project conditions. This would reduce the potential for runoff from new development to exceed the capacity of storm drainage facilities and contribute to off-site flood hazards. The project would therefore not substantially contribute to flood hazards in the subdivision or associated facilities such as the entrance road to the subdivision, or any other off-site use. Additionally, a County-reviewed stormwater 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.

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 stormwater runoff. The recommendations of the geotechnical report relating to site drainage are the following:

Site Drainage

The following recommendations of the geotechnical report would address potential effects related to site drainage by ensuring that a comprehensive drainage and erosion control plan designed by a Registered Civil Engineer is prepared for the project; surface drainage does not pond adjacent to foundations; surface drainage or roots do not spread beneath foundations; and that surface runoff and flow be directed to an approved point of discharge in a non-erosive manner.

36. The site soils are highly erodible and a drainage & erosion control plan is essential to the project. Fluctuations of moisture contents are a major consideration, both before and after construction. Site runoff will be increased due to the new paved and roofed surfaced areas.

A comprehensive drainage & erosion control plan designed by a Registered Civil Engineer is essential to the long-term sustainability of the project.

37. Surface drainage should provide for positive drainage so that runoff is not permitted to pond adjacent to foundations, concrete slabs-on-grade, and pavements. Pervious ground surfaces should be finish graded to direct surface runoff away from site improvements at a minimum 5 percent grade for a minimum distance of 10-feet. If this is not practicable due to the terrain or other site features, swales with improved surfaces should be provided to divert drainage away from improvements. Surface runoff collected in this swale should be controlled and flow in a non-erosive manner to an approved point of discharge.
38. Roof gutters should be utilized around the building eaves. Roof gutters should be connected to downspouts, which in turn should be connected to pipes leading to the site storm drain system. Runoff from downspouts, planter drains and other improvements should discharge in a non-erosive manner away from site improvements in accordance with the requirements of the governing agencies.
39. The migration of water or spread of root systems below foundations, slabs, or pavements may cause differential movement and subsequent damage. Landscaping runoff collection facilities should be incorporated in the project design.
40. Cut-off drainage swales should be constructed at the top of all cut and fill slopes. These drainage swales should be of adequate size to collect surface runoff and flow to an approved point of discharge in a non-erosive manner. Proper drainage and re-vegetation of graded slopes is essential to ensure stability.

In addition to complying with the recommendations of the geotechnical report, the applicant would be required to comply with applicable building codes and standard County conditions of approval relating to slope stability and stormwater drainage. For example, the applicant would be required to comply with Monterey County Code Chapter 16.08, Grading, which prohibits the issuance of grading permits for projects that would be hazardous by reason of flood, geological hazard, seismic hazard, or unstable soil; and Monterey County Ordinance Code, specifically Chapter 16.12, which requires an erosion control plan prior to permit issuance for building, grading, or land clearing. Erosion control plans must comply with Chapter 16.12.070, Runoff Control, and Chapter 16.12.090, which prohibits land clearing or grading between October 15 and April 15. Chapter 16.12.070 requires the following:

- On highly permeable soils, excess runoff must be retained on site through the use of infiltration basins, percolation pits or trenches, or other suitable means.
- On projects where onsite percolation is not feasible, all runoff must be detained or dispersed over non-erodible vegetated surfaces.
- Concentrated runoff which cannot be effectively detained or dispersed without causing erosion shall be carried in non-erodible channels or conduits to the nearest drainage course designated for such purpose or to onsite percolation devices.
- Runoff from disturbed areas shall be detained or filtered by berms vegetated filter strips, catch basins, or other means as necessary to prevent the escape of sediment from the disturbed area.
- No earth or organic material shall be deposited or placed where it may be directly carried into a body of water.

Topical Response F: Visual Impacts

Numerous comments were received addressing the visual and aesthetic aspects of the proposed project. Commenters assert that the project would impact scenic views, noting local protections for scenic resources, including the scenic highway designation of SR 68. Commenters also state that the project would degrade private views from within the subdivision, including due to tree removal and night sky light pollution, and would reduce privacy within the subdivision because homes would be visible from the project site. Additionally, commenters state that the project would be ridgeline development, which is prohibited by County regulations. Some commenters discuss the Draft SEIR's mitigation measures for aesthetic impacts, describing the proposed visual screening of the project site as inadequate.

Scenic Resources

SR 68 is a designated scenic highway of the state's Scenic Highway Program from SR 1 in Monterey to the Salinas River. SR 68 provides views of open space, agricultural land, and the Santa Lucia Mountains that border the Salinas Valley. Additionally, the Toro Area Plan designates the River Road/SR 68 intersection as a scenic entrance (Policy T-3.2), designates the land surrounding River Road in the vicinity of the project site as visually sensitive (Policy T-3.1 and Figure 16), and identifies River Road and Reservation Road as proposed scenic routes (Figure 16).

The project site is visible from a scenic-designated stretch of SR 68 for a distance of approximately 3,000 feet. The site is also visible from portions of Reservation Road, and from within the subdivision. The project site is adjacent to River Road, but is minimally visible from this road due to topography and vegetation, as well as the River Road/SR 68 intersection.

Section 5.0, *Aesthetics*, of the Draft SEIR, lists the policies related to aesthetic impacts that are applicable to the project under the Monterey County General Plan, LPRSP, and the Toro Area Plan. As described therein, the LPRSP EIR anticipated that views from River Road would become more urbanized, and that development would be visible from scenic-designated SR 68. The LPRSP EIR established mitigation measures to reduce aesthetic impacts associated with development of the Las Palmas Ranch Plan Area. Those measures, such as tree planting and a River Road setback, are incorporated into the plans of the proposed project. Development of the project site, therefore, does not represent an aesthetic impact that has not previously been analyzed and found to be less than significant. However, the Draft SEIR for the proposed project includes mitigation measures AES-1 through AES-4 in order to ensure that the project mitigates aesthetic impacts consistent with the LPRSP EIR. The project plans and mitigation measures also ensure compliance with the Toro Area Plan, which requires that development in visually sensitive areas is located and designed to enhance the scenic value of the area. The mitigation measures require landscape screening, earth toned building colors, undergrounding of utility and distribution lines, and unobtrusive lighting; for the full text of mitigation measures, refer to Section 5.0, *Aesthetics*.

Private Views

As noted in Section 5.0, *Aesthetics*, of the Draft SEIR, views of the site from within the subdivision are obstructed by single family residences and existing topography. Views from residences within the existing subdivision are not addressed in further detail in the Draft SEIR. The County of Monterey General Plan does not protect private views, and CEQA does not require a detailed evaluation of individual private views, particularly when only a limited number of private views would be affected by site development activities. Therefore, although some homeowners may be

able to see the proposed development from their private residences, the impact is not significant for purposes of the EIR.

The project plans include planting a mix of mature plants to provide some immediate screening of the site, along with younger, faster growing plants to provide long-term screening. Additionally, the mitigation measures described above would contribute to screening the project and improving the aesthetic blending of the proposed structures. However, several commenters discuss the project's use of landscaping to screen views of the project site, contending that the proposed screening would not completely hide the proposed structures from view.

As described above, the project would be visible from surrounding roads, including subdivision roads. While landscaping and other measures would be required to control the project's visual impacts, the project would not be required to be completely hidden from sight. Under CEQA, substantial degradation of a site's visual character or quality constitutes a significant aesthetic impact; mere visibility of a structure is not in itself a significant impact.

The project would add lighting to the site. The existing subdivision residences and the vehicular traffic on River Road generate the primary current sources of light and glare in the vicinity of the project site. The project would introduce new sources of light and glare by adding structures with lighting to a vacant site. Mitigation Measure AES-4 sets exterior lighting specifications designed to reduce the impact to a less than significant level, and requires approval of the project's lighting plan by the Monterey County Resource Management Agency prior to issuance of a building permit. Specifically, Mitigation Measure AES-4 requires that all exterior lighting be unobtrusive, down-lit, shielded, recessed, and designed to only illuminate the intended area. Therefore, lighting spillover outside of the site would be limited, and would not substantially increase the amount of light in the area. For a full description of lighting impacts and mitigation, refer to section 5.0, *Aesthetics,* of the Draft SEIR.

Ridgeline Development

Regarding the topic of ridgeline development, Section 5.0, *Aesthetics*, of the Draft SEIR states: "the proposed project will be visible from River Road, State Route 68, and Reservation Road, although it will not result in ridgeline development." Monterey County Code Section 21.06.950 defines "ridgeline development" as "development on the crest of a hill which has the potential to create a silhouette or other substantially adverse impact when viewed from a common public viewing area."

As described in Section 3.0, *Environmental Setting*, of the Draft SEIR, the project site is a plateaued area rising above River Road and the subdivision residences. Elevations at the site range from 70-210 feet above sea level. The common public viewing areas that the project would be visible from include short portions of River Road, in close proximity, and a portion of SR 68, at a distance.

Regarding whether or not the project site is "on the crest of a hill", the site is naturally elevated above its immediate surroundings. However, the broader surroundings include a range of elevations, with nearby hills of substantially greater elevations. The project would create a silhouette from the public viewing areas mentioned above, although the structures would mostly be shielded by existing topography and vegetation, and would only be visible momentarily by moving vehicles.

To avoid a "substantially adverse impact when viewed from a common public viewing area," the project includes four mitigation measures to reduce visual impacts, as described earlier in this topical response. Taking into account the limited visibility of the project site from public viewing areas, the natural shielding of the site due to vegetation and topography, the varied elevation

surrounding the site, and the mitigation measures to reduce visual impacts, the project would not be considered ridgeline development.

Topical Response G: Wildlife Impacts

Multiple comments were submitted that describe the wildlife that occurs, or has potential to occur, in the vicinity of the project site. Commenters state that the project's proposed construction and tree removal activity would displace or impact wildlife.

Under CEQA, potential impacts to wildlife are evaluated for the potential to be a significant impact. Impacts to common species are generally not considered a significant impact if a local or regional population would not be jeopardized. The site is primarily planted with nonnative trees, shrubs, and weedy species. Eucalyptus trees have been widely planted throughout California since the late 1800s, and often establish as invasive stands. They do provide habitat for common wildlife species, such as red-tailed hawks, mourning dove, scrub jay, and deer; but are less likely to support special status species (i.e. state and federally listed and other rare species). The small size of the project footprint, and the placement of the project site among residential and agricultural development decreases the value of habitat for special status wildlife. Impacts to common wildlife species (including common birds) would not be considered significant under CEQA, and potential impacts to special status wildlife, and non-special status birds protected under the California Fish and Game Code are mitigated through implementation of the Draft SEIR mitigation measures (Measures BIO-1 through BIO-5) requiring preconstruction surveys and avoidance, and through the implementation of the additional mitigation measures proposed in the response to letter 5 that will be included in the Final EIR.

Topical Response H: Noise

Multiple comments describe concerns about project-generated noise, including construction noise, traffic noise, operational noise at the senior assisted living community, and the noise from emergency vehicles that could potentially be frequently moving to and from the senior assisted living community.

The Draft SEIR addresses noise impacts in Section 11.0, *Effects Not Found to be Significant*. As discussed therein, impacts related to construction noise and vibration, on-site operational noise, traffic noise, and the exposure of new sensitive receptors to ambient noise would all be less than significant. However, the Draft SEIR does not include on-site noise measurements to establish baseline noise conditions, and it lacks a quantitative analysis of the project's noise impacts, both of which would help address the commenters' concerns. Therefore, this topical response provides additional information, including the results of new noise measurements and quantitative analyses where necessary for construction noise, on-site operational noise, and traffic noise. This additional information amplifies the Draft SEIR's noise analysis and does not represent substantial new information that could necessitate recirculation of the Draft SEIR.

Existing Noise Environment

To establish a baseline for existing ambient noise levels in and near the project site, as a baseline for judging the project's effects on the noise environment, five new noise measurements were taken in and near the site. Based on these noise measurements, page 11-7 of the Draft SEIR has been amended as follows to discuss the existing noise environment:

To quantify existing noise levels on and near the project site, one 24-hour noise measurement and four short-term noise measurements were taken using an ANSI Type II integrating sound level meter. Figure 11.2 shows the locations of these measurements with respect to the project site. The measurements were taken during midday hours on Wednesday, June 26, 2019. These measurements were located adjacent to residences on Country Park Road and to River Road. They were intended to be representative of existing traffic noise levels along River Road and at the nearest residences facing the project site. Table 11-1 summarizes the noise monitoring results.

Figure 11-2 Noise Measurement Locations

Fig X Noise Measurement Locations

Table 11-1

Noise Measurement Results

Measurement Location	Description	Primary Noise Source	Sample Time	Noise Level (L_{eq} dBA)
1	Northeast corner of project site adjacent to residence on Country Park Road (285 feet south of River Road centerline)	Traffic, birds	11:06 A.M. – 11:36 A.M.	48.3
2	Eastern property line adjacent to residence on Country Park Road (850 feet south of River Road centerline)	Traffic, animals	11:46 A.M. – 12:06 P.M.	46.7
3	South side of River Road to west of Las Palmas Road (120 feet south of River Road centerline)	Traffic	12:14 P.M. – 12:34 P.M.	66.3
4	North side of River Road to west of Country Park Road (100 feet north of River Road centerline)	Traffic, tractor	12:43 P.M. – 1:03 P.M.	67.1
24-Hour Noise Measurement	Northern edge of project site (175 feet south of River Road centerline)	Traffic	24 hours	70.0

[1] Figure 11-1 shows the noise measurement locations.
Refer to Appendix J for noise measurement results.

As shown in Table 11-1, existing ambient noise is as high as 70.0 dBA Leq at a distance of 175 feet from River Road, over the course of a 24-hour measurement period. (The metric L_{eq} is an equivalent noise level over a given period of time.) Ambient noise decreases with greater distance from River Road. At measurement locations 1 and 2 next to residences on Country Park Road, ambient noise during midday weekday hours ranged from 46.7 to 48.3 dBA Leq.

Noise Impacts

The Draft SEIR discusses noise impacts in Section 11.0, *Effects Not Found to be Significant.* As described therein, the project would not result in significant traffic noise impacts. The following supplemental discussion of noise impacts has been added to provide quantitative analyses where necessary for the issues of construction noise, on-site operational noise, and traffic noise.

Construction Phase

Page 11-7 of the Draft SEIR has been amended as follows to include quantitative modeling of temporary construction noise:

The Federal Highway Administration's Roadway Construction Noise Model (RCNM) was used to estimate the equipment noise levels for the proposed project at the nearest sensitive receptors for each phase of project construction: site preparation, grading, building construction, paving, and architectural coating. RCNM predicts noise levels based on the expected construction equipment in each phase of construction, empirical data for noise generated by this equipment,

the expected usage of equipment during each work day, and formulas to estimate sound attenuation from source to receiver. A list of anticipated equipment and the number of each piece of equipment during construction was obtained from default settings for senior retirement communities in the California Emissions Estimator Model (CalEEMod).

Construction noise levels would attenuate at a rate of approximately 6 dBA per doubling of distance. Ground absorption adds to the attenuation from distance alone. This analysis is conservative because it does not account for further attenuation from intervening topographic features or structures between construction equipment and receivers and does not account for soft-site attenuation. The analysis makes another conservative assumption that construction equipment would typically operate as close as 50 feet from sensitive receptors. This assumption does not take into account the fact that equipment is typically dispersed in various areas of a construction site, at greater distances from sensitive receptors. Due to site and equipment limitations, only a limited amount of equipment can operate near a given location at a particular time. Therefore, this analysis of construction noise impacts is highly conservative.

Construction activity on the project site would occur periodically during development of the proposed project, with the use of heavy equipment generating noise. Sensitive receptors that may be exposed to construction noise include existing residences in the Las Palmas Ranch #1 Subdivision to the east of the project site. Residences on Country Park Road, which parallels the eastern boundary of the project site, would be closest to construction noise on-site. In addition, assisted living facilities that would be built during an earlier construction stage could be exposed to noise generated by construction of subsequent buildings.

The effect of construction noise on sensitive receptors would depend on the type of activity being undertaken and the distance to the receptor location. Construction noise impacts are most severe if construction activities occur during times of day when people are most sensitive to noise (early morning, evening, or nighttime hours), in areas immediately adjoining noise-sensitive land uses, or when construction duration lasts over extended periods of time. Table 11-2 shows the maximum expected noise levels at distances of 50 and 100 feet from construction equipment, based on the combined use of equipment anticipated to be used concurrently during each phases of construction modeled in RCNM.

Table 11-2

Estimated Noise Levels by Construction Phase

Construction Phase	Equipment	Estimated Noise Levels at Nearest Sensitive Receptors (dBA L_{eq})	
		50 feet	100 feet
Site preparation	Backhoe, bulldozer, tractor	86	80
Grading	Backhoe, bulldozer, excavator, grader, scraper	87	81
Building construction	Backhoe, crane, forklift, generator, tractor, welder	89	83
Paving	Paver, roller	80	74
Architectural coating	Air compressor	74	68

As shown in Table 11-2, construction activity at a distance of 50 feet from sensitive receptors would generate noise levels up to an estimated 89 dBA L_{eq} during building construction, 87 dBA L_{eq} during grading, and 86 dBA L_{eq} during site preparation. These estimates are highly conservative because they assume no attenuation of noise by topographic features or intervening structures and construction activity adjacent to sensitive receptors.

Compliance with County requirements would reduce the exposure of sensitive receptors to temporary increases in construction noise. Section 10.60.040 of the Monterey County Code of Ordinances would prohibit nighttime construction activity that generates exterior noise levels of at least 45 dBA L_{eq} or 65 dBA L_{max}, between 10 p.m. and 7 a.m. (The metric L_{max} is a maximum noise level.) In addition, Policy S-7.9 in the Monterey County General Plan's Safety Element (2010) would prohibit construction activities that exceed "acceptable" noise levels "within 500 feet of a noise sensitive land use during the evening hours of Monday through Saturday, or anytime on Sunday or holidays, prior to completion of a noise mitigation study." This policy would apply to the proposed project because the existing measured 24-hour ambient noise level of 70.0 dBA L_{eq} in the project site exceeds the normally acceptable level of 60 dBA L_{eq} for residential land uses in Table S-2 of the Safety Element. Policy S-7.10 also would require the following standard noise reduction measures: ~~Construction activities on the project site would be subject to Monterey County construction noise standards, including:~~

- Construction shall occur only during times allowed by ordinance/code unless such limits are waived for public convenience;
- All equipment shall have properly operating mufflers; and
- Lay-down yards and semi-stationary equipment such as pumps or generators shall be located as far from noise-sensitive land uses as practical.

Adherence to construction noise restrictions in the Monterey County Code Chapter 10.60.40 and Monterey County General Plan Policies S-7.9 and S-7.10 would substantially reduce the exposure of sensitive receptors to temporary increases in construction noise, especially during sensitive evening and nighttime hours. As a condition of approval, the County would require that the project adhere to these General Plan policies to minimize construction noise. These requirements would reduce construction-related noise impacts to less than significant.

Based on the above analysis, construction of the project would have a less than significant noise impact, consistent with the Draft SEIR's analysis.

Operational Phase

The Draft SEIR's analysis of operational noise on page 11-7 has been amended as follows to identify specific sources of noise-generating equipment and to estimate noise levels from each type of equipment:

During operation of the proposed senior assisted living community, heating, ventilation, and air conditioning (HVAC) equipment would continuously generate noise. It is anticipated that HVAC equipment would be located on the rooftops of the proposed assisted living and senior assisted living facilities, which would be located as close as approximately 250 feet from the nearest residences on Country Park Road to the east. Rooftop-mounted HVAC equipment typically generates an average noise level of up to 70 dBA L_{eq} at a distance of 15 feet from the source (Illington & Rodkin 2009). Since noise from a point source would attenuate at a rate of approximately 6 dBA per doubling of distance from the source, it is estimated that HVAC noise

would decrease to 46 dBA L_{eq} at a distance of 250 feet. This noise level would not approach the existing measured 24-hour noise level of 70.0 dBA L_{eq} in the northern section of the project site. It would also not exceed the range of ambient noise measured during midday weekday hours next to residences on Country Park Road (46.7 to 48.3 dBA L_{eq}). Therefore, HVAC noise would not have a substantial effect on ambient noise at off-site sensitive receptors.

Infrequent sources of long-term noise during operation of the project would include emergency vehicles and emergency generators. Emergency vehicles would be used on occasion to transport seniors needing emergency care from the project site to medical facilities. Sirens from emergency vehicles on River Road would result in a short-term spike in ambient noise levels at nearby residences. However, there is an agreement in place that the Subdivision is a "no-siren zone." Furthermore, Section 10.60.040.C.3 of the County Code exempts "emergency vehicles being operated by authorized personnel or equipment used in an emergency, such as chain saws" from noise regulation. Emergency generators would rarely be used, except in the event of a disruption in the normal power supply and at infrequent intervals when automatically starting up. Generators typically create noise reaching 82 dBA L_{eq} at a distance of 50 feet from the source (FTA 2018). It is assumed that generators, if placed outside, would serve the proposed assisted living and senior assisted living facilities, which are located approximately 250 feet away from the nearest residences. At this distance, generator noise would be about 68 dBA L_{eq}, assuming no attenuation by intervening topography. As noted above, equipment used in an emergency is exempt from the County's noise ordinance. Therefore, equipment noise would not result in a long-term increase in noise levels.

~~The proposed project is not expected to produce significant temporary or continuous noise from on-site operations that would significantly increase exiting ambient noise levels. The proposed project does not include point sources of high intensity noise or sources that are unique or excessive relative to other types of residential uses.~~ Due to the nature of the use at a senior assisted living community, the daily activities would be mostly confined inside of buildings. Any outdoor activities are expected to be low intensity passive uses that would not generate excessive noise. ~~Design of the facility, berms, and landscaping would further preclude noise from travelling off the property. On-site operations would not generate noise with an intensity that exceeds county standards at the nearby noise sensitive residential use.~~ On-site noise sources during operation of the proposed project, including HVAC equipment, emergency vehicles, and emergency generators, would have a less than significant impact on long-term noise levels.

Based on the above analysis, operation of the project would have a less than significant noise impact, consistent with the Draft SEIR's analysis.

Traffic Noise

Pages 11-7 to 11-8 of the Draft SEIR have been amended as follows to include quantitative modeling of the proposed project's effect on traffic noise:

~~Increases in traffic generation may result during construction activities and from employee trips to and from the facility, which may elevate noise levels along local roadways. The Monterey County General Plan EIR concluded that the General Plan Noise Element provides sufficient analysis thresholds and recommendations for noise attenuation to effectively mitigation transportation noise impacts.~~ The project would increase traffic and traffic-related noise through the Subdivision during both the construction and operational phase.

Construction traffic would be temporary and would not have a long-term effect on traffic noise near the project site. The effect of operational traffic on ambient noise from traffic on River Road was estimated using the U.S. Department of Housing and Urban Development's Site Day/Night Noise Level (HUD DNL) Calculator (DNL calculation sheets can be viewed in Appendix J to the Final SEIR). The HUD DNL Calculator is an electronic assessment tool based on the HUD Noise Assessment Guidelines that calculates the Day/Night Noise Level from roadway traffic. Modeled noise levels are in terms of the Day/Night Noise Level (L_{dn}), a 24-hour metric which adds a penalty of 10 dBA to actual nighttime (10:00 p.m. to 7:00 a.m.) noise levels to account for the greater sensitivity to noise during that time period.

The noise analysis conducted with the HUD DNL Calculator is based on traffic volumes in the Riverview at Las Palmas Senior Housing Traffic Impact Analysis prepared in June 2017 (Higgins 2017). The nighttime percentage of trips was assumed to be the default value of 15 percent, and speed limit was set at 55 miles per hour (as posted). A modal split of 80 percent cars, 15 percent medium trucks, and 5 percent heavy trucks was assumed for River Road. Traffic on low-volume residential streets in the Subdivision was not modeled because it does not substantially contribute to ambient noise levels relative to traffic on River Road. Based on the roadway traffic volumes presented in the traffic study (Higgins 2017), the volume of average daily traffic on River Road would be approximately five to ten times higher than the volume of existing traffic plus project-generated trips on Subdivision streets. Therefore, traffic on River Road is the primary driver of ambient noise levels near the project site.

Two locations at ground level on the project site were analyzed with the HUD DNL Calculator, one where the 24-hour noise measurement was taken in the northern section of the project site (175 feet from River Road) and one where a 20-minute noise measurement was taken near the southern end of Country Park Road (850 feet from River Road). These locations were selected to reflect the range of ambient noise across the project site. While the HUD DNL Calculator does not account for differences in elevation between the noise source and sensitive receptors. intervening topography does partially block traffic noise in the southern portion of the project site. For this reason, it is expected that modeled noise in the southern portion of the project site would be higher than actual noise. Therefore, the approach to modeling traffic noise is conservative.

Using the HUD DNL Calculator, traffic noise in the project site at a distance of 175 feet from River Road was estimated at 68 dBA L_{dn} under both existing and with-project traffic conditions. At a distance of 850 feet from River Road, traffic noise was estimated at approximately 58 dBA L_{dn} under both existing and with-project traffic conditions. The addition of traffic generated by operation of the proposed project would not perceptibly increase traffic noise from River Road.

Project-generated traffic would also increase traffic volumes on residential streets in the Subdivision that lead to the project site, including Las Palmas Road, River Run Road, and Woodridge Court. However, these residential streets are secondary noise sources relative to River Road, and their traffic volumes would not increase to the extent that ambient noise at sensitive receptors would substantially increase. Therefore, the project would have a less than significant impact from increasing traffic noise.

As discussed above, modeling of traffic noise indicates that traffic generated by the project would have a less than significant noise impact, which is consistent with the Draft SEIR's analysis.

Topical Response I: Private Land Rights

Numerous comments regarding private land rights indicate fundamental disagreement between the commenters and the project applicant regarding the applicant's right to establish shared use of HOA-controlled facilities and resources. Commenters note that the Subdivision's roads, stormwater drainage facilities, and security service are privately maintained and funded by the HOA. Some commenters dispute the Draft SEIR's description of the project applicant as a member of the HOA; commenters acknowledge that the applicant has contributed payments to the HOA, but is not a member and has not been granted the access rights necessary for development of the project site.

Commenters state that the applicant would not have the right to connect the project to the Subdivision's stormwater drainage system. Regarding road use, multiple commenters use the phrase "ingress and egress" to refer to the limited rights of the applicant to use Subdivision roads, suggesting that construction vehicles would not be permitted to park on the roads and that senior assisted living center residents would not have the right to walk on them. Commenters also state that the project would burden the Subdivision's privately funded security service.

The disagreements regarding land use rights and site access are noted and will be taken into consideration by County decision makers. Section 4.0, *Project Description*, of the Draft SEIR states:

River Road provides the northern boundary of the property. There is no direct access from River Road and none is proposed. Access to the site is from the signalized intersection at River Road and Las Palmas Road to River Run, then Woodridge Court. River Road is a public road maintained by the County of Monterey. Las Palmas Road, River Run and Woodridge Court are private roads maintained by the Las Palmas Ranch Home Owners Association. Woodridge Court terminates at the entrance to the project site. Access to the proposed development will be by a private loop drive. The project applicants, who own the site, are currently members of the Las Palmas Ranch Home Owners Association and have paid dues to the association. The applicants will pay a proportionate share for the use of the roads and drainage system.

Pursuant to Monterey County Code (MCC) Section 21.64.320, Regulations relating to applications involving use of private roads, the project involves intensification of use of a private road. The applicant is a party to a private road, and would access the project site from River Road (a County road) via the following private roads: Las Palmas Road, River Run Road, and Woodridge Court. Based on evidence submitted by the applicant in the form of a grant deed (Document No. 2013046807; recorded July 24, 2013), the legal description attached to the grant deed describes an easement to the subject parcel over these private roads for ingress, egress, road and utilities. Hence, pursuant to MCC Section 21.64.320, the project is classified as a Tier 2 project subject to a private road maintenance agreement, but not subject to a private road agreement. In this case, the County would not apply a condition of approval to require submittal of a "private road maintenance agreement", because the applicable governing structure has not objected to the project and the County has no evidence of a substantive dispute between the applicant and the applicable governing structure regarding use of the private roads.

Several commenters acknowledge that the applicant makes payments to the HOA, but contend that those payments do not represent membership status.

While land use rights and road access privileges are not "environmental issues," these issues could influence project approval. A written agreement between the HOA and the applicant would be necessary in order to clarify fair share maintenance costs associated with use of the streets, drainage facilities, and security operations that are under the control of the HOA. Such an

agreement is not currently in place. It is outside of the scope of the EIR to facilitate a maintenance agreement between the applicant and the HOA. However, to clarify the relationship between the two parties, page 4-6 of the Draft SEIR is revised as follows:

> River Road provides the northern boundary of the property. There is no direct access from River Road and none is proposed. Access to the site is from the signalized intersection at River Road and Las Palmas Road to River Run Road, then Woodridge Court. River Road is a public road maintained by the County of Monterey. Las Palmas Road, River Run Road and Woodridge Court are private roads maintained by the Las Palmas Ranch Home Owners Association. Woodridge Court terminates at the entrance to the project site. Access to the proposed development will be by a private loop drive. The project applicants, who own the site, are currently members of the Las Palmas Ranch Home Owners Association and have paid dues to the association. The applicants will pay a proportionate share for the use of the roads and drainage system. An agreement would be required between the HOA and the project applicants, who own the project site, to clarify cost-sharing associated with use of the streets, drainage facilities, and security operations.

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Responses to Comments on the Draft SEIR

This section includes comments received during the circulation of the Draft Subsequent Environmental Impact Report (Draft SEIR) prepared for the River View at Las Palmas Assisted Living Senior Facility project (project).

The Draft SEIR was circulated for a 45-day public review period that began on March 12, 2018 and ended on April 25, 2018. The County of Monterey received 118 letters on the Draft SEIR. The commenters and the page number on which each commenter's letter appear are listed below.

Letter No.	Commenter	Affiliation	Date	Page No.
Public Agencies				
1	Scott Morgan, Director	State Clearinghouse	April 26, 2018	76
2	Christine Duymich, Air Quality Planner	Monterey Bay Air Resources District	April 13, 2018	79
3	Jennifer Bodensteiner, Associate Hydrologist	Monterey County Water Resources Agency	April 25, 2018	83
Organizations and Businesses				
4	Michael DeLapa, Executive Director	LandWatch Monterey County	March 27, 2018	100
5	Ed Mercurio, Biological Consultant	Biological Consultant	April 12, 2018	106
6	Michael DeLapa, Executive Director	LandWatch Monterey County	April 16, 2018	111
7	Chris D. Kinzel, Professional Engineer	TJKM Transportation Consultants	April 23, 2018	116
8	Christine G. Kemp	Noland, Hamerly, Etienne, & Hoss Attorneys at Law	April 24, 2018	124
9	Dale Ellis	Anthony Lombardo & Associates	April 24, 2018	144
10	Mike Weaver, Chair	Highway 68 Coalition	April 25, 2018	154
11	Mike Weaver, Chair	Highway 68 Coalition	April 25, 2018	159
12	Mark Kelton, Vice President	Domain Corporation	April 25, 2018	162
Public				
13	Nancy Iversen	Public	March 10, 2018	166
14	Marc and Irene Rosen	Public	March 14, 2018	168
15	Jacob Orozco	Public	March 18, 2018	172
16	Paul and Rebecca Clifton	Public	March 19, 2018	175
17	David and Céline M. Dalby	Public	March 19, 2018	177
18	Adam and Takako Kirk	Public	March 19, 2018	180
19	Rendell Requiro and Francoise McAvinchey	Public	March 19, 2018	182
20	Russell Schwanz	Public	March 19, 2018	184
21	Christian and Mihoko Dreyer	Public	March 20, 2018	187
22	Scott Porter	Public	March 20, 2018	189

Letter No.	Commenter	Affiliation	Date	Page No.
23	Robert Scranton and Gayle Todd	Public	March 20, 2018	193
24	Julianne Harris	Public	March 21, 2018	196
25	Stephen and Susan Hurst	Public	March 21, 2018	198
26	Wilbur and Cordelia Lee	Public	March 21, 2018	202
27	Susan Paoli	Public	March 23, 2018	204
28	Anne and Rafael Sanchez	Public	March 25, 2018	206
29	Jerry L. Crawford	Public	March 27, 2018	209
30	Michael J. Kulow	Public	March 27, 2018	214
31	Ralph and Julie Sutliff	Public	March 28, 2018	235
32	Lisa Tegtmeier	Public	March 28, 2018	243
33	Kent Tegtmeier	Public	March 29, 2018	249
34	Greg and Marie Cater	Public	March 30, 2018	253
35	Roberta and Theresa Sonniksen	Public	March 31, 2018	255
36	Jeffrey C. Dittrich	Public	April 2, 2018	257
37	David and Irmina Ratliff	Public	April 2, 2018	263
38	Roy Gobets	Public	April 4, 2018	269
39	Eunice Kim	Public	April 4, 2018	277
40	Yeo Keun Kim	Public	April 4, 2018	279
41	Yong Jin Kim	Public	April 4, 2018	281
42	Mark R. Neilson	Public	April 4, 2018	283
43	Nicole Neilson	Public	April 4, 2018	285
44	Gladys Allen	Public	April 5, 2018	287
45	Janet Barstad	Public	April 5, 2018	290
46	Sue McFeron	Public	April 5, 2018	295
47	Mr. and Mrs. Clarence Ruddell	Public	April 5, 2018	297
48	Robert Scranton	Public	April 5, 2018	301
49	Gayle Todd	Public	April 5, 2018	305
50	John and Nori Bridges	Public	April 6, 2018	308
51	Roy Gobets	Public	April 6, 2018	311
52	Lindsay and Anthony Romiza	Public	April 6, 2018	336
53	Jeannette Warzycki	Public	April 7, 2018	340
54	Todd Ruston	Public	April 8, 2018	345
55	Dr. John Clark and Dr. Eveline Clark	Public	April 8, 2018	347
56	Richard Fontana	Public	April 9, 2018	350
57	Scott Cooper	Public	April 10, 2018	360
58	Tim Donlon	Public	April 10, 2018	362
59	Jeremiah and Jennifer Ruttschow	Public	April 10, 2018	364
60	Paula Browning	Public	April 11, 2018	366
61	Roy Browning	Public	April 11, 2018	368
62	Angela Caraccioli	Public	April 11, 2018	370

Letter No.	Commenter	Affiliation	Date	Page No.
63	Terry Bowen	Public	April 13, 2018	372
64	Jennifer M. Lukasik	Public	April 13, 2018	374
65	Mark and Camille Reith	Public	April 13, 2018	381
66	Joyce Shimamoto	Public	April 13, 2018	383
67	C. Denise Benoit	Public	April 15, 2018	385
68	Jayne Carolan	Public	April 15, 2018	391
69	David Tucker	Public	April 15, 2018	393
70	Vince and Dorey Cardinale	Public	April 16, 2018	442
71	Kurt Krieg	Public	April 16, 2018	446
72	Melody McDonald	Public	April 16, 2018	448
73	Tom Mercurio	Public	April 16, 2018	450
74	Suzanne Snyder	Public	April 16, 2018	468
75	Megan Castillo	Public	April 17, 2018	470
76	Lan Clayton	Public	April 17, 2018	473
77	Joseph A. Goncalves	Public	April 17, 2018	475
78	Nancy Montana	Public	April 17, 2018	478
79	Dennis and Yukiko Yonemitsu	Public	April 17, 2018	480
80	Lynn Dittrich	Public	April 18, 2018	482
81	Alan and Chris Bockenstedt	Public	April 19, 2018	486
82	Joseph L. Occhiuto	Public	April 19, 2018	490
83	Fred and Marilyn Adams	Public	April 20, 2018	495
84	Alan and Myra Anthony	Public	April 20, 2018	498
85	Roy Gobets	Public	April 20, 2018	506
86	David C. Dalby	Public	April 20, 2018	509
87	Veronica Ramirez	Public	April 20, 2018	549
88	Shelley Donati	Public	April 20, 2018	551
89	Otavio and Leila Bernardo	Public	April 21, 2018	555
90	Anita Cochetti	Public	April 22, 2018	571
91	Kathy Della-Rose	Public	April 22, 2018	574
92	Jennifer Lorentz	Public	April 22, 2018	578
93	Kathleen Vosti	Public	April 22, 2018	582
94	Anthony and Jocelyn Driskill	Public	April 23, 2018	584
95	Melissa Fanning	Public	April 23, 2018	588
96	Martin Johnson and Robin Matthews-Johnson	Public	April 23, 2018	592
97	Ron Provost and Linda Ipong	Public	April 23, 2018	600
98	Rachel Sullivan	Public	April 23, 2018	605
99	Stephanie Trost	Public	April 23, 2018	607
100	Richard Yraceburu	Public	April 23, 2018	609
101	Javier Aldape	Public	April 24, 2018	611

Letter No.	Commenter	Affiliation	Date	Page No.
102	Mark Miller	Public	April 24, 2018	614
103	David Nordstrand	Public	April 24, 2018	619
104	Karen Nordstrand	Public	April 24, 2018	621
105	Denise Donati	Public	April 24, 2018	623
106	Dominique Fontana	Public	April 24, 2018	626
107	Joshua and Amelia Freshwater	Public	April 24, 2018	633
108	Evette and Jim Kirby	Public	April 24, 2018	635
109	Randy Radke	Public	April 24, 2018	637
110	Kimberly Zook	Public	April 24, 2018	643
111	Megan Giovanetti	Public	April 25, 2018	647
112	James and Cynthia Grover	Public	April 25, 2018	652
113	Leonid Ivanov and Tetyana Margolina	Public	April 25, 2018	654
114	Mary Koch	Public	April 25, 2018	660
115	Roberta Pastorino	Public	April 25, 2018	662
116	Lisa and Anthony Silva	Public	April 26, 2018	664
117	Roy Gobets	Public	August 14, 2018	666
118	Nancy Iversen	Public	September 13, 2018	671

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

Where a comment resulted in a change to the Draft SEIR text, a notation is made in the response indicating that the text is revised. Changes in text are signified by strikeouts (~~strikeouts)~~ where text is removed and by underlined font (<u>underlined font</u>) where text is added.

Letter 1

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

RECEIVED
APR 30 2018
Monterey County RMA

April 26, 2018

Joseph Sidor
Monterey County
1441 Schilling Place, 2nd floor
Salinas, CA 93901

Subject: River View at Las Palmas Assisted Living Senior Facility
SCH#: 2017031025

Dear Joseph Sidor:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. The review period closed on April 25, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. 1.1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL 1-916-445-0613 FAX 1-916-558-3164 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2017031025
Project Title River View at Las Palmas Assisted Living Senior Facility
Lead Agency Monterey County

Type SIR Supplemental EIR

Description The proposed project includes a Specific Plan Amendment, Use Permit, and Design Approval for the construction and operation of a senior assisted living facility and associated site improvements on an approx 15.74-acre site at the location referenced. The facility would consist of the following components: 13 single story casitas providing 26 units and up to 42 beds, and ranging in size from approx 1,500 to 3,800 msf; a 43,400 sf, two story assisted living facility consisting of 40 units and up to 52 beds; and a 38,800 sf, three level memory care facility consisting of 39 units and up to 48 beds.

Lead Agency Contact

Name Joseph Sidor
Agency Monterey County
Phone 831-755-5262 **Fax**
email
Address 1441 Schilling Place, 2nd floor
City Salinas **State** CA **Zip** 93901

Project Location

County Monterey
City Salinas
Region
Lat / Long
Cross Streets River Road
Parcel No. 139-211-035-000
Township **Range** **Section** **Base**

Proximity to:

Highways 68
Airports
Railways
Waterways Salinas River
Schools Buena Vista MS
Land Use Residential-Medium Density 2.61 units per acre, with a Design Control Overlay (MDR/2.61-D)

Project Issues Traffic/Circulation; Water Supply; Landuse; Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Noise; Population/Housing Balance; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 4; Cal Fire; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 5; Department of Housing and Community Development; State Water Resources Control Board, Division of Drinking Water; Regional Water Quality Control Board, Region 3; Native American Heritage Commission

Date Received 03/12/2018 **Start of Review** 03/12/2018 **End of Review** 04/25/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

Letter 1

COMMENTER: Scott Morgan, Director, State Clearinghouse

DATE: April 26, 2018

Response 1.1

The commenter states that the State Clearinghouse submitted the Draft SEIR to applicable state agencies for review and acknowledges that the County has complied with the State Clearinghouse review requirements pursuant to CEQA. The commenter states that the review period closed on April 25, 2018 and that no state agencies submitted comments by that date. This comment is acknowledged and has been incorporated into the administrative record. No changes to the Draft SEIR are necessary to address this comment.

Monterey Bay Air Resources District
Serving Monterey, San Benito, and Santa Cruz Counties

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

Letter 2

April 13, 2018

Joseph Sidor
Associate Planner
Monterey County Resource Management Agency - Planning
1441 Schilling Place, 2nd Floor
Salinas, CA 93901 Email: sidorj@co.monterey.ca.us

Subject: Comments on the Draft SEIR for River View at Las Palmas

Dear Mr. Sidor,

Thank you for providing the Monterey Bay Air Resources District (Air District) the opportunity to comment on the above-referenced document. The Air District has reviewed the document and has the following comments:

General

- To prevent confusion, please include that Monterey Bay Unified Air Pollution Control District (MBUAPCD) is now referred to as the Monterey Bay Air Resources District (MBARD). 2.1

Air Quality

- Environmental Impact Analysis, Section 6.4, Pg.6-20: Please identify whether any new stationary sources, such as a boiler or generator, would be part of the proposed project. These types of stationary sources may be required to obtain a permit from the Air District. Please contact the Air District if you have questions about permitting, (831) 647-9411. 2.2

  Diesel Exhaust, Section 6.4, Pg 6-20: While the Air District appreciates the mitigation measures to be instituted in an effort to reduce impacts from diesel exhaust, the Air District suggests using cleaner construction equipment for the project. This includes equipment that conforms to ARB's Tier 3 or Tier 4 emission standards. We further recommend that, whenever feasible, construction equipment use alternative fuels such as compressed natural gas, propane, electricity or biodiesel. 2.3

- Impact Summary and Mitigation Measures, Section 6.5, Pg.6-21: Due to the importance of limiting air quality impacts from construction-related emissions of PM_{10}, the Air District appreciates the inclusion and use of *Feasible Mitigation Measures* (2008 CEQA Air Quality Guidelines, pg. 8-2). 2.4

Greenhouse Gas Emissions

Section 8.4 paragraph 8, Pg 8-22 and Section 8.5 ascertain that *"..the proposed project would have a less-than-significant impact from generation of GHG emissions. No mitigation measures are required.*" Please support your claim. If CalEEMod was utilitzed, please include the tables. 2.5

The Air District recommends including a quantitative analysis of potential GHG emissions from the project. In lieu of a final Climate Action Plan, GHG emissions can be evaluated based on the

thresholds adopted by either the Bay Area Air Quality Managmenet District or the San Luis Obispo Air Pollution Control District.

Transportation

Page 9-1: To further reduce future congestion, the Air District highly recommends using Adaptive Signal Control Technology (ASCT) at the intersections within the vicinity of the project site to the SR 68 ramp intersections with Reservation and River Roads. According to the US Dept. of Transportation, ASCT has many benefits over conventional signal systems, such as improving traffic flow, faster responses to traffic conditions, and cutting costs. 2.6

Significant Unavoidable Impacts

Page 15-2 TRA-2:
The Air District is pleased to see a shuttle service proposed. To further reduce the indirect impacts of increasing number of vehicles on the road and a corresponding increase of criteria air pollutants, please consider an electric shuttle (fleet) and incorporating electric vehicle (EV) infrastructure to the project for both shuttle and visitors. Given the growing use of EVs, including stub-outs for EVs will help with future demand. 2.7

Please let me know if you have any questions. I can be reached at (831) 718-8027 or cduymich@mbard.org.

Best Regards,

Christine Duymich
Air Quality Planner

cc: David Frisbey

Letter 2

COMMENTER: Christine Duymich, Air Quality Planner, Monterey Bay Air Resources District

DATE: April 13, 2018

Response 2.1

The commenter notes that Monterey Bay Unified Air Pollution Control District (MBUAPCD) is now referred to as the Monterey Bay Air Resources District (MBARD).

The Draft SEIR is revised as follows to clarify the name of the air pollution control district as MBARD. Any reference to MBUAPCD thereafter in the Draft SEIR has been revised to MBARD.

Page 6-1, paragraph 1:

This section of the EIR includes evaluation of proposed project impacts on air quality at a level commensurate with the project description. Unless otherwise noted, the discussion in this section is based upon independent site investigation, information found in the *2005 Report on Attainment of the California Fine Particulate Standard in the Monterey Bay Region - Senate Bill 656 Implementation Plan*, *Monterey Bay Air Resources District (MBARD, formerly known as Monterey Bay Unified Air Pollution Control District) 2012-2015 Air Quality Management Plan*, *Monterey Bay Unified Air Pollution Control District CEQA Air Quality Guidelines*, California Emissions Estimator Model results (Appendix C), *County of Monterey General Plan*, *Toro Area Plan*, and the *Las Palmas Ranch Specific Plan.*

Response 2.2

The commenter requests that the Draft SEIR identify whether any new stationary sources of air pollution would be part of the project, as such sources may require a permit from MBARD.

The operating permit requirement for stationary sources of air pollution is included on page 6-7 in Section 6.0, *Air Quality*, of the Draft SEIR, under the heading *Stationary Source Emissions*. The project's stationary sources of air pollution would include natural gas combustion for the heating of water and space. The comment on permitting is noted and herewith shared with the County's decision makers for their consideration.

Response 2.3

The commenter recommends using cleaner construction equipment, including equipment that conforms to the California Air Resource Board's Tier 3 or 4 emission standards. The commenter recommends that construction equipment use alternative fuels.

In response to this comment, the following measure has been added to the end of Mitigation Measure AQ-3 on page 6-22 to 6-23 of the Draft SEIR:

- Whenever feasible, construction equipment shall use alternative fuels such as compressed natural gas, propane, electricity or biodiesel.

Response 2.4

The commenter notes the importance of limiting air quality impacts from construction-related emissions, and voices appreciation for the Draft SEIR's inclusion of feasible mitigation measures. The

comment is noted. Because these measures are included in the Draft SEIR, no revisions to the Draft SEIR are required.

Response 2.5

The commenter requests support, including quantitative analysis, for the Draft SEIR's determination that the project would have a less than significant impact from generation of GHG emissions. The commenter requests inclusion of CalEEMod results.

The commenter is referred to Appendix C of the Draft SEIR, which provides CalEEMod results. Analysis of the project's GHG emissions used an efficiency metric threshold of 4.88 MT CO2e per service population. The project's efficiency metric would be 3.99 MT CO2e. For a full description of the finding of significance for GHG emissions, refer to Section 8.0, *Greenhouse Gas Emissions*, of the Draft SEIR.

Response 2.6

The commenter recommends that the project use Adaptive Signal Control Technology (ASCT) at the intersections within the vicinity of the project site.

As described in Section 9.0, *Transportation & Traffic*, of the Draft SEIR, the project would result in less than significant impacts to intersections near the project site. Because impacts would be less than significant, mitigation requiring that the project applicant install ASCT would not be warranted. However, as a part of cumulative improvements at the SR 68/Reservation Road-River Road interchange, adaptive traffic signal control would routinely be considered in the design, subject to Caltrans approval.

The commenter's recommendation is noted and is herewith shared with the County's decision makers for their consideration.

Response 2.7

The commenter notes appreciation that a shuttle service is proposed. The commenter recommends that the shuttle fleet utilize electric vehicles and that the project incorporates electric vehicle infrastructure.

In response to this comment, the following revision has been made to the applicant-proposed mitigation measures, as listed on page 9-23 of the Draft SEIR:

> To reduce overall trip generation to and from the project site, the project developer shall prepare a detailed plan for shuttle service. Shuttle services shall be offered to residents to access areas on the Monterey Peninsula and in Salinas from the project site. Additionally, shuttle service to nearby transportation hubs for employees shall be offered in the shuttle service plan. <u>If feasible, the shuttle fleet shall be electrically-powered, and electric vehicle (EV) infrastructure should be added to the project for both shuttle and visitor use.</u> The shuttle service plan shall be submitted for review and approval to Monterey County prior to approval of any building permits on the project site.

Letter 3

Received by RMA-Planning
on April 26, 2018.

MONTEREY COUNTY

WATER RESOURCES AGENCY

PO BOX 930
SALINAS , CA 93902
(831)755-4860
FAX (831) 424-7935

DAVID E. CHARDAVOYNE
GENERAL MANAGER

STREET ADDRESS
1441 Schilling Place North Building
SALINAS, CA 93901

Apr 25 2018

In Reply to:
Monterey County, DEIR for PLN 150372

Monterey County RMA-Planning Department
c/o Joe Sidor, Associate Planner

Dear Mr. Sidor,

DRAFT EIR, **RIVERVIEW LAS PALMAS, PLN 150372**

The Monterey County Water Resources Agency (MCWRA) has received the DEIR for the above project. The purpose of this letter is to provide comments relevant to the policies, regulations, and potential environmental impacts which should be considered for the project, specifically those regarding long-term water supply, water conservation, flood and storm water drainage control, and groundwater recharge. To advise on these matters, the MCWRA has prepared the following comments:

LONG-TERM SUSTAINABLE WATER SUPPLY

Table 3-1; and Section 10.0 Water Supply . *Policy Consistency Review*. The table should be revised to include the following Monterey County 2010 General Plan policies specific to ensuring that the new development is assured a long-term sustainable water supply, *including* PS-3.2. The DEIR should evaluate consistency with PS-3.1 *and* PS-3.2, the presumption of long-term sustainable water supply for the project. Background: On October 26, 2010, Monterey County adopted a General Plan Update that included PS-3.2, which requires that the General Manager of the MCWRA advise the County prior to the County's determination of the availability of a Long Term Sustainable Water Supply for new development. Thereafter, a settlement agreement was reached and amendments were made to policy PS-3.1. The result was such requirements shall not apply to development within Zone 2C of the Salinas Valley groundwater basin (which this project is) provided the County prepares or causes to be prepared a study for the Board of Supervisors regarding Zone 2C *by* March 31, 2018 (see –attachment). The County has not completed is study for the Board of Supervisors regarding Zone 2C by the March 31, 2018. Based on the existing groundwater studies[1] and the State's designation of the "critically overdrafted" Pressure 180/400 aquifer and the Eastside subarea of Salinas Valley Groundwater Basin[2], the County should consult with the MCWRA General Manager for advice as to whether there is long-term sustainable water supply available at this time for the project. A determination of Long Term Sustainable Water Supply should be included with the DEIR. 3.1

[1] Brown and Caldwell (2015). State of the Salinas Valley Groundwater Basin. Prepared for the Monterey County Resource Management Agency, Salinas, CA. http://www.co.monterey.ca.us/home/showdocument?id=19586
[2] http://www.water.ca.gov/groundwater/sgm/pdfs/GW_basinsCriticalOverdraft_SCentralRegion.pdf

WATER SUPPLY SECTION 10.0

Overall this section and the project design should be revisited to place more emphasis on on-site water conservation measures; reduced groundwater volumes pumped by the California American Water Company in recent years due to conservation efforts; and, include a Potable Water Demand Estimate that is realistic and representative of water usage on average systems such as California American Water not those under strict conservation/reduction orders from the State of California such as MPWMD and its Cal Am – Monterey District system. 3.2

Groundwater Supply, Demand, and Basin Overdraft. *Reduced consumption of water by the California American Water Company in its Salinas District area.* In providing a more complete analysis of residential water use consumption, the preparer of the DEIR may want to consider incorporating more information from the 2015 California Water Service Urban Water Management Plan, Salinas District June 2016. Specifically how the system has demonstrated an actual reduction in overall retail groundwater volume pumped between the years of 2011 and 2015 (see attachment – from 2015 UWMP, table 6-1, pg 57 and 58). Water conservation among its users has helped California Water Service achieve this measure of reduced groundwater pumping. However, it is important to note that in this same area of the 2015 Plan it reveals an overall decline in district well level averages (figure 6-1). *Notice figure 6-1 indicates a decline in groundwater water levels, on average, for districts well. The project may want to strongly consider reducing its impact on ground water demand be incorporating strict and effective on-site water conservation measures. There is no discussion in the DEIR of what verifiable measures will put in place to provide for water conservation. Decision makers are looking for these types of *project benefits*. It is the advice of the MCWRA that this project shows some measurable benefit it's in overall water demand through water conservation efforts. The overall demand on the system is projected to increase in the number of service connections over time (see attachment – from 2015 UWMP, Figure 4-3). It may be prudent to provide a compelling reason as to how the new service connection for this project will be one that implements strict water conservation measures, and how it might possibly contributes waste water to the Monterey One Water System (formerly Monterey Regional Water Pollution Control Agency), or a similar type of waste water recycling system. 3.3

Table 10-1 River View at Las Palmas Potable Water Demand Estimate. *Using Monterey Peninsula Water Management District (MPWMD) Fixture Unit Methodology.* The project should not rely on MPWMD water fixture unit methodology for its analysis of water demand. The Monterey County Planning Commission has commented on past project's reliance on MPWMD methodology noting that the water demand totals are generally very low and possibly not representative of actual water usage outside of the MPWMD. It commonly known that actual per capita consumption of water in the MPWMD boundary is some of the lowest in the state. The factors contributing to these much lower than average demands are due to State orders to reduce illegal pumping of the Carmel River; "conservation pricing" resulting in higher water costs for those over conservative baseline tiers, and the comprehensive water conservation and rebate programs of the MPWMD. Using the MPWMD methodology to estimate water use demands for projects outside their district is not a like for like comparison. MCWRA believes there is data that would show the per capita water usage in the MPWMD is much lower on average than that of California American Water Supply. The project should use another methodology for water demand and a qualified engineer should be relied upon to prepare such an estimate of Water Demand. 3.4

EFFECTS NOT FOUND TO BE SIGNIFICANT SECTION 11.0 Hydrology, Storm Water Runoff, Flood Hazards The project could have a significant effect on creating additional storm water runoff and creating flood and storm water hazards to downslope properties. The DEIR should include a flood and storm water control plan to evaluate if the project will substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. The project is large in scale with its newly created impervious surfaces 3.5

totaling over 4 acres. **The MCWRA recommends that a preliminarily flood and storm water control plan be prepared and included with the DEIR.** The public should be informed of the expected storm-drainage improvements that will need to be in-place to appropriately control flood and storm water drainage. The DEIR should include **specific flood and storm water performance standards to be required of the project through a MITIGATION MEASURE including** that the project shall **include facilities to limit discharge of the 100-year storm event post-development peak flow to the 10-year storm event pre-project peak flow**. Recommended mitigation measure & the preliminary flood and storm water control analysis plan should address the following design standards: The applicant shall provide a preliminary flood and storm water drainage management plan, prepared by a registered civil engineer, to mitigate off-site peak flow stormwater runoff from the area being developed. The plan for the project shall include facilities to limit discharge of the 100-year storm event post-development peak flow to the 10-year storm event pre-project peak flow. Best management practices shall be incorporated into the plan to protect groundwater and surface water quality for runoff resulting from the paved parking areas. The plan shall include calculations and identify the location of all major drainage facilities including retention or detention basins, catch basins, and storm drain lines. The plan shall be review and approved by the Monterey County Water Resources Agency. Furthermore, the above described flood and storm water drainage analysis and plan is necessary to demonstrate consistency with the drainage/stormwater control/water supply policies contained within the Monterey County 2010 General Plan (Goal S-3) and the Toro Area Plan [Toro 5.1.2.1(T)]. The preliminary plan by Gateway Engineering 2016 does address these policies in general; however, a revised plan is required to incorporate the flood and storm water control design standards mentioned above and the following drainage and water quality policies of the two respective plans:

- **S-3.1**, Post-development, off-site peak flow drainage from the area being developed shall not be greater than pre-development peak flow drainage. On-site improvements of other methods for storm water detention shall be required to maintain post-development, off-site, peak flows, as determined by MCWRA.
- **S-3.2,** Best Management Practices to protect groundwater and surface water quality shall be incorporated into all development
- **S-3.3,** Drainage facilities to mitigate the post-development peak flow impact of new development shall be installed concurrent with new development.
- **PS-2.8** The County shall require that all projects be designed to maintain or increase the site's predevelopment absorption of rainfall (minimize runoff), and to recharge groundwater where appropriate. Implementation shall include standards that could regulate impervious surfaces, vary by project type, land use, soils and area characteristics, and provide for water impoundments (retention/detention structures), protecting and planting vegetation, use of permeable paving materials, bioswales, water gardens, and cisterns, and other measures to increase runoff retention, protect water quality, and enhance groundwater recharge
- **PS-2.9 c** Require construction of detention/retention facilities on large-scale development sites overlying important groundwater recharge areas as identified by the MCWRA.
- **5.1.2.1(T),** Developments shall be designed to maintain groundwater recharge capabilities on the property.

Thank you for the opportunity to review and comment on the project's environmental review. If you have any questions, please contact me at bodensteinerjm@co.monterey.ca.us or (831) 755-4970.

Sincerely,

ORIGINAL SIGNED BY:
Jennifer Bodensteiner, Associate Hydrologist
MCWRA Development Services

EXHIBIT 2

Proposed Amendments to Monterey County 2010 General Plan shown as changes from 2010 General Plan policies as adopted October 26, 2010

1. **PS-3.1**

PS-3.1 Except as specifically set forth below, new development for which a discretionary permit is required, and that will use or require the use of water, shall be prohibited without proof, based on specific findings and supported by evidence, that there is a long-term, sustainable water supply, both in quality and quantity to serve the development.

This requirement shall not apply to:

a. the first single family dwelling and non-habitable accessory uses on an existing lot of record; or

b. specified development (a list to be developed by ordinance) designed to provide: a) public infrastructure or b) private infrastructure that provides critical or necessary services to the public, and that will have a minor or insubstantial net use of water (e.g. water facilities, wastewater treatment facilities, road construction projects, recycling or solid waste transfer facilities); or

c. development ~~related to agricultural land uses~~ within Zone 2C of the Salinas Valley groundwater basin, provided the County prepares or causes to be prepared a study ~~report to~~ for the Board of Supervisors regarding Zone 2C, to be completed no earlier than October 31, 2017 and no later than March 31, 2018 that does the following ~~every five (5) years for Zone 2C examining the degree to which~~:

1) evaluates existing data for seawater intrusion and groundwater levels collected by Monterey County Water Resources Agency as of the date the study is commenced;

2) evaluates the total water demand for all existing uses and future uses ~~predicted~~ designated in the General Plan EIR for the year 2030 ~~will be reached~~;

3) assesses and provides conclusions regarding the degree to which the total water demand for all uses designated in the General Plan for the year 2030 are likely to be reached or exceeded;

~~2)~~ 4) evaluates on an annual basis during the study period groundwater elevations and the seawater intrusion boundary ~~have changed since the prior reporting period~~; ~~and~~

5) based on historical data and the data produced by the study, evaluates and provides conclusions regarding future trends and any expected movement of groundwater elevations and the seawater intrusion boundary;

6) should the study conclude that i) total water demand for all uses designated in the General Plan for the year 2030 is likely to be exceeded; or ii) groundwater elevations are likely to decline by the year 2030 and iii) the seawater intrusion boundary is likely to advance inland by the year 2030, the study shall make recommendations on measures the County could take to address any or all of those conditions; and

7) addresses such other matters and the Board of Supervisors determines are appropriate.

~~2) other sources of water supply are available.~~

~~If, following the periodic report, the Board finds, based upon substantial evidence in the record, that:~~

Within two months following the completion of the study, the Board of Supervisors shall hold an open and noticed public hearing on the results of the study. If the study reaches the conclusions for Zone 2C identified in subsection 6) i or 6) ii and 6) iii, the Board of Supervisors shall adopt one or more measures identified in the study, or other appropriate measures, to address the identified conditions. This exception for Zone 2C shall be a rebuttable presumption that a Long Term Sustainable Water supply exists within Zone 2C, and the presumption shall remain in effect until and unless the study reaches the conclusion for Zone 2C identified in subsection 6) i or 6) ii and 6) iii. Development in Zone 2C shall be subject to all other policies of the General Plan and applicable Area Plan.

Following completion of the study described herein, and the adoption of measures as may be recommended in the study, if any, the County shall prepare a report to the Board of Supervisors every five (5) years for Zone 2C that examines the degree to which ~~Thea~~) total water demand for all uses ~~in Zone 2C in 2030 as~~ predicted in the General Plan EIR for year 2030 will be reached; ~~is likely to be exceeded~~; or ~~it is reasonably foreseeable that the total water demand for all uses in Zone 2C in 2030 would result in one or more of the following in Zone 2C in 2030:~~ b) ~~declining~~ groundwater elevations, ~~further~~the seawater intrusion boundary have changed since the prior reporting period; and c) other sources of water supply are available.~~,~~ ~~increased substantial adverse impacts on aquatic species, or interference with existing wells, then the County shall initiate a General Plan amendment process to consider removing this agricultural exception in Zone 2C. Development under this agricultural exception shall be subject to all other policies of the General Plan and applicable Area Plan; or~~

~~d. development in Zone 2C for which the decision maker makes a finding, supported by substantial evidence in the record, that the:~~

~~1) development is in a Community Area or Rural Center and is otherwise consistent with the policies applicable thereto;~~

~~2) relevant groundwater basin has sufficient fresh water in storage to meet all projected demand in the basin for a period of 75 years; and,~~

~~3) benefits of the proposed development clearly outweigh any adverse impact to the groundwater basin.~~

2. **PS-3.3**

PS-3.3 Specific criteria shall be developed by ordinance for use in the evaluation and approval of adequacy of all domestic wells. The following factors shall be used in developing ~~C~~criteria ~~shall assess both~~ for both water quality and quantity including, but not limited to:

a. Water quality.
b. Production capability.
c. Recovery rates.
d. Effect on wells in the immediate vicinity as required by the Monterey County Water Resources Agency or Environmental Health Bureau.
e. Existing groundwater conditions.
f. Technical, managerial, and financial capability of the water purveyor of a water system.
g. Effects of additional extractions or diversion of water on in-stream flows necessary to support riparian vegetation, wetlands, fish, and other aquatic life including migration potential for steelhead, for the purpose of minimizing impacts to those resources and species.

This policy is not intended to apply to replacement wells

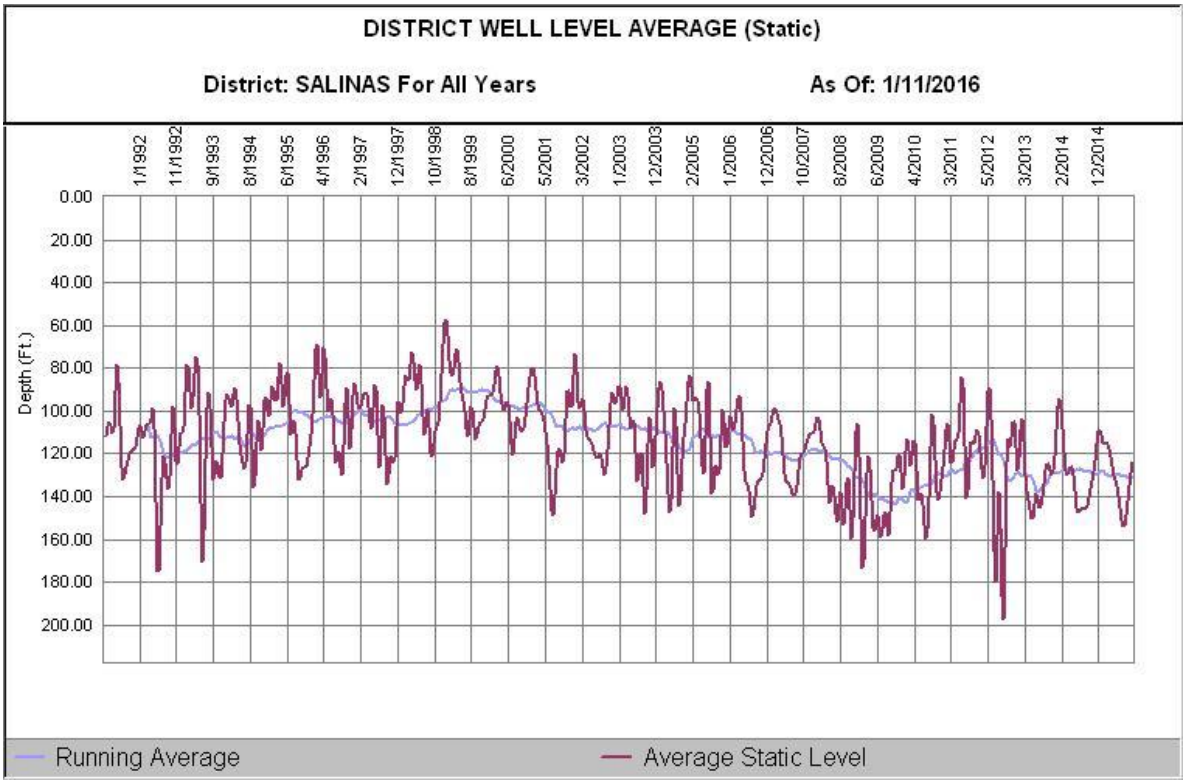
3. **PS-3.4**

PS-3.4 The County shall request an assessment of impacts on adjacent wells and instream flows for new high-capacity wells, including high-capacity urban and agricultural production wells, where there may be a potential to affect existing adjacent domestic or water system wells adversely or in-stream flows, as determined by the Monterey County Water Resources Agency. In the case of new high-capacity wells for which an assessment shows the potential for significant adverse well interference, the County shall require that the proposed well site be relocated or otherwise mitigated to avoid significant interference. ~~Specific criteria shall be developed~~ The following factors shall be used in developing criteria by ordinance for use in the evaluation and approval of adequacy of all such high-capacity wells, including not limited to:

a. Effect on wells in the immediate vicinity as required by the Monterey County Water Resources Agency or Environmental Health Bureau.
b. Effects of additional extractions or diversion of water on in-stream flows necessary to support riparian vegetation, wetlands, fish, and other aquatic life including migration potential for steelhead, for the purpose of minimizing impacts to those resources and species.

This policy is not intended to apply to replacement wells.

Figure 6-1: District Well Level Average (Static)



6.2.4 Historical Pumping

The volume of groundwater pumped since 2011 is shown in Table 6-1.

Table 6-1 Retail: Groundwater Volume Pumped (AF)						
Groundwater Type	Location or Basin Name	2011	2012	2013	2014	2015
Alluvial Basin	Salinas Valley Basin	18,043	18,615	19,060	17,422	14,659
Total		**18,043**	**18,615**	**19,060**	**17,422**	**14,659**

6.3 Surface Water

The Salinas District does not currently impound or divert surface water.

6.4 Stormwater

The City of Salinas has developed Stormwater Standard Plans and Stormwater Development Standards in the permitting process for new and redevelopment projects.

This documents contains both stormwater design requirements and design guidance intended to minimize the impacts of urban runoff to receiving waters and to promote healthy watersheds.

There are no plans to divert stormwater for beneficial reuse in the Salinas District.

6.5 Wastewater and Recycled Water

The recycling of wastewater offers several potential benefits to Cal Water and its customers. Perhaps the greatest of these benefits is to help maintain a sustainable groundwater supply either through direct recharge, or by reducing potable supply needs by utilizing recycled water for appropriate uses (e.g., landscape, irrigation) now being served by potable water. Currently, no wastewater is recycled for direct reuse in the District. The potential amount of recycled water that can be produced is proportional to the amount of wastewater that is generated by District, and is discussed in the following sections.

6.5.1 Recycled Water Coordination

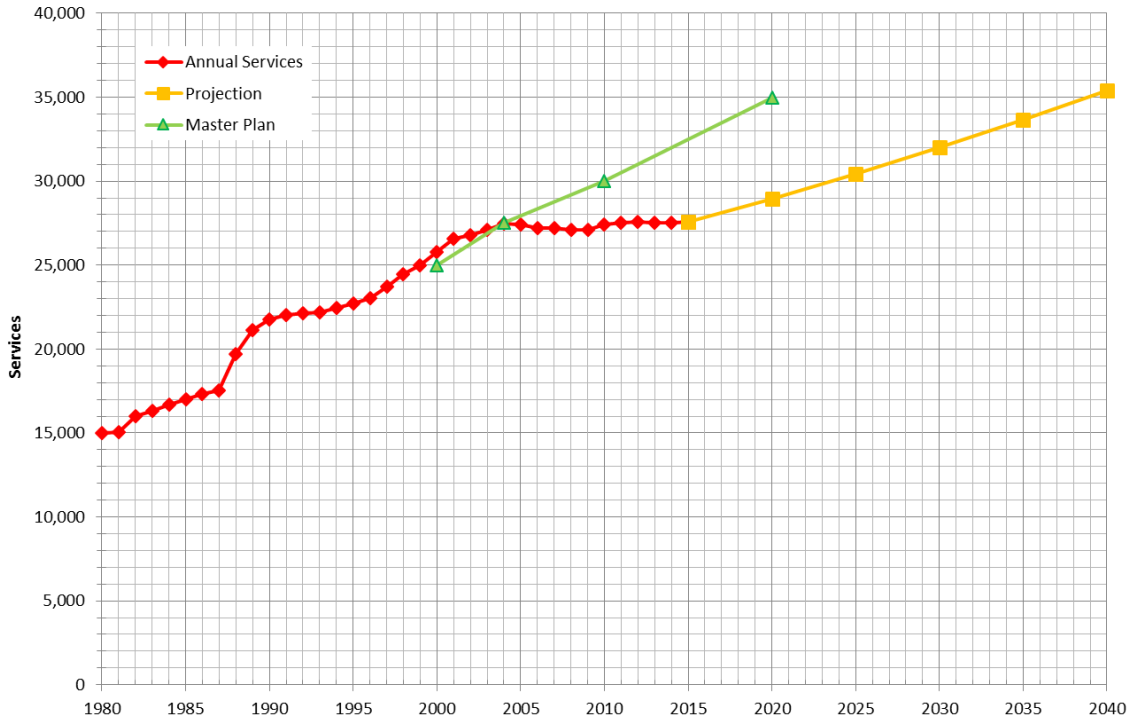
All of the recycled water facilities are maintained by the Monterey Regional Water Pollution Control Agency and are outside of the Salinas District area. There are no current plans to bring recycled water to District area. Cal Water will be coordinating with the City of Salinas and Monterey County about the potential for bringing recycled water into the District and developing a list of customers that could utilize that water during the update of the Water Supply and Facilities Master Plan which is planned for the near future.

6.5.2 Wastewater Collection, Treatment, and Disposal

The City of Salinas operates and maintains the sewer system consisting of gravity sewers, pumping stations, and force mains to collect wastewater from residential and industrial customers. The collected residential wastewater is discharged to trunk sewers and interceptors owned and operated by the Monterey Regional Water Pollution Control Agency (MRWPCA). The residential wastewater is conveyed to the MRWPCA Regional Treatment Plant for treatment. This facility is outside the Salinas District boundaries.

Industrial wastewater is treated at the City of Salinas Industrial Wastewater Treatment Plant, which has a capacity to treat 4 mgd but currently receives 2 mgd from industrial customers in Salinas. The wastewater at the industrial plant undergoes treatment with aeration ponds and is discharged to percolation/evaporation ponds without disinfection. Currently, treated wastewater from the industrial wastewater treatment plant is not recycled.

Figure 4-3. Historical and Projected Services



Expected water use per service, shown in Figure 4-4, is based on weather-normalized historical use, adjusted for future expected water savings from plumbing codes and District conservation programs. Weather normalization of historical use was done econometrically using the California Urban Water Conservation Council GPCD Weather Normalization Methodology. Expected water savings from plumbing codes are presented in Section 4.4. Expected water savings from District conservation programs and projected compliance with the District's SB X7-7 2020 per capita water use target are discussed in Chapter 9. The projected trend in average use per service shown in Figure 4-4 does not account for possible effects of climate change on future demand. The potential effects of climate change on demand are discussed in Section 4.6.

Projected water uses in Table 4-2 and Figure 4-4 are predicated on unrestricted demands under normal weather conditions. Demands are assumed to partially rebound by 2020 from 2015 levels on the assumption that the State Water Resources Control Board's mandatory water use reductions end by October 2016, as currently scheduled. The difference between actual and projected demands in 2020 will critically depend on the accuracy of this assumption. If the Emergency Drought Regulations are continued beyond October 2016, then the likelihood of actual demands being less than projected demands in 2020 would be significantly increased.

Letter 3

COMMENTER: Jennifer Bodensteiner, Associate Hydrologist, Monterey County Water Resources Agency (MCWRA)

DATE: April 25, 2018

Response 3.1

The commenter states that Draft SEIR's Policy Consistency Review table should be revised to include Monterey County General Plan policies regarding long-term water supply, specifically policies PS-3.1 and PS-3.2. The commenter states that the County should consult with the MCWRA General Manager regarding water supply for the project, and that the project should include a determination of Long Term Sustainable Water Supply.

Refer to Topical Response C for a policy consistency analysis, including the full text of Table 3-1, which was erroneously excluded from the Draft SEIR. In addition, page 10-10, paragraph 2, of the Draft SEIR is revised as shown below, to specifically reference the policies noted by the commenter. Also see Response 8.26 regarding MCWRA's report recommending measures to address seawater intrusion.

Monterey County General Plan

The Monterey County General Plan Land Use Element and Public Services Element provide the following goals, policies and objectives pertaining to water supply and distribution applicable to this project. Land Use Element goals LU-1 and LU-2 aim to concentrate development in areas where suitable access to services and facilities such as water and sewer.

Public Services Element policies PS-3.1, PS-3.2 and PS-3.3 address water supply and provide as follows:

PS-3.1 Except as specifically set forth below, new development for which a discretionary permit is required, and that will use or require the use of water, shall be prohibited without proof, based on specific findings and supported by evidence, that there is a long-term, sustainable water supply, both in quality and quantity to serve the development.

This requirement shall not apply to:

a. The first single family dwelling and non-habitable accessory uses on an existing lot of record; or
b. Specified development (a list to be developed by ordinance) designed to provide: a) public infrastructure or b) private infrastructure that provides critical or necessary services to the public, and that will have a minor or insubstantial net use of water (e.g. water facilities, wastewater treatment facilities, road construction projects, recycling or solid waste transfer facilities; or
c. Development within Zone 2C of the Salinas Valley groundwater basin, provided the County prepares or causes to be prepared a study for the Board of Supervisors regarding Zone 2C, to be completed no earlier than October 31, 2017 and no later than March 31, 2018 that does the following:

1) Evaluates existing data for seawater intrusion and groundwater levels collected by Monterey County Water Resources Agency as of the date the study is commenced.
2) Evaluates the total water demand for all existing uses and future uses designated in the General Plan EIR for the year 2030;
3) Assesses and provides conclusions regarding the degree to which the total water demand for all uses designated in the General Plan for the year 2030 are likely to be reached or exceeded;
4) Evaluates on an annual basis during the study period groundwater elevations and the seawater intrusion boundary;
5) Based on historical data and the data produced by the study, evaluates and provides conclusions regarding future trends and any expected movement of groundwater elevations and the seawater intrusion boundary;
6) Should the study conclude that i) total water demand for all uses designated in the General Plan for the year 2030 is likely to be exceeded; or ii) groundwater elevations are likely to decline by the year 2030 and iii) the seawater intrusion boundary is likely to advance inland by the year 2030, the study shall make recommendations on measures the County could take to address any or all of those conditions; and
7) Addresses such other matters as the Board of Supervisors determines are appropriate.

Within two months following the completion of the study, the Board of Supervisors shall hold an open and noticed public hearing on the results of the study. If the study reaches the conclusions for Zone 2C identified in subsection 6) i or 6) ii and 6) iii, the Board of Supervisors shall adopt one or more measures identified in the study, or other appropriate measures, to address the identified conditions. This exception for Zone 2C shall be a rebuttable presumption that a Long Term Sustainable Water Supply exists within Zone 2C, and the presumption shall remain in effect until and unless the study reaches the conclusion for Zone 2C identified in subsection 6) i or 6) ii and 6) iii. Development in Zone 2C shall be subject to all other policies of the General Plan and applicable Area Plan.

Following completion of the study described herein, and the adoption of measures as may be recommended in the study, if any, the County shall prepare a report to the Board of Supervisors every five (5) years for Zone 2C that examines the degree to which a) total water demand for all uses predicted in the General Plan EIR for year 2030 will be reached; or b) groundwater elevations, the seawater intrusion boundary have changed since the prior reporting period; and c) other sources of water supply are available.

PS-3.2 Specific criteria shall be developed by ordinance for use in the evaluation and approval of adequacy of all domestic wells. The following factors shall be used in developing criteria for both water quality and quantity including, but not limited to:

a. Water quality;

b. Authorized production capacity of a facility operating pursuant to a permit from a regulatory agency, production capability, and any adverse effect on the economic

extraction of water or other effect on wells in the immediate vicinity, including recovery rates;

c. Technical, managerial, and financial capability of the water purveyor or water system operator;

d. The source of the water supply and the nature of the right(s) to water from the source;

e. Cumulative impacts of existing and projected future demand for water from the source, and the ability to reverse trends contributing to an overdraft condition or otherwise affecting supply; and

f. Effects of additional extraction or diversion of water on the environment including on in-stream flows necessary to support riparian vegetation, wetlands, fish or other aquatic life, and the migration potential for steelhead, for the purpose of minimizing impacts on the environment and to those resources and species.

g. Completion and operation of new projects, or implementation of best practices to renew or sustain aquifer or basin functions.

h. The hauling of water shall not be a factor nor a criterion for the proof of a long-term sustainable water supply.

PS-3.3 Specific criteria shall be developed by ordinance for use in the evaluation and approval of adequacy of all domestic wells. The following factors shall be used in developing criteria for both water quality and quantity including, but not limited to:

a. Water quality.

b. Production capability.

c. Recovery rates.

d. Effect on wells in the immediate vicinity as required by the Monterey County Water Resources Agency or Environmental Health Bureau.

e. Existing groundwater conditions.

f. Technical, managerial, and financial capability of the water purveyor of a water system.

g. Effects of additional extraction or diversion of water on in-stream flows necessary to support riparian vegetation, wetlands, fish or other aquatic life, and the migration potential for steelhead, for the purpose of minimizing impacts on the environment and to those resources and species.

Page 10-13, paragraph 1, has also been revised to include a discussion of the proposed project's impacts in relation to these policies:

Monterey County General Plan

Policy PS-3.1. The first component of policy PS-3.1 is the requirement *to provide proof of a sustainable water supply to serve the development*. Policy PS-3.1 includes an exception to development in Zone 2C of the Salinas Valley groundwater basin, which would include the proposed project. Instead the provisions of subsection c. of the policy are applicable. Subsection c. requires the County to conduct a specific study on Zone 2C, conduct a hearing on the study

results, adopt measures to address identified conditions, and prepare a report every 5 years on the results of any measures. The requisite study and related actions have not been conducted.

Subsection c. further provides, "This exception for Zone 2C shall be a rebuttable presumption that a Long Term Sustainable Water Supply exists within Zone 2C, and the presumption shall remain in effect until and unless the study reaches the conclusion for Zone 2C identified in subsection 6) i or 6) ii and 6) iii. Development in Zone 2C shall be subject to all other policies of the General Plan and applicable Area Plan. Based on these considerations, the project is consistent with Policy PS-3.1, and the availability of a long-term water supply will be further discussion in conjunction with other policies below.

Policy PS-3.2. This policy provides guidance and criteria for the development of a County ordinance outlining the requirements for proof of a long term sustainable water supply and an adequate water supply system for new development requiring a discretionary permit. Thus, this policy is relevant to development of an ordinance that could be applied to the proposed project.

Nonetheless, this project is reviewed below applying these criteria:

- Water is the same quality as current local California Water Service wells and is thus, of acceptable water quality.
- The analysis in the Draft SEIR (Section 10.0, *Water Supply*, page 10-11) shows that the project would use 11.4 acre-feet of water per year (AFY), approved Specific Plan anticipated uses associated with 599-AFY, and is using only 182 AFY. With consideration of the proposed project, total water use in the entire Specific Plan Area would be 194 AFY. In addition, common area landscape irrigation would use recycled water, resulting in less than 11.4 AFY of potable water demand. The project water would demand represents a 0.002 percent increase in the annual groundwater extraction for Zone 2C. California Water Service has confirmed that it can and will serve the project, which indicates the applicable water purveyor for the site is able to provide water supply for the proposed project. See updated will-serve letter from California Water Service dated March 26, 2019 in Appendix I-2.
- California Water Service has demonstrated its technical, managerial and financial capabilities to deliver water.
- Potable water would be provided by California Water Service via its entitlements detailed in the Draft SEIR (Section 10.0, *Water Supply*, page 10-1). In addition, the property has rights to 2.5 acre-feet of reclaimed water which would further offset demand on potable water.
- As indicated in the Draft SEIR (Section 10.0, *Water Supply*, pp. 10-11 to 10-12), the project would increase potable water demand by up to 11.4 AFY. The "can and will" service letter provided by California Water Service for the proposed project indicates the applicable water purveyor for the site is able to provide water supply for the proposed project based on its existing facilities.
- The project does not involve any extraction or diversion of water but would utilize California Water Service water and recycled water associated with existing entitlements. In addition, the project would utilize water efficiency methods including water efficient fixtures, low-water use landscaping, and principles of low impact development in design to manage stormwater and emulate pre-development hydrologic conditions.
- The project would not adversely affect aquifer or basin functions and would not hinder other efforts to renew aquifer or basin functions.

- The project would not involve any hauling of water.

Therefore, substantial evidence related to proof of a sustainable water supply for the project includes the analysis and references in the Draft SEIR, including Section 10.0, *Water Supply,* the Cal Water will-serve letter include in Draft SEIR Appendix E, the updated will-serve letter attached herein (see Appendix I-2), the previous EIR for the Plan Area, and discussion and analysis in this response to comments/Final SEIR. The project is consistent with Policy PS-3.2.

Policy PS-3.3. This policy provides criteria for the evaluation of development of new domestic wells. The project does not involve any well development. Therefore, PS-3.3 would not be applicable.

Response 3.2

The commenter states that the Water Supply Section should include more emphasis on on-site water conservation measures and groundwater conservation. The commenter recommends that the section include a more appropriate potable water demand estimate.

See Response 3.3 regarding water conservation and groundwater conservation, and Response 3.4 regarding potable water demand estimate.

Response 3.3

The commenter recommends that the Draft SEIR include a discussion of groundwater conservation activities conducted by California Water Service (Cal Water) and suggests that project impacts on groundwater demand could be reduced by incorporating on-site water conservation measures. The comment also suggests adding discussion regarding the potential recycling of wastewater from the project.

As indicated in the comment letter, according to the 2015 California Water Service Urban Water Management Plan, Salinas District (2016), the system has demonstrated a reduction in overall retail groundwater volume pumped. Water conservation among its users has helped California Water Service achieve this reduction in the volume pumped between 2011 and 2015.

In response to this comment, the following revision has been made to the *Groundwater Impacts* section of the Draft SEIR, page 10-13:

MCWRA is a regional leader in the area for groundwater management efforts to reduce overdraft and increase the reliability of the water supply. Cal Water is supportive of these efforts and prepared to work with MCWRA and make necessary investments to augment future basin recharge. Relevant efforts are highlighted below.

- **Salinas Valley Water Project**. The Salinas Valley Water Project aims to address both overdraft and related sea water intrusion into the aquifer. Reservoirs were previously constructed to capture excess storm flow on the upper reaches of the Salinas River and its tributaries and recharge this water in the upper valley and Forebay sub-areas of the Salinas Valley. Monitoring and study of conditions is ongoing, along with evaluation of additional solutions to improve conditions.
- **Conservation Master Plan**. Cal Water has an aggressive conservation program that has and will continue to reduce per-capita usage via demand management measures. Cal Water has a variety of programs to help its customers use water efficiently and conducts comprehensive program analysis in a 5-year cycle in conjunction with the Urban Water Management Plan. Demand management measures include water waste prevention

ordinances, metering, public education and outreach, distribution system water loss management, water conservation program coordination, water efficiency rebate, giveaway and installation programs, among other efforts.

- **Greater Monterey County Integrated Regional Water Management Program**. Cal Water monitors and supports the goals of this plan, which include improving water supply reliability, protecting groundwater and surface water supplies, and promoting regional communication, cooperation and education regarding water resource managements.

Based on the above, and other considerations addressed in its Urban Water Management Plan, California Water Service projected that, under all hydrologic conditions, its groundwater supply for the Salinas District will fully meet future demands through 2040 (2016 California Water Service).

As presented earlier in the groundwater setting of this section, the average annual groundwater extraction for the four noted subareas that compose Zone 2C was about 523,000 AFY from 1959 to 2013. The proposed project would add 11.376 acre feet per year, which is a 0.002 percent increase. This contribution to the cumulative existing impact is not considerable, and therefore, is a less-than-significant impact.

Water Conservation Measures

Similar to existing users, the project would employ strict water conservation measures in construction, design and operation and maintain responsible use of water. Specific measures to be included are discussed further below.

Project design and development would be subject to the most current requirements of the County and the State which include provisions for water efficiency, including California Building Standards Code and the California Green Building Standards Code (CALGreen). The project would also be subject to County Ordinance No. 3932[1] regarding mandatory water conservation regulations which governs design and development, as well as the operation and use of water.

Water conservation design measures to be implemented in conjunction with the proposed project include the following conditions of approval:

- Use of non-potable water for common area landscaping
- Use of xeriscape and low-water use landscaping to be utilized. The project shall use vegetation that uses little to no water once established. No turf will be used.
- Water efficient fixtures:
  - Ultra-low-flow toilets (maximum 1.6 gallons)
  - Shower heads (maximum 2.5 gallons/minute)
  - Recirculating hot water systems where fixtures are more than 10-feet from source
- Implementation of low impact development (LID) principles in hydrologic and water quality design. Low impact development techniques enable water to infiltrate into the soil on-site, rather than runoff. Benefits of LID include reducing stormwater runoff, erosion, and downstream impacts of flooding and/or water pollution, recharge of water into the groundwater, filter of pollutants from water prior to metered release. Project development

[1] 1997 Monterey County Water Resources Agency. Ordinance No. 3932 *An Ordinance of the Monterey County Water Resources Agency Amending Ordinances Nos. 3539 and 3596 and enacting mandatory water conservation regulations*.

will incorporate these methods to promote recharge, reduce runoff, and filter water to emulate pre-development conditions.

In addition, the project would be required to comply with the operational provisions of Ordinance No. 3932, including:

- Immediately repair of water leaks including irrigation, pipes, faucets and fixtures
- Wash vehicles at a commercial washing facility or equip hoses with automatic shutoff nozzles or low volume/high pressure system
- Equip hoses used to clean exterior of structures with shut-off valves or low volume/high pressure system
- Prohibit use of potable water to clean sidewalks, driveways, roads, parking and other paved or hard surfaces, except to protect public health or safety
- Prohibit water to spill into streets, curbs, or gutters, which exceeds reasonable beneficial use
- Post water-conservation oriented placards in appropriate locations (bathrooms, kitchens, water faucets, etc.) to highlight conservation practices to residents, employees and visitors
- Provide literature to residents and employees describing the water conservation requirements of the facility

The project would also implement the following measures as conditions of approval during construction:

- If needed for dust suppression only recycled water would be used
- Soil shall be immediately stabilized following construction via erosion control measures and establishing of drought tolerant vegetation

Project Wastewater

The region has seen an overall demand in wastewater as users seek alternatives to potable water for irrigation of landscaping, golf courses, and other recreation facilities. Wastewater from the project site would be collected and treated at Las Palmas Ranch Wastewater Treatment Facility operated by California American Water Company. The wastewater would be recycled and used for irrigation.

Response 3.4

The commenter states that the project should not rely on water fixture unit methodology provided by the Monterey Peninsula Water Management District (MPWMD) for water demand analysis. The commenter states that the Monterey County Planning Commission considers MPWMD demand totals to provide low estimates of usage outside of the MPWMD boundary due to comprehensive water conservation measures and rebate programs. The commenter does not recommend an alternative methodology or data, merely referencing other data.

The proposed project would be new, and be designed, constructed, and operated with water conservation in consideration at the outset. The project would utilize the most current water efficient fixtures available, use minimal water for landscaping, and practice conservation in every day operation, as detailed in Response 3.3 above. As a result, the project is fully expected to have below average water use for a facility of its type. The methodology employed remains appropriate.

In addition, it should be noted that even if water use was underestimated, a doubling of the water used would still be considered less than significant. As indicated in the Draft SEIR (Section 10.0, *Water Supply*, page 10-3), the average annual groundwater extraction for Zone 2C was approximately 523,000 AFY from 1959 to 2013. At a doubling of the estimated water use, the project would use 22.8 AFY, and would result in an increase of 0.0044%.

Although Zone 2C is currently in overdraft, actions taken by both California Water Service and MCWRA, including conservation, system improvements, and future projects are projected to continue to provide for a reliable water supply. Refer to Response 3.3 for additional information.

Response 3.5

The commenter states that the project could have a significant effect on stormwater runoff and flood hazards and suggests that the Draft SEIR should include a preliminary flood and storm water control plan. The commenter provides specific items to be included in said plan.

Please refer to Topical Response E. As indicated therein, a Conceptual Stormwater Control Plan was prepared for the project by Gateway Engineering, Inc. and has been developed for the project as part of the preliminary design to address stormwater management for the project site in conformance with County and State regulatory requirements. The site drainage is specifically designed to meet County and regulatory requirements, and emulate pre-development conditions, resulting in the water volume, rate and quality of stormwater leaving the site would be similar to current conditions. As a result, there would be no project-related downstream or off-site impacts related to flood hazards or stormwater quality related to project operation.

Received by RMA-Planning
on March 27, 2018.

Letter 4

March 27, 2018

Joseph (Joe) Sidor, Associate Planner
Monterey County Resource Management Agency – Planning
1441 Schilling Place, 2nd Floor
Salinas, CA 93901
sidorj@co.monterey.ca.us

Subject: River View Las Palmas Assisted Living Senior Facility Draft Subsequent EIR

Dear Mr. Sidor:

LandWatch Monterey County has reviewed the Draft Subsequent Environmental Impact Report (Draft SEIR) for the project that is a facility on an undeveloped 15.64-acre parcel located within the Toro Area Plan and the Las Palmas Ranch Specific Plan. The proposed project includes a Specific Plan amendment, use permit, and design approval for the construction and operation of an approximately 120,000 square-foot senior assisted living facility consisting of multiple structures and associated site improvements. The facility would provide assisted living facilities for seniors requiring varying levels of assistance. LandWatch comments follow.

Project Description

The Draft SEIR does not identify or evaluate the Specific Plan amendment that is required for project approval. 4.1

Consistency with Applicable Plans

The Environmental Setting section references Table 3-1 Policy Consistency Review (Las Palmas Ranch Specific Plan, Monterey County 2010 General Plan, Toro Area Plan). However, this table is not included in the Draft SEIR. Specifically, is the project consistent with the residential unit cap of the Las Palmas Ranch Specific Plan? 4.2

Aesthetics

The Draft SEIR finds:

> The proposed project would be within the existing view shed of public areas, including from areas that offer views of scenic vistas and from viewpoints on designated and proposed scenic roadways (State Route 68, River Road and Reservation Road). The proposed project would also alter the existing, natural visual character of the project site. Although the LPRSP FEIR concluded that visual impacts on Highway 68 would be less than significant with full 4.3

> buildout of the specific plan area, including the project site, potential visual impacts of the proposed project are considered a significant adverse environmental impact....” (p. 5-30)

T-3.1 of the Toro Area Plan provides:

> Within areas designated as “visually sensitive” on the Toro Scenic Highway Corridors and Visual Sensitivity Map (Figure 16), landscaping or new development may be permitted if the development is located and designed (building design, exterior lighting, and siting) in such a manner that will enhance the scenic value of the area.

Please describe how the development will “enhance the scenic value of the area”.

Mitigation Measures reducing impacts to less that significant are proposed. Mitigation measures include:

> The site shall be landscaped and screened from view from State Route 68, River Road and Las Palmas to the extent feasible. (Emphasis added) (p. 5-29)

The EIR should identify feasible landscaping to determine if the impact to the view shed is reduced to less than significant.

Parking

The Las Palmas Ranch Specific Plan, Policy 3, requires that adequate off-street parking be provided as a means of reducing road congestion, particularly in areas where reduced road right-of-way is proposed. The Transportation and Traffic section does not address off-street parking. **4.4**

Water Supply

The Draft SEIR finds that the 11.376 acre-feet per year required for the proposed project when completed, comprises approximately .05 percent of the California Water Service Salinas District’s demand by 2020 and approximately .04 percent of the projected year 2040 demand. Because the project demand is a small percentage of overall water use from the Salinas Valley Groundwater Basin, the Draft SEIR finds that the project’s water demand is not cumulatively considerable. **4.5**

The use of a de minis percentage of water demand is not an applicable threshold of significance for a groundwater basin that is in severe overdraft now and for the foreseeable future. CEQA Guidelines §15130(a).J. finds:

> A project's incremental impact may be individually limited but cumulatively considerable when viewed together with the environmental impacts from past, present, and probable future projects.

Along with the project’s significant and unavoidable cumulative impact on Highway 68 traffic, the project should also be found to have a significant and unavoidable cumulative impact on water supply.

Thank you for the opportunity to review the Draft SEIR.

Regards,

Michael DeLapa
Executive Director

Letter 4

COMMENTER: Michael DeLapa, Executive Director, LandWatch Monterey County

DATE: March 27, 2018

Response 4.1

The commenter states that the Draft SEIR does not identify or evaluate the Specific Plan amendment required for project approval.

Section 4.0, *Project Description* (page 4-18), describes the need for a Specific Plan amendment and provides the full text of the proposed amendment. As noted therein, the project falls under the County's general definition of an assisted living facility, which is an allowed use for the project site in the General Plan and the Las Palmas Ranch Specific Plan (LPRSP). The Specific Plan amendment would serve to clarify the distinction between an assisted living facility and a residence; the distinction is noted in order to confirm that the project would not be subject to the residential limit within the Specific Plan Area. Because the project is already in conformance with the general plan and LPRSP land use designations, the Specific Plan amendment will not create any impacts and therefore does not need to be evaluated within the Draft SEIR.

Response 4.2

The commenter notes that the Draft SEIR references a table on policy consistency review, but does not include the table. The commenter asks if the project is consistent with the residential unit cap of the LPRSP.

The policy consistency table was erroneously excluded from Draft SEIR Section 3.0, *Environmental Setting.* The table has been added to Section 3.0 and is included in its entirety in Section 4, *Amendments to the Draft SEIR,* of this Final SEIR.

Regarding the residential unit cap of the LPRSP, refer to Topical Response C. As noted therein, the proposed project is not a residential use under the County code or LPRSP; as such, the residential unit limitation of 1,031 does not apply to the project.

Response 4.3

The commenter discusses the visual impacts of the project. The commenter states that the Toro Area Plan requires that new development in visually sensitive areas be located and designed to enhance the scenic value of the area. The commenter questions how the proposed project would do so. The commenter also states that the Draft SEIR should identify what landscaping would be required in order to mitigate visual impacts.

As summarized in Draft SEIR in Section 5.0, *Aesthetics*, the Toro Area Plan identifies the project site as located within an area designated as visually sensitive. The Toro Area Plan includes two policies regarding aesthetics and visual quality that are applicable to the project, as follows:

- Toro Area Plan Policy T-3.1 states that within areas designated as "visually sensitive" on the Toro Scenic Highway Corridors and Visual Sensitivity Map, landscaping or new development may be permitted if the development is located and designed (building design, exterior lighting, and siting) in such a manner that will enhance the scenic value of the area. Architectural design consistent with the rural nature of the Plan area shall be encouraged.

- Toro Area Plan Policy T-3.2. states that land use, architectural, and landscaping controls shall be applied, and sensitive site design encouraged, to preserve Toro's visually sensitive areas and scenic entrance: River Road/Highway 68 Intersection. See response to Toro Area Policy T-3.1 above.

Consistency of the proposed project with the above policies is presented in Table 3-1, which is incorporated into this Final SEIR (refer to Topical Response C and Section 4, *Amendments to the Draft SEIR*). As noted therein, the project site is located within an area designated "sensitive viewshed." The Aesthetics section of the Draft SEIR included visual simulations from SR 68 and from Reservation Road. The simulations show that although the project would be visible from these locations, the project is not located on steeper slopes and will not constitute ridgeline development. Mitigation measures ensuring the adverse impact is less than significant are: 1) requiring a landscape plan to screen the project site from State Route 68, Reservation Road, and River Road, as well as from the adjacent neighborhood and trail; 2) building colors and materials to be earth toned to blend with the existing vicinity landscape; and 3) requiring all new utility and distribution lines on the project site to be underground. Further, landscaping for the proposed project includes mostly native plants designed to preserve and enhance the natural landscape of the project site. Non-native plants included in the Landscape Plan are: magnolia tree, source magnolia, Japanese maple, western red bud, European white birch, pheasant tail grass, silver grass, Australian fuchsia, bunny tail grass, and Pacific coast iris.

For further discussion of visual impacts, refer to Topical Response F.

Response 4.4

The commenter states that the Draft SEIR does not address off-street parking.

As summarized in the Draft SEIR, Section 9.0, *Transportation & Traffic*, LPRSP Policy 3 requires adequate off-street parking to be provided as a means of reducing road congestion, particularly in areas where reduced road right-of-way is proposed. The project plans calculate the parking requirement as two stalls per unit for Casitas units, and one stall per three beds for the assisted living and memory care facilities, totaling 86 required parking spaces. The project includes a total of 106 parking spaces, thereby exceeding this requirement. These spaces are all off-street parking spaces. For more detail regarding parking, refer to the Project Description, which lists the proposed parking per facility, under the heading *Project Facilities*.

Response 4.5

The commenter states that the project would have a significant and unavoidable impact on water supply because the area's groundwater basin is in severe overdraft.

Both the Draft SEIR (Section 10.0, *Water Supply*, page 10-3) and the applicable Urban Water Management Plan acknowledge that the basin is in overdraft. However, MCWRA is a regional leader in the area for groundwater management efforts to reduce overdraft and increase the reliability of the water supply. Cal Water is supportive of these efforts and prepared to work with MCWRA and make necessary investments to augment future basin recharge. Cal Water is also taking actions to improve water reliability in the basin, including practicing and promoting conservation, implementing demand management measures to provide water reliability, and reducing water loss by system improvements. As a result, California Water Service indicated in its Urban Water Management Plan that with these and other collective efforts Cal Water is projecting that, under all hydrologic conditions, its groundwater supply for the Salinas District will fully meet future demands

projected through 2040. California Water Service has issued a "can and will-serve" letter for the project indicating it has the water supplies available to serve the project. Refer to Response 3.3 for additional information.

Based on these considerations, there is sufficient water to serve the project and impacts to water supply would be less than significant.

Letter 5

ED MERCURIO, BIOLOGICAL CONSULTANT
647 WILSON ST. SALINAS, CA 93901
(831) 206-0737
ed_mercurio@yahoo.com

April 12, 2018

RECEIVED
APR 24 2018
MONTEREY COUNTY
PLANNING DEPARTMENT

Joseph Sidor
Monterey County Planning Department
1441 Schilling Place, 2nd Floor
Salinas, CA 93901

RE: Comments on the proposed River View at Las Palmas Assisted Living Senior Facility, Salinas, California.

Dear Mr. Sidor,

I am writing on behalf of the Las Palmas No. 1 Homeowners' Association.

I have reviewed the draft EIR for the River View at Las Palmas Assisted Living Senior Facility and have the following comments.

The biological resources section of the EIR by EMC Planning Group biologists addresses the biological topics that should be covered in biological survey work on this property. However, I am not certain of the depth and timing of biological survey work that has been done.

It is stated that Regan Biological and Horticultural Consulting, LLC had surveyed the property in 2011 and 2013 and Regan is cited for 2017 on page 7-5 of the biological resources section of the EIR. I have been unable to locate another report by Regan from 2017. The 2013 update report is now 5 years old. It is also stated that EMC staff conducted a survey in 2017. The 2017 EMC survey does not appear to be available, either. It should be made public. 5.1

In the 2013 letter update to the 2011 report, it is stated that California tiger salamander *(Ambystoma californiense)* and California red-legged frog *(Rana draytonii)* are unlikely to be present on the property because there is no breeding habitat close enough, the upland habitat on the property is not suitable for them and there are no close records. Although California tiger salamanders prefer to breed in vernal pools and other ponds, they have been known to breed in quiet water pools along the margins of streams as can be found in the nearby Salinas River. California red-legged frogs prefer to breed in quieter waters of streams. The Salinas River is approximately one-half mile from the property, within the maximum known dispersal distance to upland habitat for these amphibians. These amphibians spend their time in upland habitats underground and their preferred upland residences are in burrows of California ground squirrels, which are listed as being observed on the property. Lastly, there is a record of an observation of a California tiger salamander on the project property by Susan Hurst in 2005. In the light of this evidence, I believe that the potential for these amphibians to be present on the property is high enough to warrant further survey work on investigating the possibility of their presence. 5.2

It is stated that EMC Planning Group Biologists Andrea Edwards and Jessica Wheeler performed a reconnaissance field survey at the site on February 14, 2017 to document existing plant communities and wildlife habitats, and to evaluate the potential for special-status biological resources to occur on the site. Where is their complete biological report for this survey giving the details of how the survey was done and their observations, including a list of all plants and wildlife observed, available? Also, Andrea Edwards and Jessica Wheeler do not appear on the Monterey County Planning Department's List of Approved Consultants. What are their credentials? 5.3

Please contact me if you have any questions.

Best regards,

Ed Mercurio, Biological Consultant

Letter 5

COMMENTER: Ed Mercurio, Biological Consultant on behalf of the Las Palmas No. 1 Homeowners Association (LPHOA)

DATE: April 12, 2018

Response 5.1

The commenter questions the depth and timing of the biological survey work done for the proposed project. The commenter notes that 2017 surveys are mentioned in the Draft SEIR, and requests public access to the cited documents.

The exclusion of the Botanical Survey reports prepared by Regan Biological and Horticultural Consulting in 2017 was an oversight; the report is attached to this Final SEIR as Appendix H.

The reconnaissance level survey performed by EMC biologists was intended to identify and map vegetation communities and document general existing conditions on-site to inform the discussion in the Draft SEIR; however, the information was provided only in the Draft SEIR (i.e. no stand-alone report was prepared). The results of the reconnaissance survey are presented in Section 7.1 (page 7-1) of the Draft SEIR.

Because the findings of the survey were presented in the Draft SEIR, inclusion of the botanical survey results as Appendix H to the Final SEIR does not represent significant new information; rather, the survey report merely clarifies the source of information presented in the Draft SEIR.

Response 5.2

The commenter states that further survey work should be performed investigating the presence of special status amphibian species (California tiger salamander [CTS] and California red-legged frog [CRLF]) on the project site. The commenter provides habitat descriptions that support this opinion. The commenter notes a reported California tiger salamander on the project site in 2005. The incidental observation of a CTS by a private citizen is undocumented and cannot be verified; however, for clarification, the following information is provided to support the assessment of CTS and CRLF habitat at the project site. The analysis presented below is based on a desktop review of current and historical aerial photographs of the site (Google Earth 2018), CDFW Biogeographic Information and Observation System (BIOS; CDFW 2019), the technical reports provided in the Draft SEIR, and other available background information. Biologists also conducted a reconnaissance site visit on June 14, 2019, to confirm existing conditions.

California Tiger Salamander

The following revisions have been made on page 7-11, Table 7.2 Special-Status Wildlife Species with Potential to Occur in Vicinity, column 4 (Potential to Occur on Project Site), row 7 California tiger salamander of the Draft SEIR:

> ~~Not expected. No suitable habitat found on the site.~~Low. High quality, but mostly isolated habitat is present on site, and suitable breeding habitat is present within 1.24 miles of project site.

The following text replaces the first paragraph on page 7-15 of the Draft SEIR:

~~The project site does not contain habitat suitable for California tiger salamander breeding. CDFW records indicate that there are no known occurrences of California tiger salamander within 2.5 miles of the site. There are no ponds or wetted areas on the site. The ditch that runs along the eastern edge of the property is outside the project boundary and did not support standing water at the time of the survey, even after extremely heavy rains this season (winter 2015-2016). The ditch also appears to be sprayed with herbicides, as vegetation observed in this area was yellow, in contrast to surrounding vegetation. There were very few California ground squirrel burrows observed in the grassland areas, and California tiger salamander is not expected to utilize the site for upland refuge habitat.~~

The site is located approximately two miles from the closest known California Natural Diversity Database (CNDDB) occurrence of CTS at Toro Regional Park. The site is also within 1.24 miles (i.e., the known CTS dispersal distance) of stock ponds, detention basins, the Salinas River, and other wetlands visible on aerial imagery that represent areas with suitable breeding habitat. Based on a site visit and review of aerial imagery, the habitat on-site does not include suitable breeding habitat but may provide upland habitat in ground squirrel and small mammal burrows. Connectivity for movement between known populations and potential breeding habitat in the area and the project site itself is feasible where natural habitat or landscaped areas allow for undisrupted movement. A potentially suitable stock pond was located approximately 0.33 mile west of the site but was converted to agriculture between late 2017 and early 2018. This pond was evaluated for the adjacent Ferrini Ranch Project and was determined not to provide suitable breeding habitat due to an insufficient hydro-period and shallow basin (PMC 2014). However, the assessment in the Ferrini Ranch Subdivision EIR was made during a period of regional drought. A review of Google Earth imagery from 2016 showed that the pond held water through April 2016, indicating a sufficient hydro-period to support breeding. Higher quality and more easily accessible habitat is present outside of the project site. CTS cannot be completely excluded from having a potential to occur at the project site; however, the site is bordered by development and agriculture on three sides, and the potential for CTS to occur on site is low.

California Red-legged Frog

The conclusion of the Draft SEIR that CRLF are not expected to occur is correct; however, for clarity the following language replaces the third paragraph on page 7-15:

~~The project site does not contain habitat suitable for California red-legged frog breeding. CDFW records indicate that there are no known occurrences of California red-legged frog within 2.5 miles of the site. As described above, there are no ponds or wetted areas on the site. There are very few California ground squirrel burrows observed in the grassland areas, and California red-legged frog is not expected to utilize the site for upland refuge habitat.~~

The closest reported occurrence of CRLF is approximately 5.1 miles to the south of the site, on the south side of Toro Regional Park. This occurrence was reported from a stock pond along Corral Del Cielo Road. Other occurrences in the vicinity are similarly from stock ponds. No creeks provide connectivity between the project site and any known occupied habitat. As such, it is unlikely that CRLF would disperse to the site from known stock pond occurrences in the south, and protocol level surveys of Toro Creek to the south performed for the Ferrini Ranch project were negative. CRLF have also been reported from the Salinas River approximately 8.6 miles downstream of the site, where adults and juveniles were observed. American bullfrog and non-native predatory fish are also known to occur in the Salinas River and reduce the habitat

suitability in that water body for CRLF. Agricultural fields and busy roads lay between the river and the site posing significant biogeographic barriers and reducing the likelihood for dispersal from distant known occurrences to the project site. Therefore, CRLF are not expected to occur on-site.

The following language is added to the Draft SEIR on page 7-28 as follows:

IMPACT Potential Loss or Disturbance of California Tiger Salamander

If California tiger salamander is present on the project site, construction activities could result in the loss or disturbance of individual animals. This would be a significant adverse environmental impact. Implementation of the following mitigation measure would reduce the potential impact to a less than significant level.

BIO– 6 California Tiger Salamander Surveys, Avoidance and Minimization

Prior to the start of construction, a qualified CTS biologist shall conduct a preconstruction survey for CTS. The survey shall include a transect survey over the entire project disturbance footprint (including access and staging areas), and scoping of burrows for CTS occupancy. If CTS are documented on the surface or in burrows, no work can be conducted until the individuals leave the site of their own accord. If no CTS are found, the biologist shall collapse all small mammal burrows onsite within the disturbance footprint. After all burrows have been collapsed, a silt fence shall immediately be installed around the edges of the work area to the existing road. This fencing shall be buried to at least three inches. No equipment or disturbance shall be allowed outside of the silt fence, and fencing shall remain in place until the project is complete. If a California tiger salamander is observed at any time during burrow excavation or construction, all work shall cease, and the applicant shall contact the USFWS for guidance before commencing project activities.

The above text clarifies the potential for California tiger salamander and California red-legged frog to occur on site and be affected by the proposed project. With Mitigation Measure BIO-6, a measure consistent the other measures to protect biological resources (i.e., pre-activity surveys and subsequent avoidance and protections), the project would avoid impacts to CTS. Therefore, the information provided here does not significantly change the conclusions of the Draft SEIR or represent substantial new information.

Response 5.3

The commenter requests public access to the plant community and wildlife habitat surveys performed for the project. The commenter notes that surveys were performed by consultants not listed on the County Planning Department's List of Approved Consultants, and requests information regarding their credentials.

The biologists that performed the reconnaissance field survey described in Section 7.0, *Biological Resources,* are EMC Planning Group staff. EMC Planning Group is included on the County Planning Department's list of approved biology consultants.

Letter 6

April 16, 2018

Joseph (Joe) Sidor, Associate Planner
Monterey County Resource Management Agency – Planning
1441 Schilling Place, 2nd Floor
Salinas, CA 93901
sidorj@co.monterey.ca.us

Subject: River View Las Palmas Assisted Living Senior Facility Draft Subsequent EIR

Dear Mr. Sidor:

The following comments supplement LandWatch's March 27, 2018 comments.

The project is inconsistent with General Plan policies that require a Development Evaluation System (DES).

The project is subject to the DES that applies to projects of five subdivisions or more, or projects with equivalent impacts (2010 Monterey County General Plan, LU 2-19). In earlier drafts of the DES, county staff defined "equivalency:"

"Equivalency" is when a project generates one or more of the following, based on multiplying standard outputs generated from a single family residence by 5:

- Water: 1.55 AF/year
- Wastewater: 1.55 AF/year
- Traffic: 49.5 daily trips or 18,067.5 trips per year

6.1

The project exceeds the water trigger at 11.36 AFY and the wastewater trigger at 13.53 AFY (12,070 gpd) and is therefore subject to the DES. Consistency with the DES should be addressed in the FEIR.

The County has not yet implemented General Plan Policy LU 1.19, which mandates preparation of a Development Evaluation System ("DES") "to provide a systematic, consistent, predictable, and quantitative method for decision-makers to evaluate developments of five or more lots or units and developments of equivalent or greater traffic, water, or wastewater intensity." The DES applies to this Project because it is not within a Community Area, Rural Center, of Affordable Housing Overlay district.

General Plan Policy LU 1.19 mandates that the County establish the DES "within 12 months of adopting this General Plan," i.e., by October 26, 2011. The DES is now *seven years* overdue. Planning staff did not bring the first workshop proposal for the DES to the Planning Commission until July 31, 2013. The Planning Commission did not review the proposal in detail. Instead,

based on a discussion led by Commissioners Diehl, Vandevere, and Brown, the Commission provided direction to staff to return with specific comments to staff regarding the scope and content of the DES.

The DES is a mandatory requirement of the General Plan and a critical constraint on sprawl development. Projects subject to the DES cannot be approved until the County establishes the objective, systematic scoring system that Policy LU 1.19 requires. Accordingly, the County should not approve this Project until it implements its General Plan by establishing the DES and evaluating this Project with the DES.

Relevant provisions of the DES

The DES must be an objective and predictable scoring system to determine which projects may be approved. Thus, it must be "a pass-fail system and shall include a mechanism to quantitatively evaluate development in light of the policies of the General Plan and the implementing regulations, resources and infrastructure, and the overall quality of the development."

The DES is required to include evaluation criteria, including but not limited to the following:

a. Site Suitability
b. Infrastructure
c. Resource Management
d. Proximity to a City, Community Area, or Rural Center
e. Mix/Balance of uses including Affordable Housing consistent with the County Affordable/Workforce Housing Incentive Program adopted pursuant to the Monterey County Housing Element
f. Environmental Impacts and Potential Mitigation
g. Proximity to multiple modes of transportation
h. Jobs-Housing balance within the community and between the community and surrounding areas
i. Minimum passing score

6.1

Since the DES must be objective, quantitative, and predictable, and must create a pass-fail system with a minimum score, the County must devise a scoring system that implements at least the criteria enumerated in LU Policy 1.19.

The purpose of the DES is to avoid sprawl development and encourage development that meets General Plan aspirational goals.

LU 1.19 is an important form of mitigation to avoid impacts associated with sprawl development. The announced purpose of LU 1.19 was also to ensure that the Community Areas and Rural Centers remain the priority areas for growth and that only 20% of future growth occurs outside these designated growth areas. See, e.g., 2010 General Plan FEIR, Master Response 2.1.2.

When the Planning Commission reviewed and rejected staff's initial version of the DES, they provided essential guidance that illuminated the purpose of the DES.

- The DES is not a device for determining whether a project is consistent with the General Plan. If a project is not consistent with the General Plan, it should not even be reviewed under the DES.
- The DES must be designed to screen out all but the exceptional projects that justify departing from the goal of focusing growth in Community Areas and Rural Centers.
- The DES must be designed to implement the General Plan goal to limit growth outside these areas 20% of overall growth.
- The DES must provide a pass/fail system, with a minimum passing score.
- The DES must provide objective criteria.
- Projects should be rewarded for meeting the General Plan's aspirational goals and exceeding its minimum standards.

The County should move to establish the DES promptly, and it should not deem applications complete or approve projects subject to the DES until it establishes the DES. 6.1

The County has a mandatory duty to establish a DES, and to do so timely, since LU Policy 1.19 states that it "shall be established within 12 months." Accordingly LandWatch asks that the County ensure that implementation of LU 1.19 be made a priority.

LU Policy 1.19 provides that the development projects subject to its provisions must meet the minimum passing score of a DES. Approval of such projects without scoring them through a DES, which must be established as a "systematic, consistent, predictable, and quantitative method for decision-makers to evaluate developments," would be inconsistent with the General Plan.

In short, establishment of the DES is an essential prerequisite to approving projects subject to LU Policy 1.19. Until the County establishes a DES, approving a residential project of five or more units, or a development of equivalent traffic, water or wastewater intensity, outside a Community Area, Rural Center, or Affordable Housing overlay would be *ultra vires* because the County is powerless to issue permits that are inconsistent with the General Plan.

Until the DES is established, LandWatch asks that the County refrain from deeming any development application for a project subject to LU 1.19 complete or from approving any such project.

Regards,

Michael DeLapa
Executive Director

Letter 6

COMMENTER: Michael DeLapa, Executive Director, LandWatch Monterey County

DATE: April 16, 2018

Response 6.1

The commenter states that the project is inconsistent with General Plan Policy LU-1.19 that requires a Development Evaluation System (DES). The commenter states that until the DES is established Land Watch asks the County to refrain from deeming any development application for a project subject to LU-1.19 complete or from approving any such project. The commenter states that the County has not yet implemented General Plan Policy LU 1.19, which mandates preparation of a DES for certain projects. The commenter states that the County is obligated to establish a DES and should refrain from approving projects that would be subject to a DES until it is established.

The County has utilized an interim system for several recent projects. Utilizing this approach, the following discussion has been added to Table 3-1, Section 3.0, *Environmental Setting*, of the Draft SEIR. Refer also to Topical Response C for a discussion of Table 3-1 and Section 4, *Amendments to the Draft SEIR,* for the full table.

Monterey County General Plan Policy	Consistency Discussion
Land Use Element	
LU-1.19: Community Areas, Rural Centers and Affordable Housing Overlay districts are the top priority for development in the unincorporated areas of the County. Outside of those areas, a Development Evaluation System shall be established to provide a systematic, consistent, predictable, and quantitative method for decision-makers to evaluate developments of five or more lots or units and developments of equivalent or greater traffic, water, or wastewater intensity. The system shall be a pass-fail system and shall include a mechanism to quantitatively evaluate development in light of the policies of the General Plan and the implementing regulations, resources and infrastructure, and the overall quality of the development. Evaluation criteria shall include but are not limited to: a. Site Suitability b. Infrastructure c. Resource Management d. Proximity to a City, Community Area, or Rural Center e. Mix/Balance of uses including Affordable Housing consistent with the County Affordable/Workforce Housing Incentive Program adopted pursuant to the Monterey County Housing Element f. Environmental Impacts and Potential Mitigation g. Proximity to multiple modes of transportation h. Jobs-Housing balance within the community and between the community and surrounding areas i. Minimum passing score Residential development shall incorporate the following minimum requirements for developments in Rural Centers prior to the preparation of an Infrastructure and	**Consistent**. The project site is not within a Community Area, Rural Center, or Affordable Housing Overlay District. Thus, the project should be analyzed pursuant to the Development Evaluation System (DES) required by this policy. Pending adoption of a detailed program implementing the DES, the County has been implementing the DES through application of the criteria in LU-1.19. Accordingly, an interim analysis has been completed for this project based on the Policy LU 1.19 criteria. The objective of the DES is to strongly discourage or avoid "leap frog" development not proximate to urbanized or community areas where public services and facilities exist. The project meets this objective of the DES. This proposed project is infill in nature and is the last developable site in the LPRSP area, near existing communities, major roadways, and services. The proposed project is consistent with the majority of the specified DES criteria, if the criteria are deemed to apply to an infill location such as the subject site. The affordable housing and jobs-housing balance criteria do not apply because the proposed project is not residential. In terms of "site suitability," "proximity to cities and communities," and "multiple modes of transportation," the project's location near an existing residential development makes the site suitable for the assisted living use proposed. The proposed site is less than 2 miles from the River Road Rural Center. The site's location provides efficient access to SR 68 via River Road, the

Monterey County General Plan Policy	Consistency Discussion
Financing Study, or outside of a Community Area or Rural Center: 1) 35% affordable/Workforce housing (25% inclusionary; 10% Workforce) for projects of five or more units to be considered. 2) If the project is designed with at least 15% farmworker inclusionary housing, the minimum requirement may be reduced to 30% total. This Development Evaluation System shall be established within 12 months of adopting this General Plan.	major transportation corridor to the west of the site. Residents of the proposed project are not expected to need significant services outside of those provided at the assisted care facility, but the nearby Monterey Peninsula communities of Spreckels, Creekside, and Salinas are within short travel distance of the site and offer a wide range of commercial and personal services and medical care facilities if desired. The project will also include walking paths, and the applicants have proposed shuttle services for residents to access areas on the Monterey Peninsula and Salinas, including regular shuttle service for employees to transportation hubs nearby, as not all residents would have access to personal vehicles. Regarding "infrastructure and services," the site has received a "can and will serve" letter from Cal Water and, as discussed above in the LPRSP analysis above under "Public Facilities and Services – Water", total water use at Las Palmas is expected to be about 193.4 AFY, significantly less than the 599 AFY that was allowed by the adopted specific plan. Additional infrastructure is existing or will be built concurrently with the project so the project site would be adequately served. Finally, regarding "resource management" and "environmental impacts and potential mitigations," the project would result in significant but mitigatable impacts on special status animal species. Construction of the proposed project could directly impact American badger, Monterey dusky-footed woodrat, western red bat, burrowing owl or nesting birds. This impact is also considered significant but mitigatable. In summary, when considered in relation to the DES criteria specified in General Plan Policy LU-1.19, the project is, overall, consistent with LU-1.19.

TJKM

Letter 7

April 23, 2018

Joseph (Joe) Sidor, Associate Planner
Monterey County
Resource Management Agency – Planning
1441 Schilling Place, 2ND Floor
Salinas, CA 93901

Re: Comments on DSEIR River View at Las Palmas Assisted Living Senior Facility

Dear Mr. Sidor:

TJKM Transportation Consultants appreciates this opportunity to provide our comments on the subject document. We are providing these comments on behalf of the Las Palmas Homeowners Association No 1. Our comments are as follows:

Traffic on SR 68

Portions of State Route 68 operate at LOS F. It appears that various large projects have been approved recently by the County with significant environmental impacts being dealt with by establishing overriding considerations. The County and other agencies could keep adding in the traffic impacts of these projects, each of which further worsens the existing peak hour congestion. Roundabouts have been discussed for installation at various locations; however, there is no indication that these roundabouts will actually be constructed nor that they will actually reduce daily congestion and delays along the SR 68 corridor. 7.1

Trip Generation

We question the applicability of trip rates used for this project, particularly for the casitas where the residents can have their own cars, and commercial operations at the facility. There is concern that the rates used for the casitas units may not accurately reflect traffic from employed residents, visitor travel, caregiver trips and even medical visits. Can the applicant demonstrate that the ITE rates utilized apply to this project? The facility will also have a host of other commercial operations, including full food service and other resident services. Traffic to the facility will not be just cars and shuttle vehicles, but larger delivery trucks for the commercial needs, along with medical response vehicles. The impact of these vehicles does not appear to be addressed. 7.2

River Road Access Details

The EIR provides no significant review of existing Las Palmas entry "gate" operations and conditions and how these may be affected by the project. In order to provide enhanced security, the home owners have placed a guard house on Las Palmas Road (the main entrance to the subdivision) immediately west of River Road, at the entrance to the subdivision and have retained security personnel to monitor and regulate incoming traffic. But even under current conditions the volume of inbound traffic during peak periods has caused the process to be relaxed (no guard check of entering vehicles) in these peaks to minimize congestion at the entrance and to avoid backups into the River Road signalized intersection. The residents have been able to live with this approach since most of the inbound traffic during busy periods are homeowners and this is the most practical solution to maintain security. 7.3

However, with the new development there will be a clear need to screen all incoming traffic. To accomplish this Las Palmas Road would need to be two long entrance lanes, one for those to be checked by the guard (visitors, delivery vehicles, etc.) and one for residents/employees with badges or vehicle stickers/placards. Entry gates would probably need to be added. The logistics of this are very awkward because of space limitations at the entrance. The entrance lanes would likely need to extend all the way to River Run Road to accommodate the volume of traffic. This would effectively cut off the existing left turn lane and movement into Winding Creek Road, which is very close to the entrance. This would create circulation issues for those residents who live along Winding Creek Road, who under the revision described above would not be able to make a left turn into their street.

The overall solution requires an additional westbound entrance lane on Las Palmas Road between River Road and River Run Road, a distance of about 400 feet. In addition, an entrance gate and entry system would need to be installed along with likely increased security personnel hours at the entrance.

This is a major concern to the residents. The EIR should investigate this issue in detail and provide a plan to provide full security and safety to existing residents and to occupants of the new development.

Woodridge Court

There are no details on the Woodridge Court access to the new project, other than it will probably be 28 feet wide. How steep is it? Since this is the only entrance to the new development, design details are important. We were unable to locate a site plan within the EIR that contains planned details of the Woodridge Court access. 7.4

Single Access Point

It is noted that there is only a single access to the site, using the aforementioned Woodridge Court. It appears that due to the property ownerships involved, there are no possibilities of a second access point or even an emergency access point. A secondary or emergency access point is a standard requirement in all developments. In a fire, or any other emergency, all 142 residents of the site (42 in casitas, 52 in assisted living and 48 in memory care) (See pages 4-5 and 4-6) would have to be evacuated out one route funneled through the Las Palmas subdivision. Any emergency vehicles would need to use the same route. The 142 residents include ambulatory, non-ambulatory, and some with diminished mental capacity making their evacuation even more challenging. Evacuating staff members would use the same route. This is a significant issue which has not been addressed. 7.5

Emergency Calls to Site

Emergency calls to the site have not been addressed. The EIR should disclose how emergency calls to the site, which could provide disturbances to existing residents, perhaps frequently, will be handled. Even without sirens, these vehicles are loud Potential day time and night time emergency vehicle visits, should be addressed. 7.6

Private Street Pavement Impacts by Construction Trucks

The EIR describes a two-year construction period and an import requirement of 34,500 cubic yards of fill in addition to the normal heavy construction traffic. For this amount of fill, this would generate nearly 3,000 loaded 12-yard pickup trucks driving on River Road, Las Palmas Road, River Run Road and Woodridge Road, and an equal number of returning empty dump trucks. The construction truck traffic is likely to cause damage to these private streets which have not been designed to accommodate this type and volume of construction traffic. The damage would include heavy wear and tear on the asphalt concrete pavement. In addition, three intersections along the route to the new development have hand-placed concrete brick pavement, which typically rests on a sand base. Regardless of the base, the brick pavement is unlikely to withstand the impacts of 3,000 fully loaded dump trucks. Typical damage is broken or displaced bricks. 7.7

The replacement or repair of damaged asphalt concrete and brick pavement sections needs to be addressed in the DEIR.

Mitigation Measures

Figure 9-4 on DEIR page 9-19 shows level of service results for three study intersections for three scenarios. This table shows that under cumulative plus project conditions the Highway 68 EB and WB ramp conditions at Reservation Road/River Road are at LOS D, exceeding the Monterey County standards. However, there is no DEIR text dealing with 7.8

cumulative traffic impacts and mitigation requirements. In the project traffic impact study included as Appendix D of the DEIR, the impacts at these two intersections are described along with mitigation measures. The DEIR text indicates that the project would be required to pay regional impact fees, although such a payment is not included as a mitigation requirement. In addition to no description of cumulative impacts in the DEIR text, it is not clear which impacts the payment of regional fees is intended to mitigate. A description of cumulative impacts and more details on resolution of these impacts should be added to the DEIR.

Applicant Mitigation Measures

The applicant proposes off-peak employee shifts and the use of shuttle buses for both residents and for employees. The downside of these activities are an increased amount of early morning or late night travel through the Las Palmas neighborhood, and frequent shuttle bus travel through the same neighborhoods. The DEIR should address the impacts of these mitigation measures on the Las Palmas neighborhood. 7.9

Please contact me if there are questions on these matters.

Very truly yours,

Chris D. Kinzel

Chris D. Kinzel, P.E.
Vice President

Cc: Christine G. Kemp

Letter 7

COMMENTER: Chris D. Kinzel, P.E., Vice President, TJKM Transportation Consultants

DATE: April 23, 2018

Response 7.1

The commenter notes that portions of State Route 68 operate at Level of Service F, and states that the County has recently approved projects by establishing overriding considerations.

The Draft SEIR acknowledges that vehicle trips generated by the project would contribute to existing LOS F conditions on the segment of State Route 68 from Toro Park to State Route 218. As shown in Figure 9-2 in Draft SEIR Section 9.0, *Transportation & Traffic*, it is estimated that the project would add less than five peak-hour trips to this segment of State Route 68. Although this contribution to traffic on State Route 68 would be minimal relative to existing traffic conditions, the Draft SEIR notes that Caltrans conditions a single additional peak-hour trip on highways with existing LOS F conditions to be a significant impact. Based on this conservative threshold, the Draft SEIR finds that the project would have a significant impact on traffic conditions on State Route 68. The applicant would be required to pay a regional traffic impact fee toward future improvements to State Route 68. However, because the applicant would not directly implement any improvements to this highway to offset the project's contribution to LOS F conditions, and it is unknown if future improvements using regional traffic impact fees would improve the level of service, this impact would be significant and unavoidable.

Pursuant to Section 15093 of the State CEQA Guidelines, the lead agency may provide a statement of overriding considerations for approval of a project that would have a significant and unavoidable impact, determining the project's benefits would outweigh its environmental impacts. Consistent with the CEQA Guidelines, the County would include a statement of overriding considerations in its CEQA Findings for approval of the project. This statement would acknowledge the project's significant and unavoidable impacts while determining that they are outweighed by its overall benefits.

Response 7.2

The commenter asserts that the trip generation rates used in the Draft SEIR's traffic analysis do not adequately account for the use of cars by residents of the proposed casitas, visitor travel, caregiver trips, emergency medical trips, and commercial operations. The commenter requests more information supporting the traffic analysis.

As shown in Figure 9-2 in Draft SEIR Section 9.0, *Transportation & Traffic*, the traffic analysis applies the Institute of Transportation Engineers' (ITE) trip generation rates for the following land uses: Senior Housing – Detached (ITE land use code 251), Senior Housing – Attached (ITE 252), Assisted Living (ITE 254), and Nursing Home (ITE 620). The ITE land use codes applied to the project are representative of the full range of land uses associated with the proposed senior assisted living facility. This includes the semi-independent casitas units, the assisted living facility, and the memory care facility. For this reason, Hatch Mott MacDonald's *Riverview at Las Palmas Trip Generation Study* (December 2013) found that these ITE land use codes were appropriate for the project, because they were most representative of the activity levels at the project's facilities, including medical-related traffic and car use associated with the semi-independent living at the casitas units.

In general, the ITE's trip generation rates for individual land use codes are based on traffic studies performed by qualified transportation engineers of representative examples of each land use. These traffic studies count any vehicle trips associated with the studied land uses, including trips that are ancillary to the land use. The trip generation rates applied to the project therefore incorporate ancillary trips that are typical of senior assisted living facilities, such as resident trips, visitor travel, truck trips to supply food service and commercial operations, and medical trips. This would include trips generated by the proposed casitas, where semi-independent residents could have their own cars. The commenter has not provided specific evidence that the ITE land use codes applied to the project exclude such vehicle trips. Therefore, the trip generation rates used in the Draft SEIR's traffic analysis are appropriate.

Response 7.3

The commenter asserts that the Draft SEIR lacks an adequate analysis of queuing of vehicles at the entrance gate to the Las Palmas Ranch Phase #1 Subdivision (Subdivision). Security guards do not currently check inbound vehicles at the gate during peak hours, the commenter states, in order to minimize queuing. The commenter contends that most inbound vehicles are driven by homeowners, which enables this relaxation of normal security protocol. However, the commenter states that the project would generate vehicle trips that require stricter screening, such as visitors and deliveries, resulting in the need for an additional westbound entrance lane at the gate. The commenter asserts that an extended entrance to the gate would obstruct vehicles from turning left onto Winding Creek Road.

Please refer to Topical Response D for a discussion of queuing concerns at the Subdivision's entry gate. As noted therein, the project would increase inbound traffic at the gate by an estimated 16 percent. However, this increase in traffic would not substantially increase queuing. An additional westbound entrance lane at the gate would not be needed, and queuing vehicles would not obstruct vehicles from turning left onto Winding Creek Road. Therefore, the project would have a less than significant impact on traffic circulation related to queuing.

Response 7.4

The commenter requests additional information on the Woodridge Court access point to the project site, including the steepness of grade.

Please refer to Topical Response D. As noted therein, the proposed project would involve extending Woodridge Court at a grade of approximately 15 percent to provide vehicular access to the project site. This grade is within the County's requirements for the LPRSP and for the County in general.

Response 7.5

The commenter notes that Woodridge Court is the only access point to the project site. The commenter notes that a secondary or emergency access point is a standard requirement in all developments, and that the population served by an assisted living senior facility would present special challenges in the event of an emergency evacuation.

Please refer to Topical Response D. As noted therein, secondary access between River Road and the project site during emergency evacuations would be available through the lawn area between Country Park Road and Woodridge Court. However, secondary access would not be provided on Woodridge Court between Country Park Road and the first internal parking lot aisle. Mitigation Measure T-2 would be required to install improvements that improve access to the lawn area and

Woodridge Court. With implementation of this measure, the project would have a less than significant impact on emergency access.

Response 7.6

The commenter states that the Draft SEIR does not address emergency vehicle trips to the site, including noise disturbances.

The traffic analysis utilizes ITE trip generation rates applicable to the project type, which projects traffic based on the type and size of the proposed facilities. In addition, as noted in Topical Response H, sirens from emergency vehicles would result in a short-term spike in ambient noise levels at nearby residences. However, there is an agreement in place that the Subdivision is a "no-siren zone." Additionally , the County Code exempts "emergency vehicles being operated by authorized personnel" from noise regulation. Therefore, emergency vehicles would have a less than significant impact on ambient noise.

Response 7.7

The commenter states that construction truck traffic for the project is likely to damage the area's private streets, including hand-placed concrete bricks at three intersections on the route to the project site. The commenter asserts that the Draft SEIR should address repair or replacement of damaged roads.

Please refer to Topical Response D. As noted therein, truck trips routed through the Subdivision during construction could contribute to deterioration of private residential streets maintained through homeowners association fees. However, as a standard grading and building permit condition, the County would require that the project applicant be responsible for repairing any damage to existing infrastructure during the temporary construction activities. Adherence to this condition of approval would prevent long-term deterioration of the circulation system from construction activity.

Response 7.8

The commenter states that the Draft SEIR does not address cumulative traffic impacts and mitigation measures. The commenter requests more information on cumulative traffic impacts, mitigation measures, and fees.

Page 9-24 of Draft SEIR Section 9.0, *Transportation & Traffic*, has been amended as follows in the Final SEIR to summarize the cumulative traffic impacts and applicable mitigation that were already described in the traffic study (Appendix D to the Draft SEIR):

> As shown in Figure 9-4, the Cumulative + Project traffic scenario would degrade traffic conditions at two signalized intersections to below the County's threshold of LOS C. In this traffic scenario, the Reservation Road/State Route 68 westbound ramps intersection would operate at LOS D during PM peak hours, as would the River Road/State Route 68 eastbound ramps during AM peak hours. Under existing conditions, these intersections operate at acceptable LOS C conditions. To offset a contribution to unacceptable cumulative traffic conditions at these intersections, the applicant would be required to pay impact fees toward future traffic improvements.
>
> The Transportation Agency for Monterey County (TAMC) and its member jurisdictions have adopted a county-wide, regional development impact fee to cover the costs for studies and

construction of many roadway improvements throughout Monterey County. This impact fee, which went into effect on August 27, 2008, is applied to new development within Monterey County. The governing document for the fee is the Regional Impact Fee Nexus Study Update (March 26, 2008) prepared by Kimley-Horn Associates, Inc. The Regional Impact Fee Nexus Study Update was updated in October 2018 by Wood Rodgers. Payment of the TAMC fee would satisfy the project's fair-share contribution to cumulative impact mitigation throughout the regional highway system, even for locations where an improvement has not been included in the fee program. In addition, the applicant would be required to pay a County fee for traffic impacts, which could include a pro-rata share of improvements at the River Road-Reservation Road /Highway 68 ramps intersections.

By paying required TAMC and County traffic impact fees, the project would not considerably contribute to a significant cumulative traffic impact.

Response 7.9

The commenter notes that the project applicant proposes off-peak employee shifts and the use of shuttle buses as means to reduce traffic impacts. The commenter states that these measures would result in increased early morning or late-night travel, including shuttle bus trips, through the Las Palmas neighborhood, and that the Draft SEIR should address these impacts.

Early morning or late-night trips to and from the project site would occur outside of peak hours and therefore would not result in traffic congestion on neighborhood streets or at the entrance gate to the Las Palmas neighborhood. For further discussion of impacts from traffic noise, please refer to Topical Response H.

NOLAND HAMERLY ETIENNE & HOSS

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Letter 8

April 24, 2018

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BY HAND DELIVERY

Joseph Sidor, Associate Planner
Monterey County Resource Agency – Planning
1441 Schilling Place, 2nd Floor
Salinas, CA 93901

Re: Comments on Draft EIR for RiverView at Las Palmas Assisted Living Senior Facility

Dear Mr. Sidor:

I am writing on behalf of the Las Palmas Ranch Master Association No. 1 ("LPHOA") to provide comments on the Draft EIR (DEIR) for the RiverView at Las Palmas Assisted Living Senior Facility (Project).

The property, commonly referred to as Parcel Q, on which the Project is proposed, is part of the Amended Map of the Las Palmas Ranch Corey House Area/Unit 1 Tract Map recorded on June 15, 1989 at Vol. 16 C &T Pg. 70, Official Records of Monterey County ("Parcel Q" or the "Property"). 8.1

The Property is not part of the LPHOA, but rather adjacent to that portion of the Las Palmas Ranch No. 1 Subdivision[1] which is governed by, and included within, the LPHOA ("Subdivision").

The Project's sole means of access is through the Subdivision (over Las Palmas Road, River Run and Woodridge Court), which roads are all privately owned and maintained by the LPHOA. 8.2

The Project will create significant unmitigated traffic impacts to the Subdivision roads. The three proposed traffic mitigations do not adequately address the impacts to the Subdivision roads which will occur with this Project.

The Project is inconsistent with the rural residential nature of the Subdivision and the overall Specific Plan for the Las Palmas project, which Specific Plan sought to cluster 8.3

[1] The Las Palmas Ranch No. 1 Subdivision is the first phase of the entire Las Palmas project buildout.

the residential units in specific locations with low visual impacts and retain the remainder of the Las Palmas planning area, including the frontal slopes and ridgelines in open space. Introducing a large senior residential care facility on this visually prominent site was never contemplated in the Las Palmas Specific Plan, which Plan has now been built out, and should be followed.

The Project will create significant visual and aesthetic impacts when viewed from the Subdivision, River Road, and Highway 68. At 90,000 – 110,500 sq. ft., with large 2-story and 3-story elements, and sitting on a prominent ridge above the Subdivision, River Road and Highway 68, a State Scenic Highway, the Project will be visible. "Landscape Screening" cannot adequately mitigate the significant visual impacts that will occur with the Project. The large tall buildings will be there, and they will be visible. 8.4

The Project will create a significant night light impact to the Subdivision, and the entire surrounding area, with the Project perched on the ridge above the Subdivision. A "Lighting Plan" cannot adequately mitigate the significant impact and disruption to the night light that will occur with the Project. The light will be there, and it will be visible.

The Project has the potential to create significant erosion and drainage issues for the Subdivision, with erosion already occurring on the uphill slope adjacent to the Country Park Road area of the Subdivision. 8.5

2.0 Project Summary

The Project Summary mischaracterizes the Project and is inaccurate.

Page 2-1 – The Project is not consistent with the Las Palmas Specific Plan (LPSP). The Las Palmas Specific Plan did not allocate housing or development for the project site. Figure D in the LP Specific Plan does not include Parcel Q in the developable parcels, nor is Parcel Q shown as a developable area on the LPSP Figure H. The maximum build out of Las Palmas planned community is 1031 homes as shown on Figures D and E. (See LPSP Policy 5, Page II-4). 8.6

Page 2-2 – The Project site was not given a residential land use designation in the LP Specific Plan. It was shown as an undevelopable parcel. (See LPSP Figure H). The LP Specific Plan expressly "prohibited building" in the areas as delineated on Figures H and K, in which the Project is located. (See LPSP Policy 2, Page II-12).

3.0 Environmental Setting

The description of the Environmental Setting mischaracterizes the Project setting and is inaccurate. 8.7

3.2 – Baseline - The Project site was not proposed for development in the Las Palmas Specific Plan. The Las Palmas Specific Plan did not allocate housing or development for the project site. Figure D of the LPSP does not include Parcel Q in the developable parcels, nor is Parcel Q shown as a developable area on LPSP Figure H. The maximum build out of Las Palmas planned community was 1031 homes as shown on Figures D and E. (See LPSP Policy 5, Page II-4). The Project site was not given a residential land use designation in the LP Specific Plan. It was shown as an undevelopable parcel in the LP Specific Plan. (See LPSP Figure H). The LP Specific Plan expressly "prohibited building" in the areas as delineated on Figures H and K in which the Project is located. (See LPSP Policy 2, Page II-12). 8.8

3.4 – Consistency with Applicable Plans – Table 3-1 (DEIR Page 3-13) is blank. There is no consistency review included in the DEIR. **This is major defect in the DEIR.** See also comments under Section 3.2 above. The Project is not consistent with the Las Palmas Specific Plan. Nor has there been a consistency analysis done for an amendment to the Las Palmas Specific Plan. 8.9

4.0 Project Description

8.10

The Project Description is inaccurate.

4.1- Project Objectives – The Project does not meet the Project Objectives. The Project is not located in geographic location where there is a need for such a facility. The geographic location is a rural residential community. 8.11

The Project is located "in and near an established community" where "residents in the facility can feel a sense of connection to the local community". It is proposed next to a private property Subdivision, over which the Project residents will have no right to enter, except for the sole purpose of ingress and egress over three specific private roads. 8.12

Not only does placing the Project in this location, not meet the Project objective, it raises a host of security, liability, safety, trespass, and property issues, if Project residents, in fact, decide they want to stroll through the Subdivision. They will not have the right to do that.

Meeting this Project's objectives requires placing this Project in town where the Project residents will have all of the medical services and community amenities they need, available to them and their families. 8.13

Site Access - The Project's sole means of access is through the Subdivision (over Las Palmas Road, River Run and Woodridge Court) which roads are all privately owned and maintained by the LPHOA. 8.14

The Project Applicants who own the Project site **are not members of the LPHOA. They have no right to use of any of the LPHOA property, roads, drainage facilities or other amenities, but for ingress and egress access over portions of three LPHOA private roads.**

Background – The Project Applicant acknowledges density was transferred off Parcel Q. The maximum build out of the entire Las Palmas planned community is 1031 homes as shown on Figures D and E. (See LPSP Policy 5, Page II-4). If density was transferred from the site, it was transferred. The Property did not get more units under the Specific Plan. The total housing number under the Specific Plan is not to exceed 1031. Any housing density beyond 1031 homes in the Las Palmas phased subdivision is inconsistent with the Las Palmas Specific Plan. The Project Applicant admits he needs a Specific Plan Amendment to move forward. This is a marked departure from the established Plan for this community set forth for the Las Palmas Specific Plan when the entire Las Palmas project was developed and properties purchased by Las Palmas residents. The proposed use is inconsistent with the concept and approved Plan for this area. 8.15

5.0 Aesthetics

The Aesthetics analysis underestimates and minimizes the visual and aesthetic impact of the Project, as well as the inconsistency with both the Las Palmas Specific Plan and the Toro Area Plan. 8.16

Public Views - Highway 68 is a State designated scenic corridor and visually sensitive area. The Project is proposed in an area that is the gateway to both the River Road wine corridor and Toro Area's pastoral rolling hills. It is such a sensitive visual location that special protection is called out for the area under the Toro Area Plan. 8.17

At 90,000 – 110,500 sq. ft., with large 2-story and 3-story elements, and sitting on a prominent ridge above the Subdivision, River Road and Highway 68, a State Scenic Highway, the Project will be highly visible.

The Las Palmas Specific Plan required higher density housing to be clustered behind natural land forms, and at lower elevations, and not on slopes or ridgelines to preserve the semi-rural character of the area and mitigate adverse impacts on significant viewshed areas. (See LPSP Policy 7, Page II-4). The LP Specific Plan expressly "prohibited building" in the areas as delineated on Figures H and K in which the Project is located. (See LPSP Policy 2, Page II-12). 8.18

The Las Palmas Specific Plan focused on keeping the area's frontal slopes undeveloped to protect the area's scenic quality. The Project site is within the area that was intended to remain undeveloped for this very reason (See LPSP Figure H and LPSP Policy 2, Page II-12).

Landscape screening cannot "screen" such a large and tall project, nor will it "enhance" the scenic value of the area. Additionally, landscaping will be inconsistent with the natural beauty of the area.

Light and Glare – There will be substantial and significant light and glare impacts to both the traveling public and the adjacent Subdivision. 8.19

This is a large, tall project. At 90,000 – 110,500 sq. ft., with large 2-story and 3-story elements, and sitting on a prominent ridge above the Subdivision, River Road and Highway 68, a State Scenic Highway, light from the Project will be visible.

The facility will have to be well lit for its operation. Lights will need to remain on all night. This is a substantial change from the natural darkness of the site, as it exists. A Lighting Plan does not adequately address the significant impact.

5.4 Environmental Analysis – The Las Palmas Specific Plan sought to protect this site from development as shown on LPSP Figure H and LPSP Policy 2, Page II-12. 8.20

The Project is described as either 90,000 sq. ft. or 110,500 sq. ft.* with a major portion of it two and three stories high.

*Inconsistency in the project description

Page 4-6:

Casitas - 41,341 sf.
Assisted Living- 27,052 sf.
Memory Care – 21,613 sf.
Total 90,000 sf. 8.21

Page 5-24:

Casitas – 28,000 sf.
Assisted living – 43,500,000 sf (assuming that is meant to be 43,500 sf.) – Two stories

Memory Care – 39,000 sf. – Three Stories
Total 110,500 sf.

At 110, 500 square feet it will be larger than the 105,000 square feet size of an average Walmart store, with two and three stories, as well. It will be highly visible and it will be bright. Landscaping and a Lighting Plan cannot adequately mitigate these significant impacts. 8.22

7.0 Biological Resources

The Project will have significant biological impacts. Please see attached letter from Ed Mercurio, Biologist, dated April 12, 2018, submitted herewith on behalf of the LPHOA. 8.23

9.0 Transportation

The Project will have significant transportation impacts to the Subdivision. Please see attached letter from Chris Kinzel, of TJKM Transportation Consultants, dated April 23, 2018, submitted herewith on behalf of the LPHOA. 8.24

10.0 Water Supply

The majority of the Water Supply discussion discusses macro level County-wide water projects and water measures that have little direct relevance to the Project. Moreover, several of these water projects are still in the conceptual stages. (See DEIR pages 10-5 & 10-6). 8.25

The DEIR acknowledges that the Salinas Valley water basin is in overdraft (See DEIR page 10-3). In October 2017, the Monterey County Water Resources Agency released a report entitled *"Recommendations to Address the Expansion of Seawater Intrusion in the Salinas Valley Groundwater Basin"* discussing water overdraft concerns in the Salinas Valley. On December 12, 2017, the County Board of Supervisors and Board of Supervisors of the Monterey County Water Resources Agency directed the Water Resources Agency staff to coordinate with the Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA) and report back to the Board with a strategy for implementation of the report, or other, recommendations. Neither the Water Resource Agency report, nor the report's proposed recommendations, or other proposed recommendations, to address significant water quality issues in the Salinas Valley, are discussed in the DEIR.

There is no discussion in the DEIR regarding the interconnection of the groundwater wells that will actually serve the Project, with the entire California Water Service Company system consisting of 28 wells. Often these "satellite systems", while run by the same Company, do not have an actual interconnectivity. This needs to be clearly described and addressed in the DEIR.

With regard to the estimated water use from the Project, the volume of wastewater produced by the existing Specific Plan area users, is not the same thing as the volume of water used by those same users, because this figure ignores consumptive use. (See DEIR, Page 10-12). Consumptive use is likely dominated by landscape irrigation, swimming pools, etc. Furthermore, an estimation of water demand for outdoor use is not the same thing as actual water used. This issue needs to be addressed in the DEIR. 8.26

Additionally, the overall availability and long term source of recycled water should be stated. If insufficient recycled water is available for landscaping, the demand would most likely be met with potable water. It is also possible the existing Las Palmas treatment plant may be closed if the sewer system becomes connected to the main regional waste water plant in Marina. If that is the case, the recycled water may be gone, altogether. This issue needs to be addressed in the DEIR. 8.27

11.0 Effects Not Found to be Significant

The potential impacts to geology, soils, and surface hydrology are significant and need to be addressed in the DEIR. 8.28

11.4 Geology & Soils and 11.6 Surface Hydrology - There is already known erosion and land slippage occurring on the southern hillside of Project site adjacent to the Subdivision. The DEIR acknowledges that the Project will alter existing storm water drainage conditions and with no analysis of the increased run off and/or erosion that will occur as a result of the Project, leaving how that will be addressed to future studies. CEQA does not allow deferred mitigation. Those plans need to be provided now and included in the DEIR for the public to review.

The Project Applicant continues to assert that the Project will tie in to the existing Subdivision drainage improvements, but the Applicant has provided no legal authority that would authorize him to do that. The Applicant is not a member of the LPHOA and has no right to use LPHOA property for drainage purposes. Again that discussion cannot be deferred, it needs to be addressed.

If storm water were diverted from the Project's elevated plateau with 190,000 square feet of buildings and impermeable surface in to the existing LPHOA drainage system, this would substantially tax the capability of the existing Las Palmas drainage system.

Additionally, portions of the Subdivision are located at the foot of hills and collects drainage from adjacent canyons, which runoff already increases system flows in the rainy season.

What is the Applicants legal right to connect to the existing Las Palmas drainage system? What is the capacity of the existing drainage system to handle this run off? This information needs to be included in the DEIR now and addressed up front. Not deferred.

While the Project is out of flooding danger, the Subdivision has had historic flooding issues. There is no analysis as to the impact the Project would have on potential flooding within the Subdivision. This issue needs to be addressed. 8.29

11.8 Noise – DEIR mentions only noise from construction and employee trips to the Project. There will be much more traffic and noise generated from the Project than this. The Project will require large delivery trucks to bring supplies to the facility, there will be emergency vehicles going to the site (which are loud even without sirens), as well as the resident and visitor traffic, in addition to the employee traffic. This issue needs to be addressed. 8.30

11.9 Public Services – The DEIR acknowledges that the Project will impact the Subdivision's current private security operations. The Project will require increased private security operations. The LPHOA has no provision for sharing its private security operations with the Project. This is an issue of major concern to the LPHOA. 8.31
Not only does the Project cause increased security issues, it causes significant internal traffic issues which have not been addressed (See April 23, 2018 TJKM Traffic Consultant letter). 8.32

13.0 Cumulative Impacts

Traffic - Monterey County recently approved the "Corral de Tierra Neighborhood Retail Village" shopping center (County Resolution No. 12-240) at the corner of Corral de Tierra Road and Highway 68, as well as, the "Ferrini Ranch" residential subdivision (County Resolution No. 14-371) along Highway 68 east of the Project, both of which add traffic to Highway 68 which operates at LOS F. 8.33

There are areas within Toro Area Plan (Toro Plan Policy T-1.7 and B-8 zoning) where homeowners cannot build even one additional unit in the Toro Area, because of traffic considerations, yet for a large Project like this, there is no prohibition. There is no rational basis for, or compelling public benefit from, this Project that would warrant a

finding of Overriding Considerations in this situation to allow a known substantial significant impact to Highway 68 traffic to become further degraded and exacerbated.

14.0 Growth Inducing

The Project is growth inducing. There are significant growth inducing impacts that have not been addressed. 8.34

14.4 Population Growth Inducing – The DEIR continues to claim that Project is not growth inducing because of the zoning. The Las Palmas Specific Plan allowed only 1031 units, and all, but for two, have been constructed.

The Project Applicant acknowledges he needs a Las Palmas Specific Plan Amendment to build this Project at this site. The Project is clearly growth inducing beyond what was approved and anticipated in the Las Palmas Specific Plan. It is placing increased growth in an area inconsistent with the Las Palmas Specific Plan. The growth inducing impacts associated with building this Project in a rural residential setting need to be addressed.

15.0 Significant Unavoidable Impacts

Traffic and Circulation – The DEIR acknowledges there will be significant and unavoidable impacts to traffic and circulation, Highway 68 currently operating at a LOS F. One additional single peak hour trip is a significant impact to Highway 68. The DEIR also acknowledges there are no mitigation measures to reduce the Project level impacts to less than significant. 8.35

There are areas within Toro Area Plan (Toro Plan Policy T-1.7 and B-8 zoning) where homeowners cannot build even one additional unit, because of traffic considerations, yet for a large project like this, there is no prohibition.

There is no rational basis for, or compelling public benefit from, this Project that would warrant a finding of Overriding Considerations in this situation to allow a known substantial significant impact to Highway 68 to become further exacerbated.

Thank you for the opportunity to comment on the RiverView at Las Palmas DEIR

Sincerely,

NOLAND, HAMERLY, ETIENNE & HOSS
A Professional Corporation

Christine G. Kemp

CGK:aac

Enclosures:
April 12, 2018 Mercurio Biological Letter
April 23, 2018 TJKM Traffic Consultant letter

cc: Las Palmas Ranch Master Association No. 1 - Board of Directors

Letter 8

COMMENTER: Christine G. Kemp, Noland, Hamerly, Etienne & Hoss Attorneys at Law, on behalf of the Las Palmas Ranch Home Owners Association

DATE: April 24, 2018

Response 8.1

The commenter provides background information regarding the location and jurisdiction of the project site. The comment is noted.

Response 8.2

The commenter notes that the project site is not part of the LPHOA, but that its sole means of access is though the Subdivision. The commenter states the opinion that the project will create significant unmitigated traffic impacts to the Subdivision roads, and that the proposed traffic mitigations do not adequately address traffic impacts to these roads.

Refer to Topical Response D. As noted therein, with the addition of vehicle trips generated by the project, traffic volumes on residential streets in the Subdivision would remain at acceptable levels based on County thresholds. Therefore, as determined in the Draft SEIR, the project would have a less than significant impact on traffic conditions in the Subdivision. No mitigation is necessary to reduce traffic volumes on Subdivision streets.

Response 8.3

The commenter states the opinion that the project is inconsistent with the rural residential nature of the Subdivision and the LPRSP, which sought to preserve open space, cluster residential units, and minimize visual impacts. The commenter states that the LPRSP did not include a senior residential care facility at this location, and that the Plan has been built out.

Regarding impacts to the rural residential nature of the Subdivision, refer to pages 5-30 to 5-50 of the Draft SEIR, which includes an analysis of the project's potential to impact existing visual character. Refer to Topical Response F for additional discussion of visual impacts.

Regarding consistency with the LPRSP, refer to Topical Response C. As noted therein, the project would be consistent with LPRSP policies and the residential unit cap for the LPRSP Plan Area is not applicable to the proposed project because the project is not residential.

Response 8.4

The commenter describes potential visual and aesthetic impacts of the project, including the project's visibility from the Subdivision, River Road, and SR 68, a State Scenic Highway. The commenter states that the project does not include sufficient mitigation for the visual impacts of large buildings. The commenter states that the project would cause a night light impact to the Subdivision and surrounding area, and that the impact is not sufficiently mitigated.

Please refer to Topical Response F. As described therein, the project would be visible from local roads and would also be visible from Subdivision residences. However, the project plans incorporate visual screening, and mitigation measures further reduce aesthetic impacts, including night sky light pollution, to a less than significant level.

Response 8.5

The commenter states that the project could cause significant erosion and drainage issues for the Subdivision.

Refer to Topical Response E. As noted therein, compliance with recommendations in the geotechnical report, which would be required as a condition of project approval, and compliance with applicable County code requirement would ensure there would be no significant impacts associated with erosion or drainage.

Response 8.6

The commenter states the opinion that Project Summary mischaracterizes the project and is inaccurate. The commenter states that the project is not consistent with the LPRSP, which did not allocate housing or development for the project site. The commenter notes that the LPRSP prohibited building in areas delineated on Figures H and K of the Specific Plan, in which the project is located.

The project site is designated Medium Density Residential on Figure E of the LPRSP. Figure H identifies areas with frontal slopes/ridgelines visible from designated scenic corridors, and Figure K is a conceptual cross-section depicting suggested screening for future development and is not related to land use designations. According to LPRSP Policy 2, buildings should be prohibited on these ridgelines. The project site is not identified in Figures H and K as a frontal slope or ridgeline; therefore, the project is not subject to this policy. Additionally, the project site's land use designation of Medium Density Residential inherently allows development on the site. For additional discussion on land use consistency, refer to Topical Response C.

Response 8.7

The commenter states the opinion that the description of the project's Environmental Setting mischaracterizes the project setting and is inaccurate.

Refer to Responses 8.6 above and 8.9 below.

Response 8.8

The commenter states that the project site was not proposed for development in the LPRSP.

Refer to Response 8.6 above.

Response 8.9

The commenter states that Table 3-1 of the Draft SEIR is blank and that the Draft SEIR does not include a consistency review. The commenter states that the project is not consistent with the LPRSP and that a consistency analysis was not done for an amendment to the LPRSP.

Refer to Topical Response C. As noted therein, Table 3-1 was erroneously omitted from the Draft SEIR. The table has been included; refer to Topical Response D and Section 4, *Amendments to the Draft SEIR,* for the full text of this table. As shown therein, the project is consistent with the LPRSP.

The inclusion of Table 3-1 in the Final SEIR does not represent significant new information because the content of the table either summarizes analysis included elsewhere in the Draft SEIR, or merely clarifies or amplifies such analysis.

Response 8.10

The commenter states that the Project Description is inaccurate. Detailed comments about the Project Description are provided in comments 8.11 through 8.15. Refer to Responses 8.11 through 8.15 below.

Response 8.11

The commenter states the opinion that the project does not meet the project objectives because it is not in a location that is in need of a senior care facility. The commenter states that in order to meet the project's objective, the project should be placed closer to medical services and community amenities.

The project objective referred to in Draft SEIR Section 4.0, *Project Description*, states, "to provide such a facility in a geographic location where the need for such a facility is clearly needed and where adequate facilities currently existing or can be readily provided." The assisted living facility is designed specifically for seniors who may need a full range of assistance to meet their living needs. The facility would provide a full range of services including meals, medical assistance, transportation, cleaning and laundry service is available for each resident.

The subject property was selected for development of a senior assisted living community because of the tranquility of its natural setting, its location among the established communities of Las Palmas Ranch 1 and 2, Pine Canyon, Toro Park and Serra Village, and its ready access to public sewer and water systems. With approximately 15.7 acres, it was believed to be ideal for incorporating comfortable indoor amenities while also providing sufficient safe, outdoor spaces for walking and exercise, imperatives to healthy living.

Market research and analysis of the subject plot was issued in September 2013 by Senior Living Valuation Services, Inc. (appraisers and consultants to the senior housing industry) to determine suitability and viability of the property for a senior assisted living facility. In August 2015, after the original concept evolved and had been refined, a feasibility study was commissioned and issued by ALPDC, LLC.

Senior Living Valuation Services, Inc. confirmed, "Based on our analyses of the local senior housing market and considering the characteristics of the subject development as proposed, it is our opinion that the highest and best use of the site as vacant is as a senior retirement community, assuming entitlements can be obtained". The latter, Assisted Living Planning and Development Consultants, concluded "… we have utilized conservative methods in establishing market strength in the Salinas area. It is our estimate that with this data outlined herein there is a good market for Assisted Living and Alzheimer's/dementia care in Salinas within the target market and income we've recommended."

Section 11.9, *Public Services*, has been revised to include information about existing public services and facilities in the vicinity of the project site which may be utilized by project residents and employees, such as the Buena Vista Branch Library operated by the Monterey County Free Libraries and the Salinas Valley Memorial Hospital which is the nearest public hospital to the project site. The Monterey County Regional Fire District and Sheriff's Office provide fire and police protection services, respectively, to the project site and vicinity. The project would not impact that level of service experienced by current residents.

Response 8.12

The commenter disputes the Draft SEIR's statement that the project will provide seniors with a sense of connection to the local community. The commenter states that the seniors served by the project would not have the right to spend time in the Subdivision other than for ingress and egress. The commenter notes that the project's only access is through Subdivision roads that are privately owned and maintained by the LPHOA, and that the project applicants do not have the right to use LPHOA property other than for ingress and egress over portions of Las Palmas Road, River Run Road, and Woodridge Court.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response A. As noted therein, the proposed project would participate proportionately in the cost of the Subdivision's security service. To clarify the proposed cost-sharing arrangement, the Draft SEIR has been amended to clarify that a written agreement between the project applicants and the LPHOA would be required in order to clarify cost-sharing associated with use of the streets, drainage facilities, and security operations.

Please also refer to Topical Response D for a discussion of a separate entry for the project. As noted therein, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts.

Further, it should be noted that the project site is within the Specific Plan Area and adjacent to development, which is consistent with the project objective to provide such a facility in and near an established community so that residents in the facility can feel a sense of connection with local residents and where in turn local residents as they age or their circumstances change can relocate to an assisted living facility without the need to move from their community or far away from their families (refer to Section 4.1 of the Draft SEIR).

Response 8.13

The commenter expresses the opinion that meeting project objectives would require placing the project in town where residents would have all the medical services and community amenities they need.

Refer to Response 8.11. As noted therein, future residents of the proposed project would be adequately served by emergency, medical, and other public services.

Response 8.14

The commenter states that the project's sole means of access is through the Subdivision, that the applicants are not members of the LPHOA, and have no right to use any Subdivision property, roads, drainage facilities, or other amenities but for ingress and egress access over portions of three private Subdivision roads.

Page 4-17 of the Draft SEIR states that the project applicants are members of the LPHOA, have paid dues to the association, and would pay a proportionate share for the use of the roads and the drainage system. As noted in Topical Response I, page 4-6 of the Draft SEIR has been revised to clarify that an agreement would be required between the LPHOA and the project applicants, who

own the project site, to clarify cost-sharing associated with use of the streets, stormwater drainage facilities, and security operations .

Response 8.15

The commenter states that the total housing number allowed by the LPRSP is 1,031 homes, and that the housing proposed by the project is inconsistent with the concept and approved plan for the area.

Refer to Topical Response C. As noted therein, the proposed project is not a residential use, and the LPRSP residential unit limitation of 1,031 does not apply to this project. In addition, the project is consistent with the LPRSP and other relevant planning plans and policies.

Response 8.16

The commenter states that the aesthetics analysis underestimates and minimizes its description of impacts and inconsistencies with local plans.

Please refer to Topical Response F for a discussion of visual impacts. Refer to Topical Response C for a discussion of consistency with local plans and policies.

Response 8.17

The commenter states the project will be highly visible from State Route 68, which is a State designated scenic corridor and visually sensitive area, with special protection under the Toro Area Plan.

Refer to Response 4.3 above for a summary of impacts to designated and proposed scenic roadways, including SR 68. Impacts to visual character are assessed utilizing the CEQA Appendix G checklist questions, which include consideration of whether a project would have “a substantial adverse effect on a scenic vista” or “substantially degrade the existing visual character or quality of the site and its surroundings.” Mere visibility does not constitute a significant environmental effect under CEQA.

Response 8.18

The commenter states that the project site is within an area in which the LPRSP prohibits development. The commenter states that the landscaping would not be able to screen the project and would be inconsistent with the area’s natural beauty.

The project site is not on Figures H or K; therefore, the prohibited building area is not applicable. Further, the project area was planned for development, in contrast to the commenter’s claim.

The existing conditions of the project site are characterized by a largely flat plateau dominated by non-native grasses and non-native eucalyptus trees. This would be altered to 13 single-story structures, with a total of approximately 80 eucalyptus trees removed as part of the project. Landscape screening as mitigation is not intended to entirely block the buildings, but rather soften the views of the proposed buildings. New landscaping would not be inconsistent with the surrounding areas, considering that the project site is adjacent to the Subdivision and its existing landscaping.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site’s zoning and land use requirements.

Response 8.19

The commenter states that the project will create significant light and glare impacts to the traveling public and the Subdivision, as the project is large and will need to be lit overnight. The commenter states that the project's lighting will be a substantial change from the existing natural darkness, and that a lighting plan does not adequately address this impact.

Refer to Topical Response F for a summary of light and glare impacts**.** Impacts to light and glare are assessed utilizing the CEQA Appendix G checklist questions, which include consideration of whether a project would "create a new source of substantial light or glare which would adversely affect day or nighttime views in the area." Mere visibility does not constitute a significant environmental effect under CEQA.

The required lighting plan would include the location, type, and wattage of all light fixtures, including catalog sheets for each fixture. The review of the lighting plan by the RMA Chief of Planning during the permit approval process would ensure that lighting is compliant with current lighting standards. Therefore, the provision of a lighting plan would reduce impacts to less than significant. Please refer to Page 5-29 of the Draft SEIR for additional information on the lighting plan.

Response 8.20

The commenter states that the LPRSP sought to protect the project site from development.

Refer to Response 8.6 above. As stated therein, the project site is planned for development under the LPRSP.

Response 8.21

The commenter states that there are inconsistencies in the Draft SEIR regarding the project's square footage, which is alternately listed as 90,000 or 110,500 square feet.

The Casitas units would be single-story structures, while the assisted living facility and memory care facility would be two- and three-story structures, respectively. Therefore, in relation to the Casitas, the assisted living facility and memory care facility would have a greater square footage to site coverage ratio.

The tally of 110,000 square feet (sf) is the sum of the square footage of the project's structures. The tally of 90,000 square feet is the sum of the total site coverage for the three types of facilities.

As noted in Section 4.0, *Project Description*, the total site coverage for the project would be approximately 190,000 square feet (including roads/driveways/parking) and the total floor area would be approximately 110,085 square feet. The precise floor area tally is broken down as follows: 27,993 sf (Casitas) + 43,384 sf (assisted living facility) + 38,708 sf (memory care facility) = 110,085 sf.

Response 8.22

The commenter states that the project will be larger than the size of an average Walmart store (105,000 sf), and that landscaping and a lighting plan cannot mitigate the project's aesthetic impacts.

Please refer to Topical Response F for a discussion of the project's aesthetic impacts. It should also be clarified that the project would not be composed of a single-story "big box" building with little variation in roofline, massing, or fenestration. As noted in Response 8.21, the building coverage

would be 90,000 sf, including 15 separate structures. Therefore, comparison to a Walmart store is misleading.

Response 8.23

The commenter states that the project would have significant biological impacts, as described in a separate letter from biologist Ed Mercurio.

The referenced letter is included herein as Letter 5. Please refer to Responses 5.1 through 5.3.

Response 8.24

The commenter states that the project would have significant transportation impacts to the Subdivision, as described in a separate letter from Chris Kinzel of TJKM Transportation Consultants.

The referenced letter is included herein as Letter 7. Please refer to Responses 7.1 through 7.9.

Response 8.25

The commenter states that the Draft SEIR should discuss the 2017 report on seawater intrusion by the Monterey County Water Resources Agency, and the Agency's recommendations on implementation of the report.

The commenter may be referring to MCWRA's Recommendations to Address the Expansion of Seawater Intrusion in the Salinas Valley Groundwater Basin (2017).

In response to this comment, the following revision has been made to Section 10.0, *Water Supply*, of the Draft SEIR, page 10-13:

> The MCWRA's Recommendations to Address the Expansion of Seawater Intrusion in the Salinas Valley Groundwater Basin (2017) provides a discussion of the current knowledge and related background information surrounding seawater intrusion pathways and potential impacts thereof on the Salinas Valley Groundwater Basin. Six specific recommendations are included in the report with the objective of having the strongest potential to ensure success in slowing or halting father seawater intrusion when implemented simultaneously. The report also indicates each recommendation can be implemented on its own.
>
> The recommendations from the report are as follows:
>
> 1. An immediate moratorium on groundwater extractions from new wells[2] in the Pressure 400-Foot Aquifer[3] within an identified Area of Impact[4], except for the following use categories:
>
>   a. Wells operating under the auspices of the Castroville Seawater Intrusion Project; and,
>
>   b. Monitoring wells owned and maintained by the Agency or other water management agencies.

[2] "New well" is not intended to include (a) any well for which a construction permit has been issued by the Monterey County Health Department or (b) any well for which drilling or construction activities have commenced in accordance with a well construction permit issued by the Monterey County Health Department.

[3] Aquifer means: a water-bearing or saturated formation that is capable of serving as a groundwater reservoir supplying enough water to satisfy a particular demand, as in a body of rock that is sufficiently permeable to conduct groundwater and to yield economically significant quantities of water to wells and springs (Poehls and Smith, 2009).

[4] See Section 1.5 of the report for a description of the Area of Impact. The Area of Impact is also depicted in Figure 4.

2. Enhancement and expansion of the Castroville Seawater Intrusion Project (CSIP) Service Area. The expansion should include, at a minimum, lands served by wells currently extracting groundwater within the Area of Impact.
3. Following expansion of the CSIP Service Area, termination of all pumping from existing wells Pressure 180-Foot or Pressure 400-Foot Aquifer wells within the Area of Impact, except for the following use categories:
    a. Municipal water supply wells;
    b. Wells operating under the auspices of the Castroville Seawater Intrusion Project; and,
    c. Monitoring wells owned and maintained by the Agency or other water management agencies.
4. Initiate and diligently proceed with destruction of wells in Agency Zone 2B, in accordance with Agency Ordinance No. 3790, to protect the Salinas Valley Groundwater Basin against further seawater intrusion.
5. An immediate moratorium on groundwater extractions from new wells within the entirety of the Deep Aquifers of the 180/400 Foot Aquifer and Monterey Subbasins until such time as an investigation of the Deep Aquifers is completed and data pertaining to the hydraulic properties and long-term viability of the Deep Aquifers are available for knowledge-based water resource planning and decision making.
    a. Monitoring wells, public agency wells, municipal water supply wells, wells for which a construction permit has already been issued, and well repairs should be considered for exemption from this recommendation.
    b. The moratorium should include a prohibition of:
        i. Replacement wells, unless it can be demonstrated that the installation of such a well will not result in further expansion of the seawater intrusion front; and,
        ii. Deepening of wells from overlying aquifers into the Deep Aquifers, deepening of wells within the Deep Aquifers, and other activities that would expand the length, depth, or capacity of an existing well.
    6. Initiate and diligently proceed with an investigation to determine the hydraulic properties and long-term viability of the Deep Aquifers.

Implementation of any of the above recommendations would serve to further guard the aquifer(s) against seawater intrusion and contribute to the long-term sustainability of the groundwater supply for the Salinas Valley Groundwater Basin that would provide water for the project. Also see Response 3.3 regarding groundwater management and conservation.

Response 8.26

The commenter states that the volume of wastewater produced by existing Specific Plan area users does not provide an accurate estimate for water use, because the figure ignores consumptive use such as irrigation and swimming pools. The commenter states that estimation of water demand for outdoor use does not equate to actual water used.

The volume of wastewater produced by the existing Specific Plan area uses was not used to estimate water use/demand for the project. Outdoor use is already a component of the water

demand factors used and is not generated separately. In addition, because the project would use low-water use landscaping water demand from irrigation is expected to be very low.

Response 8.27

The commenter states that the overall availability and long-term source of recycled water should be discussed, because landscaping would use potable water if demand was not met by recycled water. The commenter notes that the existing Las Palmas treatment plant may close in the future, eliminating the source of recycled water.

The project would use recycled water from the Las Palmas treatment plant. The potential for the treatment plant to close is speculative. Nonetheless, the water demand calculations include irrigation, and thus, the Draft SEIR (Section 10.0, *Water Supply*, page 10-12) analysis does not assume the use of recycled water. Impacts to water supply would be still be less than significant, with or without the availability of recycled water.

Response 8.28

The commenter requests analysis of how the project's impacts on stormwater drainage would affect existing erosion on the southern hillside of the project site. The commenter states that the applicant has not provided proof of legal authority to tie in to existing Subdivision drainage improvements, and that diverting water from the project site would strain the Las Palmas drainage system.

Please refer to Topical Response E. As indicated therein, a Conceptual Stormwater Control Plan was prepared for the project by Gateway Engineering, Inc. and has been developed for the project as part of the preliminary design to address stormwater management for the project site in conformance with County and State regulatory requirements. The site drainage is specifically designed to meet County and regulatory requirements, and emulate pre-development conditions, resulting in the water volume, rate and quality of stormwater leaving the site being similar to current conditions. As a result, there would be no project-related downstream or off-site impacts related to flood hazards or stormwater quality related to project operation.

Response 8.29

The commenter states that the Draft SEIR does not analyze impacts on flooding in the Subdivision.

Please refer to Topical Response E for a discussion of potential off-site flooding impacts. As noted therein, the project includes on-site stormwater control measures designed to achieve zero net increase in the rate of stormwater discharge relative to pre-project conditions. This would reduce the potential for runoff from new development to exceed the capacity of storm drainage facilities and contribute to off-site flood hazards.

Response 8.30

The commenter states that the Draft SEIR does not analyze operational noise impacts of the project.

Please refer to Topical Response H for a detailed assessment of operational noise impacts.

Response 8.31

The commenter states that the project would impact the Subdivision's private security operations, and that the LPHOA has no provision for sharing its private security operations with the project.

Please refer to Topical Response A. As noted therein, the proposed project would participate proportionately in the cost of the Subdivision's security service. To clarify the proposed cost-sharing arrangement, the Draft SEIR has been amended to clarify that a written agreement between the project applicants and the LPHOA would be required in order to clarify cost-sharing associated with use of the streets, drainage facilities, and security operations .

Response 8.32

The commenter states that the project would cause internal traffic issues, as described in the separate letter from Chris Kinzel of TJKM Transportation Consultants.

The referenced letter is included herein as Letter 7. Please refer to Responses 7.1 through 7.9.

Response 8.33

The commenter expresses concern over cumulative traffic impacts, and states the opinion that there is no public benefit that would warrant a statement of overriding considerations for significant cumulative traffic impacts.

Refer to Response 7.8 for a discussion of cumulative traffic impacts. The commenter's opinion regarding the lack of public benefit is noted and herewith shared with the County's decision makers for consideration.

Response 8.34

The commenter states that the project's growth-inducing impacts are not addressed in the Draft SEIR and suggests that the project would result in significant population growth.

The Draft SEIR addresses growth-inducing impacts in Section 14.0, *Growth Inducing*. As stated therein, the proposed project is not a residential use under the Monterey County Code or the specific plan and the project does not provide dwelling units that operate or function as independent units; therefore, the project would not result in a direct population increase. This section also addresses economic growth inducement and the potential for the project to remove impediments to growth, consistent with the State CEQA Guidelines.

Response 8.35

The commenter states the opinion that there is no public benefit that would warrant a statement of overriding considerations for significant cumulative traffic impacts.

Refer to Response 8.33 above.

ANTHONY LOMBARDO & ASSOCIATES
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April 24, 2018

4813.000

Letter 9

Mr. Joe Sidor
Monterey County RMA
1441 Schilling Place
Salinas, CA 93901

RE: River View at Las Palmas/DSEIR Comments

Dear Joe:

We have reviewed the draft subsequent environmental impact report (DSEIR) for the River View at Las Palmas project. We think that as a whole the DSEIR accurately and adequately describes the project, its potential impacts and provides more than adequate mitigation for those impacts. We do have a few specific comments: 9.1

COVER: 9.2

It is undoubtedly unusual for there to be comments on the cover of a DSEIR. In this case though it would be appropriate for the cover to be amended to show from the very beginning that this document was prepared by Monterey County based on an administrative draft level document prepared by EMC Planning Group and that it does represent the independent judgment of Monterey County. We recognize that this issue is discussed on page 1.1 but we do believe it is important to be clear from the very start that this is Monterey County's document.

SUMMARY

Page 2-1: The project description should be expanded to more fully describe the project. We recognize that there is a much more detailed project description later in the DSEIR. For consistency in the document and to avoid potential confusion over the project description this portion should describe the number of buildings, their uses, parking and similar points to assure the reader has a full scope of the project early on in their review of the document. 9.3

Page 2-2: Traffic is identified as a significant unavoidable impact which cannot be mitigated to an insignificant level. We recognize that this determination is based on Caltrans' standard of finding one additional trip on a highway that currently operates at level D or less to be significant. However, we believe, based on the Las Palmas Ranch Specific Plan approvals, subsequent development and full mitigation of the Las Palmas Ranch traffic impacts, traffic from River View at Las Palmas is not a significant impact. We will address this more fully in our comments on traffic, but it should be clearly noted early in the document, that the Las Palmas Ranch Specific Plan and EIR projected a substantially higher number of traffic movements than currently exist or will exist with the addition of this project. The required mitigations, which were fully implemented, were based on an even higher traffic estimate, have been completed. 9.4

The document should also discuss and analyze the positive impacts of the anticipated improvements to Highway 68 that will be funded by Measure X taxes and the traffic mitigation fees the developer will be required to pay. 9.5

ENVIRONMENTAL SETTING

Page 3-2: The document states "While not the CEQA baseline to determine the potential environmental impacts of this project, individual and cumulative impacts should also be viewed in the context of the level of development and associated impacts of the specific plan." We believe it is appropriate to also recognize the individual and cumulative impacts this project would have in light of the more substantial impacts which were anticipated in the LPRSP and its EIR. This will show that the cumulative effect of this project will still be significantly less than the impacts that were projected for Las Palmas and for which there were specific and full mitigation. 9.6

PROJECT DESCRIPTION

Page 4-6: The DSEIR states "The total floor area, including casitas units, is approximately 110,085 square feet." This should be corrected to read that the total floor area is approximately 90,000 ft.". 9.7

Page 4-18: It should be noted that as an assisted living facility River View at Las Palmas will be licensed by the State of California and will be subject to routine State inspections. 9.8

Page 4-20: It should be noted that although the maximum capacity of Riverview at Las Palmas is 142 beds the occupancy rate will generally be about 90%. 9.9

AESTHETICS

Page 5-1: The significant views that are mentioned in the DSEIR in the location of the project and the Las Palmas One are generally to the east and the south and away from the project site. The view of Las Palmas One from River Road is primarily that of a suburban subdivision. The view of the project site from River Road in the vicinity of Las Palmas is limited due to topography and vegetation. 9.10

Page 5-2: Embedded in the discussion on public views is mention of private views from inside the Las Palmas One subdivision. It should be clearly stated that neither the 2010 General Plan, the 2010 Toro Area Plan, or the Las Palmas Ranch Specific Plan protect private views. 9.11

Page 5-22: The DSEIR should include that the LPRSP FEIR (pp 56-59) recognized that the development of Las Palmas Ranch would "... be expected to change from the existing open land/agriculture to a more urban setting softened by landscaping, entry way treatment and architectural control [and] given the distance from the highway (3/4 mile) and the level of development envisioned by the Toro Vista development [now Ferrini Ranch] visual impacts on Highway 68 are insignificant." The FEIR goes on to prescribe mitigations measures for the Las 9.12

Palmas Ranch development. Those same mitigations are incorporated into the design of River View at Las Palmas.

AIR QUALITY

Page 6-18: The DSEIR should note that the Monterey County 2010 General Plan, various area plans, and Coastal Land Use Plans include policies which will significantly limit future development, particularly new residential subdivisions. Examples would be the Carmel Valley Master Plan limit on new units, Greater Salinas Area Plan policy GS-1.13, North County Area Plan policy C-1.5 and Toro area plan policy T-1.7. 9.13

BIOLOGY

Page 7-22: The DSEIR states that the eucalyptus trees that are proposed to be removed are not native and are not a protected species in Monterey County. The DSEIR should also state that the eucalyptus trees represent a significant fire hazard in the removal of those trees is supported by the local fire district. 9.14

GREEN HOUSE GAS EMISSIONS

No comments.

TRANSPORTATION AND TRAFFIC

Page 9-7: The DSEIR states $50,000,000 of the TAMC Measure X revenues are earmarked for improvements to Highway 68. During the course of the campaign for Measure X TAMC representatives stated at different times that the passage of Measure X would elevate Monterey County to a "self-help County" and would put the County in the better position to compete for matching funds and grants for road improvements. The DSEIR should estimate what $50 million of tax revenue could mean in real dollars for improvement projects on Highway 68. 9.15

Page 9-12: The DSEIR should also note that the traffic impact analysis prepared for this project states that the impact of the added traffic from this project on Highway 68 would be "imperceptible." 9.16

Page 9-23: The DSEIR does a good job in discussing the history of traffic mitigations that were required and subsequently fully implemented by the developers of Las Palmas Ranch. The DSEIR also explains that the current and cumulative traffic will be significantly below the traffic estimates upon which those mitigations were based. The DSEIR should make it very clear that the mitigations required by the Board of Supervisors were a mitigation for the entirety of the development of Las Palmas Ranch and were based on much higher traffic estimates.

Page 9-24: The DSEIR concludes, based solely on the Caltrans standard, that the impact of the additional trips on Highway 68 is significant and unavoidable. It is our belief the traffic impacts from River View at Las Palmas, given the history of the development of Las Palmas Ranch, have already been fully mitigated. As previously discussed, the entire anticipated traffic impact of Las 9.17

Palmas Ranch was fully mitigated. All of the mitigations which were required were implemented and were based on substantially higher traffic numbers than currently exist or will exist when this project is completed.

The DSEIR should also discuss how traffic fees are mitigation for project impacts. The courts determined in the September Ranch case that payment of traffic mitigation fees are sufficient when there are specific projects anticipated to which those fees will be applied. Prior to Measure X there were not projects "on the board." There is now a substantial number of Highway 68 projects planned and a source of funding for those projects has been identified. Payment of traffic fees for this project should be directed toward the Highway 68 projects and be considered, combined with historic mitigation, to be adequate mitigation for this projects "imperceptible (Higgins report)" impacts. 9.18

WATER SUPPLY

No comments.

EFFECTS NOT FOUND TO BE SIGNIFICANT

No comments.

ENERGY

No comments.

CUMULATIVE IMPACTS

Page 13-7: The DSEIR concludes, based solely on the Caltrans standard, that the impact of the additional trips on Highway 68 is significant and unavoidable. It is our belief that these impacts, given the specific circumstances of the development of Las Palmas Ranch, have been fully mitigated. As previously discussed, the higher estimated traffic impact of a larger Las Palmas Ranch development was fully mitigated. All of the mitigations which were required were implemented. The current and cumulative traffic levels are well below the original projections. 9.19

GROWTH INDUCING

No comments.

SIGNIFICANT UNAVOIDABLE IMPACTS

Page 15-1: As has previously been noted, the DSEIR concludes that the traffic impact of the Riverview project on Highway 68 is significant and unavoidable and cannot be mitigated. This is based on the Caltrans standard that the addition of one traffic movement to an impacted highway is significant and unavoidable. The traffic impact analysis concluded that the traffic from this project will be "imperceptible" on Highway 68. Additionally Las Palmas Ranch implemented a range of mitigations and paid fees based on a substantially higher traffic estimate than what currently exists or will cumulatively exist with the addition of the Riverview project. 9.20

Also the River View project will pay both Monterey County and TMC traffic impact fees. Those fees can be directed to plan improvements on Highway 68 and will provide additional mitigation. The conclusion that, in this specific circumstance, traffic presents a significant and unavoidable impact is incorrect. 9.21

IRREVERSIBLE IMPACTS

No comments.

ALTERNATIVES

No comments.

We hope you find our comments helpful. We look forward to continuing to work with you on this project.

Sincerely,

Dale Ellis
DE/al

cc: Brandon Swanson, Planning Services Manager
Clients

Letter 9

COMMENTER: Dale Ellis, Anthony Lombardo & Associates

DATE: April 24, 2018

Response 9.1

The commenter states that the Draft SEIR adequately describes the project and its impacts, and provides adequate mitigation, but notes they have some specific comments.

The commenter's individual concerns are addressed below.

Response 9.2

The commenter states that the cover page of the Draft SEIR should indicate that the document was prepared by Monterey County based on a document prepared by EMC Planning Group and that it represents the independent judgment of Monterey County.

The *Introduction* section of the Draft SEIR includes a description of the authorship of the Draft SEIR. In addition, the cover of this Final SEIR indicates that the document was prepared by Monterey County.

Response 9.3

The commenter states that the project summary in Section 2.0, *Summary*, of the Draft SEIR should be expanded to more fully describe the project.

In response to this comment, the following revisions have been made to the top of page 2-2 in Section 2.1:

> River View at Las Palmas Senior Living Community (the proposed project) is designed to provide a range of assisted care to seniors over the age of 55 and to persons with diminishing mental capacity due to Alzheimer's, dementia, or similar causes. The entire facility would be licensed by the State of California as a Residential Care Facility for the Elderly. The senior community would be comprised of three levels of residence, each with their own level of assistance: Casitas, Assisted Living Facility, and Memory Care Facility. There are 13 Casitas structures providing 26 separate units (referred to as A, B or C units) with a total of 42 beds. The assisted living facility is a two-level structure approximately 28 feet in height and will cover about 27,000 square feet. The assisted living facility includes 40 living units ranging from 360 to 587 square feet and a total of 52 beds. The memory care facility is a three-level structure approximately 30 feet in height and will cover about 21,600 square feet. The memory care facility includes 39 living units ranging from 313 to 453 square feet and a total of 48 beds. Total site coverage is approximately 190,000 square feet (27.8 percent of the project site). River Road provides the northern boundary of the property. There is no direct access from River Road and none is proposed. Access to the site is from the signalized intersection at River Road and Las Palmas Road to River Run Road, then Woodridge Court. River Road is a public road maintained by the County of Monterey. Additional details are provided in Section 4.0, *Project Description*.

Response 9.4

The commenter states that the project's traffic impacts should be considered less than significant, based on LPRSP traffic projections and mitigations. The commenter notes that they provide more detail on this issue in subsequent comments.

Although the increase in traffic volumes would be minimal, due to LOS F operations on SR 68, even one more trip added to SR 68 is considered a significant and unavoidable impact. The fact that the LPRSP EIR assumed a higher volume of traffic is noted. However, due to the relevant threshold for SR 68, project-level impacts remain significant and unavoidable.

Please refer below to Responses 9.15 through 9.18, which address the commenter's more detailed comments regarding traffic.

Response 9.5

The commenter states that the Draft SEIR should discuss the positive impacts of SR 68 improvements that the fees for this project would support.

Please refer to Response 9.15 below, which responds to the commenter's more detailed comments regarding SR 68 improvements.

Response 9.6

The commenter states the opinion that the Draft SEIR should consider the environmental impacts anticipated by the LPRSP and its Draft SEIR, to show that the project's impacts would be less than the overall impacts anticipated by the LPRSP.

The commenter's opinion is noted. However, the Draft SEIR appropriately utilizes an existing baseline. No revisions to the Draft SEIR are warranted.

Response 9.7

The commenter states that page 4-6 should correct the floor area square footage from 110,085 to 90,000.

Please refer to Response 8.21.

Response 9.8

The commenter states that page 4-18 should note that the senior assisted living facility would be licensed by the state of California and routinely inspected.

In response to this comment, Page 4-18 of the Draft SEIR has been revised as follows:

> **Conditional Use Permit and Design Review**
>
> The proposed project will require approval of a Conditional Use Permit from the County of Monterey. The proposed project would also be licensed by the State of California and subject to routine State inspections.
>
> Specifically, the proposed project would require the granting of a Combined Development Permit consisting of: 1) Use Permit and Design Approval to allow the construction and operation of an approximately 90,000 square foot assisted senior living facility consisting of multiple

structures and associated site improvements on an approximately 15.74-acre site; and 2) Use Permit to allow development on slopes exceeding 25 percent.

Response 9.9

The commenter states page 4-20 should note that the senior assisted living facility would generally have an occupancy rate of about 90 percent, below the maximum capacity of 142 beds.

The comment is noted. The Draft SEIR does specify that 142 is a maximum bed count. The maximum count is listed as the accommodated population for the purpose of conservative estimation.

Response 9.10

The commenter states that the views of the project site are limited due to topography and vegetation, and that the scenic views described in the Draft SEIR are generally away from the project site.

The comment is noted. The comment is correct in noting that the project site is minimally visible from River Road due to topography and vegetation.

Response 9.11

The commenter states that although the Draft SEIR discusses views of the project site from private residences, private views are not a protected resource under the Monterey County General Plan or the applicable local plans. The commenter recommends that this distinction be noted in the Draft SEIR.

Please refer to Topical Response F regarding views of the site. As stated therein, impacts to scenic resources and private views would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Response 9.12

The commenter states that the Draft SEIR should specify that the LPRSP EIR recognized that development of the Plan Area would make the area more urban, but that visual impacts from SR 68 would not be significant. The commenter notes that the LPRSP EIR prescribed mitigation measures that are now incorporated into the River View project.

The passage of the LPRSP EIR that the commenter refers to is cited in the Draft SEIR on pages 5-23 and 5-24 of Section 5.0, *Aesthetics*.

Response 9.13

The commenter states that page 6-18 of the Draft SEIR should note that the Monterey County General Plan and other applicable plans include policies that significantly limit future development, especially new residential subdivisions.

Several policies in the Land Use Element, including Policies LU-1.4 through LU-1.8, LU-1.9, and LU-1.20, limit development through a variety of methods such as evaluating land suitability, concurrency requirements, and preservation of agricultural and open space land.

Response 9.14

The commenter states that the Draft SEIR should state that the eucalyptus trees that the project would remove are not native, not protected, and are currently a fire hazard.

In response to this comment, page 7-23 of the Draft SEIR, under the subheading "Tree Removal" is revised as follows:

> The proposed project does not include the removal of trees protected by the Monterey County Municipal Code, Chapter 16.60 – Preservation of Oak Trees and Other Protected Trees within the Toro Plan area. Eucalyptus trees proposed for removal on the project site are not native and therefore, are not protected by the county. Additionally, eucalyptus trees represent a significant fire hazard, and the removal of such trees is supported by the local fire district.

Response 9.15

The commenter states that funds have been earmarked for SR 68 improvements. The commenter states that the Draft SEIR should discuss the impact that improvement projects would have on SR 68.

The comment pertains to TAMC Measure X revenues and does not address the adequacy of the Draft SEIR or CEQA process. Therefore, no further response is required.

Response 9.16

The commenter states that the Draft SEIR should include a statement that the impact of added traffic on SR 68 would be imperceptible.

As discussed therein, page 9-24 in the Draft SEIR states that the project would add an estimated one AM peak hour trip and four PM peak hour trips to the two-lane section of SR 68 immediately west of the Toro Park interchange. Although the increase in traffic volumes on SR 68 would be minimal, it would contribute to existing unacceptable traffic conditions on the highway.

Response 9.17

The commenter states that the Draft SEIR should make clear that mitigation required by the County for the entire Las Palmas Ranch development was based on much higher traffic estimates than the existing and cumulative traffic volumes estimated in the Draft SEIR. The commenter asserts that even after project completion, traffic would be less than originally anticipated and mitigated for.

As stated previously, the Draft SEIR appropriately utilizes an existing baseline. No revisions to the Draft SEIR are warranted.

Response 9.18

The commenter states that the Draft SEIR should discuss traffic fees as mitigation for traffic impacts. The commenter expresses disagreement that traffic is a significant and unavoidable impact.

The Draft SEIR applies the Caltrans threshold that adding even a single trip to existing LOS F conditions on a State highway is a significant impact. Based on this State threshold, even if prior traffic mitigation for the LPRSP was already implemented at SR 68, the addition of new trips to existing unacceptable traffic conditions on this highway would amount to a significant and unavoidable impact. Page 9-24 of the Draft SEIR notes that the payment of regional traffic fees would mitigate this impact to an extent. However, "the project would not be directly implementing

any improvements to offset its impacts and will, therefore, have an unmitigated significant impact on SR 68." Page 9-24 in the Draft SEIR has been amended to discuss the effect of traffic fees on the project's contribution to cumulative traffic impacts on SR 68. By paying required TAMC and County traffic impact fees that would help pay for future improvements to traffic flow on SR 68, the project would not considerably contribute to a significant cumulative traffic impact. Please refer to Response 7.8 for further discussion.

Response 9.19

The commenter asserts that the project's contribution to a cumulative traffic impact on SR 68 was already fully mitigated as part of implementation of the larger Las Palmas Ranch development.

Please refer to Response 9.18 for discussion of the effect of prior mitigation on the project's contribution to a cumulative traffic impact on SR 68.

Response 9.20

The commenter reiterates that the prior implementation of traffic mitigation and payment of traffic impact fees as part of development under the LPRSP would reduce the project's traffic impacts on SR 68.

Please refer to Response 9.18 for discussion of the effect of prior mitigation on the project's traffic impacts on SR 68.

Response 9.21

The commenter disputes the Draft SEIR's finding that the project would have a significant and unavoidable impact to traffic conditions on SR 68 because the payment of County and TAMC impact fees would fully mitigate this impact.

Please refer to Response 9.18 for discussion of the effect of traffic impact fees on the significant and unavoidable impact to traffic conditions on SR 68.

Letter 10

County of Monterey RMA
% Joseph Sidor, RMA Associate Planner
Via Fax: 831-757-9516
Re: CEQA Comments , Riverview at Las Palmas Assisted Living Senior Facility
DSEIR PLN150372
SCH#2017031025

"The proposed project includes a Specific Plan Amendment, Use Permit, and Design Approval for the construction and operation of a senior assisted living facility and associated site improvements on an approximately 15.74-acre site at the location referenced above. The facility would consist of the following components: 13 single-story "casitas" providing 26 units and up to 42 beds, and ranging in size from approximately 1,500 to 3,800 square feet; a 43,400 square-foot, two-story assisted living facility consisting of 40 units and up to 52 beds; and a 38,800 square-foot, three-level memory care facility consisting of 39 units and up to 48 beds."

April 25, 2018

Dear Mr. Sidor,

I am commenting on behalf of the Highway 68 Coalition, and, from the perspective of one who followed the development at Las Palmas from its beginnings, then its re-beginnings, with the Fletchers in charge.

The Las Palmas "Ranch" subdivision went through many hearings and much deliberation as to the specific number of units that would be allowed there. This was all spelled out in a Specific Plan and analyzed in an EIR. 10.1
The Las Palmas Ranch subdivision was approved by the Board of Supervisors subject to 113 conditions of approval. (PC05623/PC07242)
It was also determined that the Las Palmas project would be built out in phases so that the numerous houses being built did not get ahead of the Conditions of Project approval and the Mitigation Measures that were applied to this project. Las Palmas I houses were built out quickly and sold fairly quickly.

During the development of Las Palmas II, approvals for approximately another 60 houses at a time showed up fairly regularly on the Board of Supervisors agendas.

Some of these houses were being built high in the hills where it wasn't initially envisioned houses would be built.

RECEIVED
APR 25 2018
MONTEREY COUNTY
RESOURCE MANAGEMENT AGENCY

Condition #91 stated "Consistent with Monterey County General Plan Policy 26.1.9.1, no building site shall be created with the potential for a ridgeline silhouette of any structure or roofline. All lots which created a ridgeline visible from Highway 68 or River Road visually sensitive corridors shall have a building envelope and zoning district height limitations designed (subject to the approval the Director of Planning and Building Inspection prior to the filing of the final map to eliminate potential ridgeline silhouetting."

Due to a lack of proper oversight on the Counties part these houses did get built in Las Palmas II, and it was decided by the Planning Commission that now that they are privately owned, and the owners did not want to cooperate, that there was no recourse. However, the visibility of the proposed Riverview at Las Palmas Senior Living Facility, if built would be very visible. This is another reason it should be denied. 10.2

According to Luke Connolly and the County RMA records, of all units allowed under the approved Specific Plan and entitlements granted, only three SFD remain unbuilt as of today. 10.3

A previous application processed by RMA, and approved, was for one large SFD on what is being called Parcel Q. That large SFD never got built and we assume this application's approval has timed out. Going by the numbers approved, that leaves three SFD that can be built on Parcel Q under the approved Specific Plan.

This previous project, for a large single family dwelling and accessory structures on Parcel Q was approved by the Zoning Administrator in October 2006. Here is the link to that staff report, approval, and conditions:

http://www.co.monterey.ca.us/planning/cca/za/2006/10-26-06/PLN060121ZA1.pdf

The applicants were Mr. and Mrs Persall. The PLN# was PLN060121
It is "Parcel Q" of the Las Palmas Subdivision Specific Plan, approved circa 1982.
APN: 139-211-035-000

The biggest traffic mitigation measure for the Las Palmas development was the Corral de Tierra Bypass. To this end, the developers of Las Palmas were asked to pay 10.66% of the estimated cost of this Bypass. The Corral de Tierra Bypass has

not been built although the Official Plan Lines remain, and the County owns some property in its alignment, paid for with taxpayer dollars.
Our question is: Regarding the 10.66% of the estimated cost contribution to the Bypass, where did the developer's money go? 10.4

The Las Palmas Ranch subdivision was one of the Monterey County subdivisions chosen for an Annual Status Report required by the Settlement Agreement in Case M47847 (PD010050) "Save our Peninsula v. County of Monterey" regarding audit of outstanding compliance issues. 10.5

For example: Condition 39. "A Homeowner's association shall be formed for the maintenance of roads, drainage facilities and open spaces. The document for formation of association shall be approved by the Director of Public Works, Director of Planning and Building Inspection, and the Flood Control District, prior to going a final map. CC&R's shall include provisions for a yearly report by a registered civil engineer monitoring impacts of drainage and maintenance of drainage facilities, to be approved by the Flood Control District. In addition, the Planning and Building Inspection Department will review the CC&R's and Homeowner association by-laws to be sure that they include wildlife corridor and open space maintenance to be paid for from the Homeowner Association fees."

Regarding this Compliance Issue, we ask, where are the annual drainage reports? Looking on Accela under PC05623-Phase I and PC07242-Phase II, there are no records found. Where are the wildlife corridors? Where are the records they are being maintained? Where are the records on Open Space maintenance?

As far as traffic impacts of this commercial proposal, it would introduce delivery trucks, staff arriving and leaving 24/7, visitors, medical, ambulances, and more… all going through the narrow streets of a residential subdivision, Las Palmas I. Levels of Service for every segment of Highway 68 from Toro Park to Highway 1 is LOS "F", and was designated as "F" in 1997 by the Transportation Agency for Monterey County. Even one more trip added to this is a significant impact. Don't you agree? 10.6

Thank you for the opportunity to comment.

Mike Weaver,
Chair, The Highway 68 Coalition

Letter 10

COMMENTER: Mike Weaver, Chair, Highway 68 Coalition

DATE: April 12, 2018

Responses 10.1

The commenter provides background information regarding the location and jurisdiction of the project site, and ridgeline development restrictions incorporated into the LPRSP conditions of approval.

The comment is noted but does not pertain to the adequacy of the Draft SEIR or CEQA process. Therefore, no further response is required.

Response 10.2

The commenter states that the project should be denied because it would be visible from SR 68 and River Road.

Please refer to Topical Response F. As described therein, the project would be visible from local roads and would also be visible from Subdivision residences. However, the project plans incorporate visual screening, and mitigation measures further reduce aesthetic impacts, including night sky light pollution, to a less than significant level.

Response 10.3

The commenter provides background on previous development proposed for LPRSP Parcel Q, and notes that the LPRSP traffic mitigation included payment of approximately 1 percent of a planned Corral de Tierra Bypass, which has not been built.

The comment does not pertain to the adequacy of the Draft SEIR or CEQA process. Therefore, no further response is required.

Response 10.4

The commenter asks about the status of a developer fee that was paid as mitigation for the LPRSP toward the Corral de Tierra Bypass.

The comment does not pertain to the adequacy of the Draft SEIR or CEQA process. Therefore, no further response is required.

Response 10.5

The commenter states that the LPHOA is required to submit various reports to the County demonstrating compliance with regulations for stormwater drainage and wildlife corridor/open space maintenance. The commenter states that these reports are not available on the County's public database.

The comment refers to prior construction of the Subdivision, rather than the proposed project. The comment does not pertain to the adequacy of the Draft SEIR or CEQA process. Therefore, no further response is required.

Response 10.6

The commenter states that the project would increase traffic in the Subdivision. The commenter states that even one additional trip on SR 68 is a significant impact.

The commenter's statement is correct. Please refer to Topical Response D for additional discussion regarding traffic.

Letter 11

From: Michael Weaver
To: Sidor, Joe (Joseph) x5262
Subject: CEQA Comments , Riverview at Las Palmas Assisted Living Senior Facility DSEIR PLN150372
Date: Wednesday, April 25, 2018 3:18:38 PM

Hello Mr. Sidor,

Please add the following to the previous three pages of comments I faxed to your attention earlier this afternoon.
Any questions, please call.

Thank you,
Mike Weaver
831-484-2243

……
……..

County of Monterey RMA

c/o Joseph Sidor, RMA Associate Planner
Via Fax: 831-757-9516
Re: CEQA Comments , Riverview at Las Palmas Assisted Living Senior Facility DSEIR PLN150372
SCH#2017031025

April 25, 2018 Dear Mr. Sidor,

The attached is from earlier work on Las Palmas Ranch subdivision resulting from the Settlement Agreement: Save our Peninsula v. County of Monterey

11.1

Many of the conditions of project approval may have been completed, however I cannot find information on the public access Accela. Please have someone confirm the following are in compliance and the necessary forms with evidence of compliance have been done, with dates, and uploaded to Accela.

Re: Riverview at Las Palmas
Las Palmas Ongoing Conditions
ALL CONDITIONS THAT REQUIRE ANNUAL REPORTS FOR THIS PROJECT

Condition #98.
(Ongoing. Annual report required prior to June 30 each year.)
Subdivider or homeowners' Association shall prepare a yearly status report which is to be submitted to the Monterey County Department of Planning and Building Inspection, and is due June 30 of each calendar year. This report shall indicate the ongoing maintenance and condition of all ongoing mitigation measures imposed as Conditions 7, 8, 9, 10, 15, 16, 21, 31, 37, 38, 39, 80, 99, and 102, 107 and 109, for each unit of the final Map filed prior to June 30 of that calendar year.
Condition #'s 7 – 11, 22, 31, 34, 39, 66 & 67. (Ongoing for each new phase.)
Condition #69.

Condition #70.
(Ongoing as needed.)
The subdivider shall be responsible for all changes and additions to treatment plant and disposal facilities necessary to meet the California Regional Water Quality Control Board prior to final acceptance.
(Ongoing as needed.)
-12-
The developer or Homeowner's Association will maintain all drainage easements in the subdivision. The CSA 72 will maintain all facilities and easements outside the subdivision that are dedicated for disposal of drainage.

Thank you,

Mike Weaver

Letter 11

COMMENTER: Mike Weaver, Chair, Highway 68 Coalition

DATE: April 25, 2018

Response 11.1

The commenter refers to the conditions of approval for the LPRSP. The commenter requests documentation that the conditions are being met.

The comment regards prior construction of the Subdivision, rather than the proposed project. Because the comment does not pertain to the adequacy of the Draft SEIR or CEQA process, no further response is required.

Letter 12

EXECUTIVE OFFICE

2716 OCEAN PARK BLVD., SUITE 3006
SANTA MONICA, CALIFORNIA 90405-5207
PHONE (310) 396-4514
FAX (310) 399-0062

April 25, 2018

Mr. Joseph Sidor
Monterey County Resource Management Agency – Planning
1441 Schilling Place, 2nd Floor
Salinas, CA 93901

Via Email to ceqacomments@co.monterey.ca.us and sidorj@co.monterey.ca.us

Via Facsimile to (831) 757-9516

Re: Draft SEIR for River View at Las Palmas Assisted Living Senior Facility (PLN 150372)

Dear Mr. Sidor,

Our company is the owner of the Ferrini Ranch property, which is adjacent to the proposed River View project. We always strive to be good neighbors and work cooperatively with owners of adjacent or proximate properties. Having said that, we do want to ensure that, in approving the River Project, the County takes the following into consideration: A) the current and imminent uses of the "mesa" portion of our site (PLN 040758), which involve both grazing and farming operations, including, without limitation, the cultivation of strawberry crops, lettuce, broccoli and other row crops; and B) the future residential and visitor center facilities that have been approved for that area. The potential impacts from our approved subdivision are fully described in the EIR and related approval documents for the Ferrini Ranch Project. The typical conditions, impacts and potential nuisances that can be associated with agricultural operations may include, but are not limited to, noise, odors, dust, light, insects, the ground or aerial application of fertilizers, pesticides, and herbicides, and the operation of pumps and machinery. These agricultural practices may occur at any time. Individual sensitivities to those practices can vary from person to person. 12.1

Due to the fact that the mesa is located just to the northeast of the proposed River View project, we ask that the County, in approving that project, impose measures or conditions of approval that ensure that the project will not result in any adverse effects on either the agricultural uses described above or the future residential and visitor-serving uses that have been approved for the Ferrini Property. Such conditions might, for example, require the project applicant to record an acknowledgement that agricultural activities are permitted by law on our property, that such activities may sometimes generate odors, dust, or chemical drift that can make their way onto the River View project site, and that such conditions do not rise to the level of enjoinable nuisances but rather must be accepted as a part of life in an agricultural region. We are anxious to avoid a scenario in which new residents on the River View 12.2

property object to our current agricultural activities and seek to get us to modify them. The same would hold true for any potential future uses approved under the Ferrini Ranch Project.

Provided that the County imposes measures or conditions on the River View project that are satisfactory to us, we would not have any opposition to the proposed project.

Please feel free to contact us with any questions or comments at the address shown below.

Sincerely,

DOMAIN CORPORATION

By: _____
Mark Kelton
Vice President

Contact information:

Domain Corporation
Attn: Mark Kelton
2716 Ocean Park Blvd., Suite 3006
Santa Monica, CA 90405
Email: markandray@ferriniranch.com

Letter 12

COMMENTER: Mark Kelton, Domain Corporation

DATE: April 25, 2018

Response 12.1

The commenter states that the Domain Corporation owns property adjacent to the project site. The commenter asks the County to consider the current agricultural uses of their property. The commenter notes that agriculture can cause impacts and nuisances such as odor and noise that some people may be sensitive to.

The Draft SEIR discusses impacts related to agriculture in Section 11.0, *Effects Not Found to be Significant*. As noted therein, the project site is not designated as farmland and would not impact existing or adjoining agricultural uses. However, page 11-1 of the Draft SEIR is revised as shown below to provide additional analysis related to the commenter's concerns.

> The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, or timberland. The Monterey County General Plan identifies the property as Grazing Land. The project site has been lightly grazed over the years, but only as part of a much larger grazing operation on adjoining properties. The project site is not of a sufficient size to be considered a viable agricultural unit for anything other than grazing. ~~The project will not have an impact on existing or adjoining agricultural uses, or result in the loss or conversion of forest land to non-forest use.~~
>
> The nearest crops to the project site are at a distance of approximately 330 feet, across River Road. Property adjacent to the west is used for cattle grazing. Development adjacent to farmland can create conflicts with agricultural operations in adjacent areas. The increase in the number of residents in the area would increase public access near existing agricultural areas, increasing the potential for conflicts, such as vandalism to farm equipment or fencing, and theft of crops. These effects can result in direct economic impacts to agricultural operations, potentially impacting the overall economic viability of continued agricultural operations. In addition, residents living adjacent to agricultural operations commonly cite odor nuisance impacts, noise from farm equipment, dust, and pesticide spraying as typical sources of conflict.
>
> The distance and landscaping buffer between the project site and the adjacent agricultural operations would minimize conflicts between the land uses. Specifically, mature trees would remain along River Road to buffer the project site against the effects of nearby agriculture such as pesticides and odors. Landscape buffering and topography would also minimize potential conflicts between the project and the surrounding grazing land. In addition, the County ensures a "right to farm" through Chapter 16.40, *Protection of Agricultural Activities*, of the Monterey County Municipal Code. Therein, an agricultural operation that is considered to be "properly operated" is inherently defined as a non-nuisance, and any transfer of real property within the County includes a "right to farm" notice provided to the purchaser. Therefore, the proposed project would not infringe on the farming rights of nearby agricultural operations, nor result in conversion or loss of farmland. The project would have a less than significant impact on agricultural or forest resources.

It should be noted that while the commenter states that their property includes cultivation of strawberry crops, lettuce, broccoli, and other row crops, there are no such activities in the vicinity of the project site.

Response 12.2

The commenter asks that their property's agricultural use is considered and protected by the County in the project's conditions of approval.

As noted in Response 12.1 above, the proposed project would not result in conflicts with adjacent agricultural operations. As such, no conditions of approval related to the Domain Corporation property are warranted.

Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas CA 93901

Letter 13

mailed March 10 2019 for staff/Plan Comm.

RE: River View at Las Palmas
Proposal for Senor Housing

Comments

I am a resident of Las Palmas 1. I have been steadfast in support of senior housing. I approve of development for senior housing on "Parcel Q", (i.e. River View at Las Palmas) 13.1

The need for senior housing in Monterey County increases year by year, as more people come to the area to retire. The need is democratic and the need cuts across all financial levels. The need is great; the supply is limited.

Re. Transportation

Environmental impact Reviews under CEQA must include proposed mitigation. Previously CEQA used LOS (Level of Service) (which commuters dubbed LOS-Loss of Speed) but that changed in 2013. Passage of SB743 mandated a change for developers to meet VMT (Vehicle Miles Traveled) rather than LOS. New standards for traffic evaluation were released in 2017 by CA Office of Planning and Research. 13.2

Because River View has limited parking onsite and a high number of employees, it seems necessary to utilize the VMY.

The LPR 1 HOA CC&Rs and HOA Board limit all parking for guests (of LPR residents) and the area West/NW of Las Palmas Road is and due to narrow roads, has always been no street parking. It is and has been so posted for many years.

The county needs to require that the developer solve (mitigate) this disparity by creative means, utilizing VMT. Bus, small van, bicycle, carpool use of UBER/LYFT, other means for transport of both employees AND special holiday visitors need consideration. Two current changes locally may prove helpful. 13.3

1. The two year and expensive project by CALTRAN to provide safe bicycle transport over the Salinas River (East and West) needs consideration and inclusion.
2. The recent closure of McShane Nursery (by nursery owner McShane) (and property owner Don Chapin) leaves a welcome amount of unused local parking space. (For use by bicycle and/or van, other means of commuting.)

Re: Transportation within LPR 1

"Parcel Q" is and has been a separate parcel, not part of the LPR 1 HOA. But ingress and egress are entitled to the parcel. 13.4

However, the developer will affect the residential area and residents. Specifically the short stretch of River Run Road and the two intersections of same. Small, low signs utilizing arrows are needed; both into, but also out from River View, which are most needed by new or occasional visitors. A stop sign at the intersection of Woodridge Court to River Run Road is necessary. Concern for pedestrians and bicycle riders are likewise needed. "The purpose of the VMT is to promote travel by... bicycle and walking." And to do so safely.

Nancy Iversen
21091 Old Ranch Ct.
Salinas CA 93908-1409

Letter 13

COMMENTER: Nancy Iversen

DATE: March 10, 2018

Response 13.1

The commenter states support for the project and notes that there is a great need for senior housing. The comment is noted and herewith shared with the County's decision makers for their consideration.

Response 13.2

The commenter states that Vehicle Miles Traveled (VMT) should be included in the project's traffic analysis.

The Draft SEIR analysis of the project's potential traffic impacts is based on existing standards for the local roadway system, which utilize level of service (LOS) standards. For an explanation of why VMT analysis is not included, refer to Topical Response D.

Response 13.3

The commenter describes parking limitations in the vicinity of the project site and recommends utilization of shared transportation for staff and visitors to the project site. The commenter makes note of two recent local changes that could improve the project's parking and transportation options: a Caltrans bicycle route project over the Salinas River, and the closure of McShane Nursery that leaves unused parking spaces.

As noted in Response 4.4, the project includes 106 parking spaces, which exceeds the required allotment. The Project Description lists the proposed parking spaces per facility, under the heading *Project Facilities*. The Draft SEIR does not include further discussion of parking because the project would provide a sufficient number of parking spaces, and parking is not a physical environmental impact requiring analysis or mitigation under CEQA. However, the information provided by the commenter regarding parking and transportation is herewith shared with County decision makers for their consideration.

Response 13.4

The commenter states that Parcel Q is not part of the Subdivision, but that ingress and egress are allowed through the Subdivision. The commenter states that River Run Road should have signage directing traffic and a stop sign at the intersection of Woodridge Court and River Run Road.

The comment's recommendation regarding signage is noted and herewith shared with the County's decision makers for their consideration. For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision.

Letter 14

Received by RMA-Planning
on March 14, 2018.

Sidor, Joe (Joseph) x5262

From: Marc Rosen <mrosen831@gmail.com>
Sent: Wednesday, March 14, 2018 9:14 AM
To: Sidor, Joe (Joseph) x5262
Subject: Comment on Draft EIR for Parcel Q development above Las Palmas ranch

TO: Joseph Sidor

RE: Plan # PLN15037

FROM: Marc Rosen 21036 Country Park Rd.

DATE: March 14, 2018

Greetings. We have been residents of Las Palmas Ranch for the past 28 years. Our home is located on the hillside below the proposed senior multiple housing development on Parcel Q. We are very concerned about the incompatibility of the proposed development for several reasons: 14.1

1) Lighting—Due to required 24 hour care, there is a likelihood that multiple lights will be on all night long. These lights will be visible to all of the homes below the development on Country Park Rd. and surrounding streets. This presents an unpleasant view shed and distraction for our neighborhood at night. 14.2

2) Truck Noise—Noise from constant traffic, including truck deliveries which have to access the proposed development from the end of Country Park Rd. will be a noisy disruption from our normally serene environment. This type of senior development is incompatible with our purely single family residential community. 14.3

3) Congestion—Because all traffic must enter Las Palmas Ranch and the Parcel Q development from River Rd., through our neighborhood, there is a likelihood that the additional traffic created by a senior housing facility could create congestion and delays in entering and leaving our neighborhood. Safety concerns for children playing on the adjacent field and in the streets are a serious issue. This type of development necessitates the employment of numerous people, visitors, deliveries, etc. 14.4

4) Wildlife Sanctuary—The hill above our neighborhood upon which the senior housing will be located is home to owls, hawks, deer, bobcats and other animals, all of which we see and hear frequently. This development, along with the lighting, traffic, noise, and congestion will disturb the wildlife. 14.5

5) Sirens—Senior developments often involve numerous medical emergencies which require ambulances and sirens. This kind of development is not compatible with a family oriented residential community. 14.6

6) Home Values—Due to the negative factors outlined above and others, our properties may become less desirable. As a result, values could decline. This is unfair to the neighborhood residents, for whom their homes are their largest investment. 14.7

This senior housing multi-residence development proposed for Parcel Q is incompatible with our family oriented quiet residential community for all of the reasons presented above. It should be opposed by the Planning and Building Department. If it has to be developed, it could be subdivided into three or four large building lots for single family homes. This would be a use which is compatible with the neighborhood and one that would minimize the issues outlined above. 14.8

Thank you,

Marc and Irene Rosen

Letter 14

COMMENTER: Mark and Irene Rosen

DATE: March 14, 2018

Response 14.1

The commenters express the opinion that the project is not compatible with surrounding land use.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 14.2

The commenters state that overnight lighting will impact the surrounding viewshed.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

Response 14.3

The commenters state that noise from truck traffic will be disruptive to the Subdivision.

Please refer to Topical Response H, which includes a discussion of the specific noise sources mentioned in the comment. As described therein, traffic noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 14.4

The commenters state that the project would result in traffic congestion and traffic-related safety impacts. Subdivision streets would all operate well within acceptable traffic volumes for residential streets, based on generally accepted level of service and traffic calming thresholds. The project would have a less than significant impact on traffic conditions in the Subdivision, and no mitigation would be required.

For a detailed discussion of these topics, please refer to Topical Response A and Topical Response D.

Response 14.5

The commenters state that the project site is home to wildlife that would be disturbed by the project.

Please refer to Topical Response G. As described therein, the project's impacts related to wildlife would be limited due to the size and placement of the project site. To reduce potential impacts to special status wildlife species, the Final SEIR includes mitigation measures, as listed in Section 4, *Amendments to the Draft SEIR*.

Response 14.6

The commenters state that noise from ambulance sirens will be disruptive to the Subdivision.

Please refer to Topical Response H, which includes a discussion of the specific noise sources mentioned in the comment. As described therein, traffic noise impacts would be less than

significant or less than significant with mitigation incorporated. Sirens from emergency vehicles would result in a short-term spike in ambient noise levels at nearby residences. However, there is an agreement in place that the Subdivision is a "no-siren zone." Additionally, the County Code exempts "emergency vehicles being operated by authorized personnel" from noise regulation. Therefore, emergency vehicles would have a less than significant impact on ambient noise.

Response 14.7

The commenters state that the project will decrease home values in the Subdivision.

Please refer to Topical Response C. As described therein, property value is not an environmental impact and therefore is not analyzed in the Draft SEIR.

Response 14.8

The commenters express the opinion that the project is not compatible with surrounding land use.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Letter 15

Received by RMA-Planning
on March 19, 2018.

Sidor, Joe (Joseph) x5262

From: JAKE OROZCO <orozcos8283@hotmail.com>
Sent: Sunday, March 18, 2018 10:44 AM
To: Sidor, Joe (Joseph) x5262
Subject: River View at Las Palmas: Assisted Living Senior Facility (PLN150372)

Mr. Sidor,

I am writing to notify you that I OPPOSE the construction of the senior care facility atop the hillside of the Las Palmas 1 Community. Although there are many, many reasons why I am in opposition, I will limit it to three: Noise, traffic, and roads. 15.1

One of the reasons why I moved into this community is the tranquility that living out of town provides. Construction crews building this facility will definitely disrupt the quiet, tranquil setting this area provides. Moreover, the oncoming shift workers, emergency vehicles, delivery trucks, and visitors that will be entering the facility once the facility is constructed will also cause disruption and increase noise to my neighborhood. A lot of traffic means a not-so-smooth entry into my neighborhood from River Road. 15.2

The increased traffic flow will cause jams/ bottleneck from River Road into Las Palmas. The security guard at the entrance works diligently to ensure only those authorized gain entry into Las Palmas. He will be overwhelmed checking-in every single unidentified person heading into that facility as well as into our neighborhoods. Also, why should our guard, whom we pay for with our HOA fees, have to work extra to admit, or deny, people that will not pay for his presence? Along with the problems of admittance and traffic flow, this facility will be intruding on families with children who use the roads for walks, bike riding, and other recreational activities. The park, where all the facility traffic will be passing, is a major hub for said families and pets. This will increase the risk of automobile-versus-person accidents. Aside from the regular flow of traffic from residents, the roads - some of which have no sidewalks- are used by children riding bikes, pulling wagons, or skateboarding. Such activities that living in the suburbs provides will be taken away because of the increased traffic flow the facility will produce. Increased traffic flow leads to road damage. 15.3

The care facility will cause deterioration in our (Las Palmas) roads. These roads are paid for and maintained by the residents through our HOA fees. The care facility, from initial planning, has always intended to use our entrance and roads as THEIR entrance into THEIR facility. From what I've heard already, they will not pay into HOA for road maintenance, nor will they pay extra for the magnitude of cars our security guard will have to check in on a daily basis. Nowhere did I agree to share my roads and my security with this facility, especially at our expense. 15.4

In summation, I strongly urge that you take into consideration the residents that this facility will be disrupting. Our concerns are uniform and we do not wish to sacrifice our remoteness, tranquility, and our roads - especially our entrance - with this facility. It's a great vision, but it needs to be envisioned far away from our community. 15.5

Sincerely,

Jacob Orozco
17555 Sugarmill Road

Sent from my iPhone

Letter 15

COMMENTER: Jacob Orozco

DATE: March 18, 2018

Response 15.1

The commenter states that they are opposed to the project. This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 15.2

The commenter states that the project will result in increased noise and traffic.

Please refer to Topical Response D and Topical Response H, which summarize the project's traffic and noise impacts. As described therein, traffic and noise impacts would be less than significant or less than significant with mitigation incorporated, with the exception of traffic impacts to SR 68, which would be significant and unavoidable.

Response 15.3

The commenter states that traffic caused by the project would overwhelm the Subdivision's private security gate operations. The commenter states that increased traffic would cause child safety risks and automobile accident risks.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 15.4

The commenter states that increased traffic caused by the project would lead to deterioration of Subdivision roads, and that the roads are privately paid for and maintained.

Please refer to Topical Response D for a discussion of impacts to road surfaces.

Response 15.5

The commenter reiterates their concerns and states that the project should be relocated.

This commenter's opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classifications , and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

Received by RMA-Planning
on March 20, 2018.

Letter 16

From: Paul and Rebecca Clifton
Address: 21180 Old Ranch Court

Date: 3/19/2018

To: Sidorj@co.monterey.ca.us ,

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us

roygobets@aol.com , Roy Gobets 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Joe,

We write regarding the above development. We have examined the planned area and know the site well. We wish to strongly object to the development of the proposed facility. 16.1

We feel that the proposed facility will have a negative impact on Las Palmas 1 overwhelming it with traffic, noise, run off, and safety/security issues. In addition, our view is that this project does not give respect to the locals that live here, the beauty of the environment, or the wildlife habitat that surrounds us. 16.2

There are many other more suitable and less impactful properties within Monterey County for such a development. We strongly urge the developer to find an alternative area for this proposed facility.

As you are the decision makers, we hope you can help the locals of Las Palmas 1 towards a favorable outcome.

Respectfully,

Paul and Rebecca Clifton

Letter 16

COMMENTER: Paul and Rebecca Clifton

DATE: March 19, 2018

Response 16.1

The commenters state that they object to the project.

This commenter's opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Response 16.2

The commenters state that the project will have impacts related to traffic, noise, hydrology, safety, aesthetics, and wildlife. The commenter states that the project is disrespectful to the neighboring residents and recommends that it be relocated.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classifications , and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

For a discussion of the other issues mentioned in the comment, refer to Topical Responses A, D, E, G, and H. As described therein, the project would have a significant and unavoidable impact on traffic conditions on SR 68. All other impacts would be less than significant or less than significant with mitigation incorporated.

Letter 17

David and Céline M. Dalby
21024 Country Park Road
Salinas, CA 93908

RECEIVED
APR 20 2018
BUILDING SERVICES DEPARTMENT
MONTEREY COUNTY

March 19, 2018

Joseph Sidor, Associate Planner
Monterey County RMA - Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
Brandon Swanson, Planning Manager
Monterey Planning Commission

Messrs. Sidor and Swanson

RE: RVPL Draft SEIR River View at Las Palmas (PLN# 150372)

We wish to firmly oppose the above proposed commercial project for several important planning reasons. However we generally support senior and health support businesses. 17.1

I. Wrong Access Location

It clashes with the original Las Palmas I family residential community. The road easement to this residentially zoned parcel will be overburdened by heavy construction equipment for a business project of that magnitude. The 329 resident households use the same access out and in each day for work, school, and errands to the city. 17.2

II. Traffic

Afterwards, we will lose our quiet, peaceful neighborhood to a 24/7 business enterprise, requiring our access for all visitors, employees, service providers and suppliers. The Las Palmas I community has put a lot of effort and expense in being pro active in adhering to the original family subdivision Plan, maintaining our common roads, parks , landscaping etc. as per our bylaws. This business is not part of our HOA and has not been co-operative with land use issues relating to Parcel Q. 17.3

III. Security and Safety

Due to our community's remote access for local law enforcement, we took the initiative to enhance personal and property security with limited vehicular access for 8 hours and random mobile security off peak hours. We also have an active Neighborhood Watch Chapter - these efforts would be nullified. Ss you may be aware for this area of Salinas, there is a shortage of manpower for law enforcement, the Sheriff department can attest to our low call outs to our neighborhood compared to other nearby areas due to our security diligence. There would be no guarantee to our community security and family environment values would be severely compromised. In an emergency situation of fire or flooding, slides and as we know the terrain and recent events in our nearby locations the evacuation of our community - adding the residents and patients of the Assisted Living complex would be problematic at best. 17.4

IV. Zoning

The above project is non-residential and requires services that are available closer to a local hospital with professional help and medical services already in place. 17.5

We request that you carefully address these issues as we feel this project does not comply with this residential community as per the County Plan bearing in mind that other locations are available and more suitable for the developer's requirements. We wish for you to consider and reply to all the above items.

Sincerely,

C. M. Dalby

David and Céline M. Dalby

Letter 17

COMMENTER: David and Céline M. Dalby

DATE: March 19, 2018

Response 17.1

The commenters state that they are opposed to the proposed project.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Response 17.2

The commenters state that the access roads would be overburdened by the project construction traffic.

Please refer to Topical Response D for a discussion of traffic generated by the project's construction phase. As described therein, mitigation is required to reduce impacts to road surfaces to a less than significant level. Traffic impacts to Subdivision roads are less than significant or less than significant with mitigation incorporated.

Response 17.3

The commenters state that the project would impact the quiet and peaceful neighborhood of the Las Palmas community due to increased traffic caused by the project.

As described in Topical Response C, neighborhood fit and quality of life are not environmental impacts and are not directly analyzed in the Draft SEIR. The Draft SEIR does include analysis of traffic and noise impacts. All impacts were determined to be less than significant or less than significant with mitigation incorporated, with the exception of traffic impacts to SR 68, which would be significant and unavoidable.

Response 17.4

The commenters state that the project would compromise the Subdivision's security and emergency preparedness.

Please refer to Topical Response A for a discussion of the project's impacts on security operations, and Topical Response D for a discussion of impacts on emergency evacuation. The project would not result in a significant impact on police service or emergency preparedness within the Subdivision. Regarding the Subdivision's private security operations, an agreement would be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Response 17.5

The commenters state that the project should be developed closer to a hospital.

The proposed location offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access. Salinas Valley Memorial Healthcare, the nearest hospital to the project site, is approximately five miles from the project site. For further discussion of the project's siting and land use compatibility, refer to Topical Response C.

Letter 18

Received by RMA-Planning
on March 20, 2018.

Sidor, Joe (Joseph) x5262

From: adam kirk <kirkadam@sbcglobal.net>
Sent: Monday, March 19, 2018 6:04 PM
To: Sidor, Joe (Joseph) x5262
Subject: RVPL draft PLN#150372

Hi Joe,

I'm very upset that there is a possibility of 300+ vehicles traveling in and out of Las Palmas 1 daily, putting my family and I in danger. 18.1
I wish the Developer could find a more suitable entrance, possible down near the Highway 68 exit, also , when I bought here I was told only 3 residential housing units could be put in that lot (any truth to that?) 18.2

Thanks for your help,
Adam & Takako Kirk.

Letter 18

COMMENTER: Adam and Takako Kirk

DATE: March 19, 2018

Response 18.1

The commenters state that they are concerned about traffic caused by the project and resulting safety issues. The commenters state that a different entry point to the project site should be established.

Please refer to Topical Response A for discussion of safety and security and to Topical Response D for a discussion of traffic impacts. As described therein, the project would not result in significant traffic or traffic safety impacts to Subdivision roads.

Response 18.2

The commenters ask if the project site has a development limit of three residential housing units.

The LPRSP, Toro Area Plan, and Monterey County General Plan designate the site as Medium Density Residential (MDR). The MDR zoning allows for certain uses, such as the proposed project, that are not classified as residential, and are therefore not subject to limitations that specifically apply to housing units. For a full discussion of this issue, refer to Topical Response C.

Received by RMA-Planning
on March 19, 2018.

Letter 19

Rendell Requiro and Francoise Mc Avinchey
17563 Winding Creek Road
Salinas, CA 93908

March 19, 2018

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us

roygobets@aol.com , Roy Gobets 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Joe,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. 19.1

I strongly urge the developer to find alternate venue and access for his proposed facility. 19.2

Please respond to the issues I listed above in writing.

Respectfully,

Rendell and Francoise Mc Avinchey

Letter 19

COMMENTER: Rendell Requiro and Francoise Mc Avinchey

DATE: March 19, 2018

Response 19.1

The commenters state that they are opposed to the proposed project due to concerns about traffic, safety, and land use incompatibility.

This commenter's opposition to the project is noted and herewith shared with the County's decision makers for their consideration. Refer to Topical Responses A, C, and D for discussion of the issues mentioned in the comment.

Response 19.2

The commenters urge the developer to find an alternate location for the project.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

RECEIVED
MAR 22 2018
Monterey County RMA

Letter 20

From: Russell Schwanz

Address: 21045 Country Park RD
Salinas, CA 93908
831-455-9172
russellschwanz@att.net

Date: 3/19/2018

To: (Sidorj@co.monterey.ca.us),
Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Sir

I am deeply concerned about the proposed project and recommend relocating it. 20.1

Please consider the following:

1. The current Las Palmas 1 neighborhood frequently has strong winds. I view the proposed site from my front yard. I notice strong winds there frequently. This happens in all seasons, including summer and fall. 20.2

2. The area between Country Park Rd, Sugarmill Rd, Old Ranch Ct, and Woodridge Ct lie basically in a canyon. With the exceptions of the houses themselves, this area has an abundance of dry vegetation in summer and has very steep hills. The proposed building site lies on a ridge adjacent to this area. The proposed site is completely surrounded by dry vegetation.

3. The proposed site has very limited road access. Even under ideal emergency conditions the proposed project would be difficult to evacuate. 20.3

4. If a wildfire were to start, the residents of the proposed site could be completely cut off. Being located on the top of a ridge with steep sides a fire's heat could be directed at this site. The results could be a significant loss of life.

5. Further complicating the situation, Woodridge Rd is a constriction point. All current residents, plus any from the proposed project and any emergency vehicles coming in would all be funneled though a single intersection. Given an emergency evacuation, the existence of this project could also put current residents (in the area described in item 2 above) at greater risk. Evacuation would be significantly slowed.

6. This area of Monterey County is very vulnerable to wildfires.

This is a very important time for this project. Letting the project proceed at this location could result in a significant loss of life in the future. We need to thoughtfully and respectfully prevent a significant loss of life.

Please respond to the issues above in writing.

Respectfully,

X Russell D. Schwartz

Letter 20

COMMENTER: Russell Schwanz

DATE: March 19, 2018

Response 20.1

The commenter states that they are concerned about the project and recommend relocating it.

The commenter's concern is noted. As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

Response 20.2

The commenter describes details related to the climate and vegetation in the vicinity of the project site.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, refer to Topical Response F for a discussion of visual impacts, and Topical Response B for a discussion of wildfire hazards.

Response 20.3

The commenter states that the project site has limited road access and that an emergency evacuation would be difficult, as all traffic would be funneled through a single intersection. The commenter states that Monterey County is vulnerable to wildfires, and that the project could result in loss of life.

For discussion of emergency evacuation, please refer to Topical Response D. As noted therein, mitigation is required to reduce impacts related to emergency evacuation to a less than significant level.

For a discussion of wildfire impacts, please refer to Topical Response B, which includes analysis added to the Final SEIR addressing wildfire hazards. Impacts related to wildfire and fire protection would be less than significant.

Letter 21

March 20, 2018

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901

Dear Mr. Sidor,

I am an eighteen-year resident of Las Palmas, Phase One. My family and I moved here from a rental home on the cooler, more congested Monterey Peninsula, seeking the warmer weather and tranquil setting of River Road in south Salinas. I am writing to express my concern that the environment that we currently enjoy will be sorely impacted by the proposed nursing facility in our immediate neighborhood. I know that I speak for many in my community when I say that the increased traffic and noise will detract from our quality of life. Should the project proceed, I fear that I may be forced to sell and move elsewhere—hardly an outcome that I envisioned when settling here in July of 2000. 21.1

Please consider my words seriously as you and your associates weigh this important decision.

Respectfully yours,

Christian Dreyer Mihoko Dreyer

Christian and Mihoko Dreyer
17550 Sugarmill Road
Salinas, CA 93908
(831) 905-5013
dreyer4@aol.com

RECEIVED
MAR 23 2018
Monterey County, RMA

Letter 21

COMMENTER: Christian and Mihoko Dreyer

DATE: March 20, 2018

Response 21.1

The commenters state that they are concerned about traffic, noise, and quality of life impacts resulting from the project.

For discussion of the concerns mentioned in the comment, refer to Topical Response C, Topical Response D, and Topical Response H. As noted in Topical Response D, the project would not result in a substantial increase in traffic within the Subdivision. As described in Topical Response H, traffic noise impacts would be less than significant or less than significant with mitigation incorporated, with the exception of traffic impacts to SR 68, which would be significant and unavoidable.

Letter 22

Received by RMA-Planning
on March 20, 2018.

Sidor, Joe (Joseph) x5262

From: Scott Porter <srporter@yahoo.com>
Sent: Tuesday, March 20, 2018 3:59 PM
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334
Subject: Proposed Development of Riverview at Las Palmas (PLN#150372) RVPL Draft SEIR (Corrected)

Please Note; This email contains some very slight corrections and supersedes the email sent earlier today. Please disregard earlier email.

Thank you. Scott Porter

March 20, 2018

Mr. Joseph Sidor, Associate Planner
Mr. Brandon Swanson, Planning Manager
Monterey County Planning Comission

Messrs. Sidor and Mr. Swanson;

I write as a resident of Las Palmas I. I am opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372)

22.1

I generally favor development of residential care and nursing facilities as part of a community. However this large proposed non-residential development is inconsistent with the peaceful rural residential nature of the Las Palmas community.

I. Traffic

Traffic is a particular problem. The proposed non-residential development would bring commercial vehicles -- food deliveries, medical waste, trash, linen, etc, -- and numerous employee vehicles through a narrow street originally designed for residential traffic. This constant and increased traffic would irrevocably alter the peaceful nature of the community. Las Palmas is a quiet community -- children playing, people walking dogs, and residents generally enjoying the peaceful nature of the rural neighborhood. There is no compatible way for this development and attendant traffic to use the existing entrance to our neighborhood and not destroy the peaceful nature of the neighborhood.

22.2

II. Security

Security of the neighborhood would be compromised by permanently opening the neighborhood to this non-residential development. As a community we have taken steps to preserve the security of the neighborhood including installing gates and employing security guards to check all incoming traffic. Residents are secure in knowing who comes into our community. This proposed large non-residential development would open the neighborhood to incessant traffic, coming and going

22.3

throughout the daytime and evening. There is no way to regulate this traffic and guarantee the security of the neighborhood. This is a real concern.

III. The Proposed Non Residential Development is Inconsistent with the Existing Residential Community

Under The Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood. Residents purchased their homes and built their lives and their community in reliance on Plans that provided an opportunity to live in and enjoy a rural residential neighborhood. 22.4

This parcel is zoned "medium density residential," at 2.61 units per acre. Under the Las Palmas Plan **this parcel was specifically approved for 8 units total. The developer now seeks a "conditional use permit" to allow development of a non-residential facility with a total of 105 units.** This is inconsistent with The Las Palmas and Monterey County Plans.

The developer seeks to circumvent these plans by requesting an amendment for a non-residential use. Specifically, the developer asks you approve an amendment with the following language;

> **. . . Assisted living facilities are not considered residential units . . . . . (and should not be) . . . . subject to the . . . . residential limitation of the (Las Palmas) Plan. An assisted living facility is . . . . not a residential use, because it does not operate or function in a manner like independent residential units.**

Very simply, the developer is asking for approval of non-residential use in a planned residential community.

Las Palmas is a highly desirable ***residential community.*** Residents have invested here based on the rural nature of this community under the approved Las Palmas Plan. Residents have relied on the approved Las Palmas Plan and its resulting development. The proposed development is a non-residential use. The proposed Assisted Living Facility does not operate or function in a manner consistent with the Las Palmas Plan, nor the rural nature of the community.

To approve this amendment to the Las Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community.

I request you please carefully consider these issues when considering this proposed development. This proposed non-residential development is inconsistent with the existing residential community, and should not be approved.

Thank you for your consideration.

Respectfully submitted.

s/_____

Scott Porter
21440 Riverview Ct.

Salinas CA 93908
(831) 214-0686

Letter 22

COMMENTER: Scott Porter

DATE: March 20, 2018

Response 22.1

The commenter states that they are opposed to the project and that it is inconsistent with the Las Palmas community.

This commenter's opposition to the project is noted and herewith shared with the County's decision makers for their consideration. For discussion of land use compatibility, refer to Topical Response C.

Response 22.2

The commenter states that the project would increase traffic in the Subdivision, diminishing the existing peace and quiet.

For a discussion of traffic impacts, refer to Topical Response D. As described therein, the project would not result in a significant impact to traffic within the Subdivision. For discussion of quality of life impacts refer to Topical Response C. For a discussion of noise impacts, refer to Topical Response H. As described therein, traffic noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 22.3

The commenter states that the project would compromise the Subdivision's security by increasing traffic and visitors through the Subdivision.

Please refer to Topical Response A. As noted therein, the Draft SEIR has been revised to clarify the project applicant's responsibilities related to the Subdivision's private security operations.

Response 22.4

The commenter states that the project is inconsistent with the existing residential community. The commenter discusses zoning and states that the developer is seeking approval for non-residential development in a residential community. The commenter states that the project would destroy the rural residential nature of the existing community.

The project is a senior assisted living facility. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. For more detail, refer to Topical Response C.

Letter 23

Received by RMA-Planning
on March 20, 2018.

Sidor, Joe (Joseph) x5262

From: Gayle Todd <gayletodd@gmail.com>
Sent: Tuesday, March 20, 2018 4:38 PM
To: Sidor, Joe (Joseph) x5262; swansonb@monterey.ca.us
Subject: Proposed Development of Riverview at Las Palmas (PLN#150372) RVPL Draft SEIR

March 20, 2018

Mr. Joseph Sidor, Associate Planner
Mr. Brandon Swanson, Planning Manager
Monterey County Planning Comission

Messrs. Sidor and Mr. Swanson; We write as residents of Las Palmas I for 25 years. We am opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372)

23.1

We generally favor development of residential care and nursing facilities as part of a community. However this large proposed non-residential development is inconsistent with the peaceful rural residential nature of the Las Palmas community. I am surprised this wasn't proposed to be built on Ft Ord land.

I. Traffic

Traffic is a particular problem. The proposed non-residential development would bring commercial vehicles -- food deliveries, medical waste, trash, linen, etc, -- and numerous employee vehicles through a narrow street originally designed for residential traffic. This constant and increased traffic would irrevocably alter the peaceful nature of the community. Las Palmas is a quiet community -- children playing, people walking dogs, and residents generally enjoying the peaceful nature of the rural neighborhood. There is no compatible way for this development and attendant traffic to use the existing entrance to our neighborhood and not destroy the peaceful nature of the neighborhood. If it were approved the entry and exit must be on River Road!

II. Security

Security of the neighborhood would be compromised by permanently opening the neighborhood to this non-residential development. As a community we implemented a very successful security plan. We have installed gates and employisecurity guards to check all incoming traffic. Residents are secure in knowing who comes into our community. This proposed large non-residential development would open the neighborhood to incessant traffic, coming and goi g 24 hours a day. There is no way to regulate this traffic and guarantee the security of the neighborhood. This is a real concern. Residents pay for this security and it should NOT be compromised!

III. The Proposed Development is Non Residential and Inconsistent with the Existing Residential Community

Under The Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood. Residents purchased their homes and built their lives and their community in reliance on Plans that provided an opportunity to live in and enjoy a rural residential neighborhood.

This parcel is zoned "medium density residential," at 2.61 units per acre. Under the Las Palmas Plan this parcel was specifically approved for * units total. The developer now seeks a "conditional use permit" to allow ***development of a non-residential facility with a total of 105 units***. This is inconsistent with The Las Palmas and Monterey County Plans.

The developer seeks to circumvent these plans by requesting an amendment for a non-residential use. Specifically, the developer asks you to approve an amendment with the following language;

> **. . . Assisted living facilities are not considered residential units . . . . . (and should not be) . . . . subject to the . . . . residential limitation of the (Las Palmas) Plan. An assisted living facility is . . . . not a residential use, because it does not operate or function in a manner like independent residential units.**

Very simply, the developer is asking for approval of non-residential use in a planned residential community.

Las Palmas is a highly desirable ***residential community***. Residents have invested here based on the rural nature of this community under the approved Las Palmas Plan. Residents have relied on the approved Las Palmas Plan and its resulting development. The proposed development is a non-residential use. The proposed Assisted Living Facility does not operate or function in a manner consistent with the Las Palmas Plan, nor the rural nature of the community.

To approve this amendment to the Las Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community.

We request you please carefully consider these issues when considering this proposed development. The developer purchased this land for pennies on the dollar and now his greed is rearing it's ugly head with no consideration of those who live here. This proposed non-residential development is inconsistent with the existing residential community, and should not be approved.

Thank you for your consideration.

Respectfully submitted.

Robert Scranton & Gayle Todd
--
Sent from Gmail Mobile

Letter 23

COMMENTER: Robert Scranton and Gayle Todd

DATE: March 20, 2018

Response 23.1

The content of this letter is the same as the content of Letter 22. Please refer to Responses 22.1 through 22.4 above.

Date: March 21, 2018

Letter 24

To: Jospeh Sidor, Associate Planner

Monterey County RMA-Planning, Second Floor

1441 Schilling Place, Salinas, CA 93901

Cc: Brandon Swanson, Planning Manager

Roy Gobets 21056 Country Park Road, Salinas, CA 93908

Subject: RVLP Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Mr Sidor,

My name is Julianne Harris. I am a home owner currently living in Las Palmas Phase 1 in Salinas, California. I am writing this letter because I have concerns about the new proposed development in Las Palmas known as Riverview at Las Palmas (PLN#50372).

24.1

With this senior housing development plan, there will be an increase of noise and traffic due to on-going medical professionals, emergency responders, deliveries, friends and families having to care and provide for these seniors 24 hours 7 days a week. Therefore it should be required to have its own entrance and gate guard, separate from Las Palmas. This will ensure that our established community parks, the environment and our roads will not be affected in any way by this commercial development.

Las Palmas was established as a family neighborhood – a safe place to raise children, grow and make life time memories, a home for a life time. This commercial project, if allowed to use our community in any way, will greatly change our family homes and lifestyle.

Lastly, the impact of the lighting this commercial business will require will have a negative effect on the neighborhood and the environment.

Sincerely,

Julianne Harris

17663 Riverbend Rd

Salinas, CA 93908

Letter 24

COMMENTER: Julianne Harris

DATE: March 21, 2018

Response 24.1

The commenter states that they are concerned about the project's impacts on noise, traffic, quality of life, and environmental impacts of lighting. The commenter requests the project have a separate entry from Las Palmas.

Please refer to Topical Response D for a discussion of a separate entry for the project. As noted therein, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

Please refer to Topical Response C. As described therein, quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

The Draft SEIR includes an analysis of noise impacts, which were determined to be less than significant or less than significant with mitigation incorporated. For a discussion of noise, refer to Topical Response H.

Letter 25

Received by RMA-Planning
on March 21, 2018.

Sidor, Joe (Joseph) x5262

From: Stephen Hurst <sfhurst@outlook.com>
Sent: Wednesday, March 21, 2018 4:01 PM
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; roygobets@aol.com
Subject: River View at Las Palmas Assisted Living Senior Facility Subsequent Environmental Impact Report (SEIR) (PLN#150372)

March 21, 2018

Joseph Sidor, Associate Planner
Monterey County RMA – Planning Second Floor
1441 Schilling Place
Salinas, CA 93901

Dear Mr Sidor

We are residents of the Las Palmas 1 sub-division. We recently received a copy of the River View at Las Palmas Assisted Living Senior Facility Draft Subsequent Environmental Impact Report (SEIR). Having reviewed the Report we view with concern the scope of the project, its impact on my quality of life and the value of our property. Our specific comments regarding the Report are: 25.1

Page 2 of Overview

No link to LIB150361 Traffic Report
No Link to LIB160001 Traffic Report 25.2

Section 3, Environmental Settings

A review of the site plan would seem to indicate the only entrance to, and exit from, the facility would be through Las Palmas 1 via Las Palmas Road, River Run Road and Woodbridge Court. There are no alternate routes in and out of the facility indicate on the site plan. Any number of environmental catastrophes, like an earthquake or forest fire, could block the main entrance through Las Palmas 1. An alternative route for emergency vehicles to reach trapped residents and patients would seem to be an absolutely essential part of the project plan. 25.3

Of particular concern is the admitted (Section 8.1) concern with the increased likelihood of future flooding. The developer dismisses this concern in Section 11.6 by stating, "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." That may very well be true for the facility itself, but not for the only route designated for entrance and exit. As late as 1990 Las Palmas Road, River Run Road and Woodbridge Court were all completely covered with enough water to block all vehicular traffic in and out of Las Palmas 1 25.4

Section 9, Transportation & Traffic

The report contains a detailed analysis of the possible impact of increased traffic on Highway 68, Reservation Road and River Road, but there is no mention anywhere in the study of an analysis of the traffic impact on the streets of Las Palmas 1. Visitors, medical supply delivery and ambulance calls will dramatically increase traffic and noise in the housing area surrounding the development. It is anticipated there will backups at the single entry to Las Palmas 1 that will block access to our property. 25.5

The security point is manned from 8:00a – 4:00p. Prior to the development of Parcel Q this was sufficient to keep out unwanted persons and vehicles during the period when homes may be unoccupied and most vulnerable to theft. Increased crime during this period was the reason a security guard was added at the main entrance. Once Parcel Q is developed it would be anticipated that visitor traffic and the associated noise will increase dramatically after 4:00p, and with it unwanted persons and vehicles in Las Palmas 1.

Section 14.4, Growth Inducing

At the bottom of the second paragraph of this section it states, "The proposed project is not a residential use under the County codes or the specific plan and the project does not provide dwelling units that will operate or function as independent units." This is a complete contradiction to developer's stated plan to build 13 casitas designed for couples requiring moderate service, like meals and transportation. They are, in fact, single family homes with parking for each residence. 25.6

Sec 17, Alternatives

Again, the traffic impact discussed in Alternative 2 only addresses the impact on Highway 68 and River Road. There is no mention of the impact on the existing streets of Las Palmas 1. 25.7

In general, the Draft Subsequent Environmental Impact Report (SEIR) dismisses without comment or fails to address any environmental impact on the residents of Las Palmas 1. Given the concerns detailed above we strongly urge the developer to seek and alternative location for this project.

Respectfully submitted,

Stephen and Susan Hurst
17543 Sugarmill Road
Salinas, CA 93908
831.917.9296
sfhurst@outlook.com

Letter 25

COMMENTER: Stephen and Susan Hurst

DATE: March 21, 2018

Response 25.1

The commenters state that they are concerned about the project.

The commenters' specific concerns are addressed below.

Response 25.2

The commenters state that links to traffic reports were not provided.

The traffic analysis prepared for the proposed is included as Appendix D of the Draft SEIR. For additional traffic analysis prepared for the Final SEIR, refer to Topical Response D.

Response 25.3

The commenters state that they are concerned about the project having only one entrance, and no alternative route for emergency vehicles. The commenters voice concern about environmental catastrophes that would necessitate an emergency evacuation.

Please refer to Topical Response D for a discussion of emergency evacuation routes. As described therein, mitigation is required to improve emergency access and evacuation to and from the site. For a discussion of fire safety, refer to Topical Response B. For a discussion of geologic hazards, refer to Topical Response E. As described therein, the project would not result in significant impacts related to natural disasters.

Response 25.4

The commenter states that the project could contribute to flooding of its entrance road.

Please refer to Topical Response E for a discussion of stormwater drainage. As noted therein, the project would not result in significant impacts related to flooding. Stormwater drainage of the project site would prevent flooding of the site's entrance. For a discussion of land use rights related to the project's potential connection to the Subdivision's drainage system, refer to Topical Response I.

Response 25.5

The commenter states that project would increase traffic in the Subdivision. The commenter describes security concerns associated with increased traffic and visitors in the Subdivision.

Topical Response D for a discussion of traffic impacts. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable. For a discussion of safety and security issues, refer to Topical Response A. For a discussion of the project applicant's responsibilities regarding private security service, refer to Topical Response I.

Response 25.6

The commenter states that the proposed project is residential, and that the Draft SEIR inaccurately describes it otherwise.

The project is a senior assisted living facility. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. For more detail, refer to Topical Response C.

Response 25.7

The commenter states that the Draft SEIR Alternatives Section does not address traffic impacts on the Subdivision.

The Draft SEIR states that Alternative 2: No Project/Minimum Use would result in a lesser increase in traffic compared to the proposed project. For discussion of the proposed project's traffic impacts, refer to Topical Response D.

Letter 26

RECEIVED
MAR 30 2018
Monterey County RMA

From: WILBUR & CORDELIA LEE Date: 03/21/2018

Address: 17589 RIVER RUN ROAD, SALINAS, CA 93908

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us

roygobets@aol.com , Roy Gobets 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Joe,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. 26.1

I strongly urge the developer to find alternate venue and access for his proposed facility.

Please respond to the issues I listed above in writing.

Respectfully,

X Cordelia Lee

PLN 150372

Letter 26

COMMENTER: Wilbur and Cordelia Lee

DATE: March 21, 2018

Response 26.1

The commenter states that they are concerned about the project and urge the developer to find an alternate site. The commenter expresses concerns related to traffic, safety, and land use incompatibility.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Letter 27

17585 River Run Road
Salinas, CA 93908
March 20, 2018

Joseph Sidor, Associate Planner
Monterey County RMA-Planning/Second Floor
1441 Schilling Place
Salinas, CA 93901

Dear Mr. Sidor,

I am a new homeowner in the Las Palmas One residential development. It has been brought to my attention that there is a proposed development, referenced by the title *Riverview*, that will soon be presented to the Monterey County Board of Supervisors for approval. This proposal is noted as PLN #150372.

Riverview, in my opinion, will negatively impact the quiet quality of life treasured by the those who live in Las Palmas One. 27.1

If this proposed development is able to proceed the traffic in Las Palmas One will increase, the number of residential units will increase, and the precedent of continued commercial development will increase. These three factors will undermine the quiet environment in which Las Palmas One currently offers its residents and it may eventually and sadly downgrade the value of their homes. 27.2

I further understand that most of the residents in Las Palmas One were unaware that the zoning in the Las Palmas One area would be--or could be--changed when they purchased their homes. (I certainly was.) 27.3

I am know you will note both the positive and negative impacts the proposed Riverview development may have on Las Palmas One as you prepare information needed to address any questions the Board of Supervisors may have about this development.

The objective of my letter is to make you aware that many residents in Las Palmas One are wary of the impact the Riverview development will have upon their neighborhood.

I would appreciate a written response to the issues I have noted above.

Sincerely,

Susan Paoli

RECEIVED
MAR 23 2018
Monterey County RMA

Letter 27

COMMENTER: Susan Paoli

DATE: March 23, 2018

Response 27.1

The commenter states that the proposed project would impact the quality of life of nearby residents.

Please refer to Topical Response C. As described therein, quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

Response 27.2

The commenter states that the proposed project would cause impacts on traffic and property values, and would increase commercial development in the area.

As noted in Topical Response C, property value is not analyzed in the Draft SEIR because it is not an environmental impact under CEQA.

Regarding traffic impacts, refer to Topical Response D. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

The comment regarding commercial development is noted. For related discussion, refer to Section 14.0, *Growth Inducing*, of the Draft SEIR. As noted therein, the project would not result in a direct population increase.

Response 27.3

The commenter states that residents of the Subdivision were unaware that nearby zoning could change to allow for new projects.

The project site is zoned Medium Density Residential. While the proposed project would not change this zoning, the project does include an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. For further discussion of this issue, refer to Topical Response. C.

Letter 28

RECEIVED
MAR 30 2018
Monterey County RMA

March 25, 2018

Mr. Joseph Sidor, Associate Planner
Mr. Brandon Swanson, Planning Manager
Monterey County Planning Commission

Dear Sirs,

We are original owners of our home (28 years) at Las Palmas 1. My husband worked for the Department of Environmental Health in Santa Cruz and I was an Analyst for the Monterey County Health Department before becoming a consultant and instructor at Hartnell Community College and CSUMB. We are both strongly opposed to the **Proposed Development of Riverview at Las Palmas (PLN#150372)**. The proposed development is totally inconsistent with our rural, residential community for the following reasons: 28.1

1. **Safety and Security**
Our community has taken steps to preserve our neighborhood security by employing security guards to check all incoming traffic, installing gates, and implementing a Neighborhood Watch program. There are many "new" families who have moved in with little children, feeling secure that our neighborhood is safe. We are very concerned that the proposed development would allow constant traffic throughout the day and evening with no way to regulate the security of our neighborhood. Currently, there are many families with young children who feel free to ride their bicycles and play without fear of outside visitors or unauthorized persons driving through the area. 28.2

In addition, with the proposed number of units and staff, it is highly probably that traffic would be backed up onto River Road which is a safety hazard. People tend to speed along this road and there have already been fatalities as a result.

2. **Emergency evacuation**
We are all too aware of the recent tragic fires and floods throughout California which caused folks to evacuate with little notice. There was huge property loss and loss of life. In the terrible event of earthquake, fire or flood, it would be very challenging to evacuate not only our residents but those up on the hill with only one road out. When we first moved here, we did have to evacuate due to flood warnings and there was no way to get in and out of LPR1 for three days. 28.3

3. **Inappropriate fit with our residential community**
LPR1was approved and developed as a rural residential neighborhood. This was a large reason that we bought our home here in the first place. We were assured that any development on the "hill" would be minimal and consistent with the Las Palmas Specific Plan and Monterey County Plan. The parcel is zoned "medium density residential" and was specifically approved for a total of 8 units. Assisted living facilities are not considered residential units. Las Palmas is essentially built out now, 1028 between LPR1 and LPR2 against a limit of 1031. 28.4

PLN150372

In addition, we went through a similar process in 2006/7 with the Corey House proposal. The vast majority of homeowners in Las Palmas did not support the changes at the Corey House which entailed making a parking lot in front of our home out of a park like setting (removing all the trees and grass area) as well a destroying some historical property inside the home. The Planning Department approved the proposal and ultimately, the owners declared bankruptcy and the Corey House remained vacant for several years.

There are numerous other issues regarding the above proposal which are not addressed in the draft EIR. There is little mention of the impact this development would have on our community. We urge you to deny this proposed development in view of the above concerns. Thank you.

Sincerely,

Anne and Rafael Sanchez
17540 Woodridge Ct.
Salinas, CA 93908

Letter 28

COMMENTER: Anne and Rafael Sanchez

DATE: March 25, 2018

Response 28.1

The commenters state that they are opposed to the project.

This commenter's opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Response 28.2

The commenter describes concerns about traffic and safety.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 28.3

The commenter describes concerns about emergency evacuation.

The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. Also refer to Topical Response B for a discussion of emergency response access and fire safety.

Response 28.4

The commenter states that the project is not an appropriate fit with the neighboring residential area. The commenter states that the residential limit for Las Palmas is already nearly met.

Please refer to Topical Response C for a discussion of land use compatibility, including a discussion of the residential limit for the LPRSP Plan Area. As noted therein, the residential limit is not applicable to the proposed project, which is not a residential project.

Letter 29

Jerry L. Crawford
21109 Country Park Rd.
Salinas, Ca 93908
831-455-8545
eastofeden222@yahoo.com

March 27, 2018

Mr. Joseph Sidor, Associate Planner
Mr. Brandon Swanson, Planning Manager
Mr. Carl Holm, Planning Director,
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Gentlemen:

I am resident of Las Palmas and strongly opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372). This community was chosen by the residents as a quiet, safe and relatively dark haven from the Salinas proper area. 29.1

I proposed visiting your office with a sizable mob wielding pitch-forks and flaming torches but was voted down by the board … just kidding.

However, this large proposed non-residential development is inconsistent with the Las Palmas community.

I. Traffic:

- **River Road Traffic:** The stop light at LP1 entrance has seen 20 accidents over the last few years. One 4-year old child has already died by a texting drunk-driver. I personally observed one accident. Additional traffic for the "Parcel Q" will aggravate this situation. Currently, the curve blocking the visual to the LP1 light, allows only 4-5 seconds (traveling at 55 mph) before reaching the intersection. This short distance is suspected as the cause of several inattentive drivers causing accidents at this point. If the proposal goes through, any celebrations with family members over holidays and family events at "Parcel Q" will increase the traffic load and potential for blood shed. 29.2
- **Security Stops:** Traffic already backs up into the River Road exit lane at peak times due to our security check point. Adding 50+ cars and construction vehicles a day will increase the potential for further traffic congestion and accidents.
- **Emergency Situations:** God forbid, the potential for a conflagration erupting on the south end of the canyon would necessitate immediate evacuation of all members of the community. A wind driven fire could spread exponentially in these closely packed houses as seen in recent fires in northern and southern California. There are 2 exits to get out for over 300+ homes!
- **Construction Traffic:** The traffic generated by the construction phase will be extremely problematic. This quiet valley is nestled between two large hill sides. Any construction

traffic noise would be echoed off the hills. Construction and delivery equipment would need to climb a steer entrance road at low gear. Any subsequent grading equipment will emit a loud back up beeping noise that will be heard from all LP1 units. This constant and increased traffic would irrevocably alter the safe, peaceful nature of the community.

- **Commercial Traffic:** The proposed non-residential development would bring increased emergency fire and ambulance calls. These will bring unwanted noise and light pollution at all hours of day and night. Any commercial vehicles -- food deliveries, medical waste, trash, linen, etc., -- and 50+ employee vehicles will funnel through a narrow street originally designed for residential traffic.

29.3

II. Security

- Security of the neighborhood would be compromised by this unwarranted, greedy assault on LP1 community. As this will open the neighborhood to non-residential traffic, we fear an increase in crime that has decreased since installation of LP1 security personnel. There is no way to regulate this increased traffic and guarantee the security of the neighborhood. This is a real concern.

29.4

III. The Proposed Non-Residential Development is Inconsistent with the Existing Residential Community

- Under The Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood.
- This parcel is zoned "medium density residential," at 2.61 units per acre. Under the Las Palmas Plan this parcel was specifically approved for 8 units total. The developer now seeks a "conditional use permit" to allow development of a non-residential facility with a total of 105 units. This is inconsistent with The Las Palmas and Monterey County Plans.

- The developer seeks to circumvent these plans by requesting an amendment for a non-residential use. Specifically, the developer asks you approve an amendment with the following language; ***Assisted living facilities are not considered residential units (and should not be) subject to the residential limitation of the (Las Palmas) Plan.*** An assisted living facility is not a residential use, because it does not operate or function in a manner like independent residential units.

- Las Palmas is a highly desirable residential community with stable property values. Residents fear the loss of their investment potential from a rush to get out of LP1 due to the nature of this development. Several friends have moved out fearing this project.

29.5

IV Intrinsic Values: Development of this size will alter our environment.

- The location in question has 80+ eucalyptus trees that will be removed under current plan. These provide wind and Hwy 68 sound abatement.

- Moreover, these eucalyptus trees are home to several generations of Red Tailed Hawks and Great Horned Owls. Last year we had an overabundance of Vols (large field mice) which were running around even in daylight. These essential predators were active in Vol reductions. Watching these great birds soar and perform aerial ballets over our hillsides is unmatched in Salinas proper.

- Bobcats and deer live up on the hillsides and area in question. Last year one female bobcat brought her 3 cubs out into our common area multiple times. This was a delight of all who caught this rare event. One mother deer has birthed 5-6 pairs of babies over the last few years and we have watched them grow into adulthood.

- Destabilization of the steep hillsides in question is a serious threat to mudslides. We have experienced similar events even without any development activity. 29.6

- There is a sense of fear in LP1 that is unparalleled in my 15 years in the community. 29.7

- Would you want this development to go forward next door to your home?

- Light Pollution: We currently are able to view changing of the planets and star constellations due to our unpolluted dark areas. This will stop under the PLN#1500372. 29.8

- Noise: A friend who worked to help develop a similar nursing home in Hollister indicated the potential of "Screamers" being heard in the night is real. She later regretted helping this proposal from just this perspective. 29.9

- Smells: As this proposed facility will generate substantial numbers of meals, we will not enjoy sharing their menus due to prevailing winds. 29.10

To approve this amendment to the Las Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community. 29.11

I request you please carefully consider these issues when considering this proposed development. This proposed non-residential development is inconsistent with the existing residential community and should not be approved.

Thank you for your consideration,

Sincerely,

Jerry L. Crawford

Letter 29

COMMENTER: Jerry L. Crawford

DATE: March 27, 2018

Response 29.1

The commenter states that they are opposed to the proposed project.

This commenter's opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Response 29.2

The commenter describes concerns about traffic, safety, noise, and emergency evacuation.

Please refer to Topical Responses A, B, D, and H. As described therein, impacts related to the issues mentioned in the comment would be less than significant or less than significant with mitigation incorporated, with the exception of a significant and unavoidable traffic impact to SR 68.

Response 29.3

The commenter states that the project would compromise security in the Subdivision.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision. Regarding the Subdivision's private security service, refer to Topical Response I, which discusses the project applicant's responsibility to share in the LPHOA's security costs.

Response 29.4

The commenter states that the project is inconsistent with the site's designated land use. The commenter states that the project would impact neighboring property values.

The project is a senior assisted living facility. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. For more detail, refer to Topical Response C.

Response 29.5

The commenter describes impacts to trees and wildlife.

Please refer to Topical Response G. As described therein, the project's impacts related to wildlife would be limited due to the size and placement of the project site. To reduce potential impacts to special status wildlife species, the Final SEIR includes mitigation measures, as listed in Section 4, *Amendments to the Draft SEIR.*

Response 29.6

The commenter expresses concern about mudslides/slope stability.

Please refer to Topical Response E. As described therein, a geotechnical report was prepared for the project, with recommendations to be included in the project plans. The project would not result in significant impacts related to geologic hazards.

Response 29.7

The commenter states that the neighboring community is concerned about the project.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 29.8

The commenter expresses concerns about light pollution.

Please refer to Topical Response F for a discussion of light pollution. As noted therein, mitigation is required to reduce lighting impacts to a less than significant level.

Response 29.9

The commenter expresses concerns about noise.

Please refer to Topical Response H for a discussion of the project's operational noise impacts. As described therein, the project's noise impacts would be less than significant.

Response 29.10

The commenter expresses concern about odors from meals.

Odor is discussed in the Draft SEIR in Section 6.0, *Air Quality,* of the Draft SEIR, and again in Topical Response C. Odors released outdoors from meal preparation would be intermittent and unlikely to be objectionable to the extent of causing a public nuisance.

Response 29.11

The commenter reiterates their concerns and opposition to the project.

The commenter's opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Letter 30

Concerning the River View at Las Palmas Assisted Living Senior Facility

(PLN 150372; SCH # 2017031025)

Hello, Joe

Please find enclosed my comments and concerns about the afore mentioned project currently before the Monterey County Resource Management Agency. I've added my thoughts in RED for clarity.

My name is Michael j. Kulow and reside at 21096 CountryPark Rd. in the Las Palmas I subdivision.

Cell, 760-996-2975, e-mail mike@mjkmgmt.com

Cc: Brandon Swanson
Cc: Carl Holm

Regards, Mike.....

RECEIVED
MAR 27 2018
MONTEREY COUNTY
PLANNING DEPARTMENT

My name is Michael Kulow and I have owned the property at 21096 CountryPark Rd. since 1989 as I am one of the original homeowners. When Las Palmas was first put on the market I saw it as an opportunity to own a piece of property in an ideal setting, close to my work and in a country sitting as well. My home backs onto the hill and was chosen because I would not have anyone living directly behind me and I could take advantage of the views of the mature Eucalyptus grove and grassy hillside behind me. Over the years i've lived here i've seen deer, bobcats, wild turkey and coyotes pass on the hill behind me on their way to the river for water. With hawks circling above and calling to thier young. "A perfect sitting!" Peaceful and pristine, all that will end if this proposed commercial development is given the ok to proceed with construction. Beside the almost assured loss of value of my property would be the greater loss of my beautiful home site. This proposal should be rejected for many reasons beyond my personal loss. First of all it doesn't belong in a residential neighborhood. It should be for safety reasons alone built closer to existing medical facilities and more easily accessible than down a "one lane" residential road that is frequently blocked due to homeowners coming and going trying to use this same one lane road. I am totally opposed to this facility being built in any configuration. Thank you for the opportunity to, I hope have a say in your decision. Regards,
MichaelKulow ..... I can be reached by e-mail at **mike@mjk-mgmt.com** or by phone on my cell @ (760) 996-2975.

30.1

The draft EIR results from the Notice of Preparation (NOP) issued by the Monterey County Resource Management Agency - Planning Department, dated March 7, 2017.

This is with reference to the proposed project "River View at Las Palmas Development Application" County Planning file # PLN150372.

CEQA QUESTIONS CONSIDERED. Additions & Comments in RED by Kulow Family, 21096 CountryPark Rd.

I. AESTHETICS -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

30.2

Yes – State Highway 68 from State Highway 1 in Monterey to the Salinas River is a State Scenic Hiway, and both River Road and Spreckels Boulevard are County Scenic Roads. All three roads are designated as Tourism Access Hiways.

I think this commercial enterprise would adversely impact the beauty of the River Rd. area and detract from the efforts of the local wine growers to advertise their tasting rooms along the "Central Coast Wine Road". They have invested large amounts of money and time in Signage and Advertising calling the attention of the visiting public to the beauty and tranquillity of the Santa Lucia Highlands, which is a major wine producing area and tourist attraction not a site for Commercial Developments. These structures will be a blight on the natural beauty of this scenic area especially since they would be built right on the northern entrance to the area, the first thing visitors will see when they start down the Wine Road.

With at least one large building of three floors (30ft roofline) it will be very difficult for the proposed high density of building to be hidden from view by any form of bush or new tree landscaping. In all three cases (Hiway 68, River Road and Spreckels Boulevard) the development would be clearly visible and clash with the pastoral view. These tall buildings do not fit in the present landscape of the area and would greatly increase the amount of night time light pollution in the area especially after cutting down 80 mature Eucalyptus tree which are the nesting site for several pairs of Owls and Red Tail Hawks that have lived in these trees for decades.

Further, the Nationally listed Historic Corey House is also preserved within Las Palmas 1 and will be close to (i.e. adjacent) and heavily overlooked by the proposed development which will totally affect its setting. Governing Authorities are on record of effectively protecting the Regionally important Tourist Industry and associated Historic buildings. Added to this is the grassy area directly across the street from the Corey House, which is one of the areas in Las Palmas I that has no sidewalks, this area was purchased by the home owners to be used as an area to exercise our dogs and entertain our children placing both children and dogs in danger due to the increase in vehicle traffic going to and from this facility, a danger that does not currently exist due to the fact this has been a dead end road.

30.3

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Yes, The EIR requests the removal of 80 Eucalyptus trees. This would scar the scenic beauty and have negative effects on soil stability, wind shielding and noise propagation (Mentioned elsewhere)

30.4

This would degrade the existing visual character and quality of the site and its surroundings? One need only look at figure 3-4 in the Site Photos page to see what would be lost if these tree are removed. This is pastoral beauty that is rare anymore, anywhere. Let alone the current nesting sites for several local raptors, Owls and Hawks that help control field mice who are prevalent naturally in the vicinity of this hill site area. Bobcats and Mountain lions along with Deer and wild turkeys have been seen in the area and use this byway as access to the water in the river below. All this will be put in jeopardy by this development.

Yes. The proposed site presently is pristine wilderness. See figure 3-4 Site Photos. It is the setting for an immediately adjacent residential neighborhood which was carefully sited in 1989 to blend with the pastoral beauty of the area. The bulk and scope of the proposed facilities would sharply clash with this setting.

This hill top area was, in the original site plan approved by the city or county as the case may be, as a site for the building of two or three private homes for the prior property owners families, a minor impact, which could have easily been sited among the existing Eucalyptus so as not to lose these mature and stately trees, not for a very large commercial development which wants to butcher the beauty of this site for the sole purpose of monetary gain by a group of east coast investors that don't even live in this beautiful area and it appears don't care about the loss of this pristine site.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Yes. Despite proposed lighting and visual mitigation measures by the developer, the removal of the Eucalyptus groves, coupled with the location of a three story facility on an exposed knoll would be clearly be visible both during the day and certainly at night.

30.5

As my home lies directly below the proposed site of several of the "Casitas" the light pollution and the ability of the residents to look directly down into my backyard and the rear windows of my home would have a strong adverse effect on my privacy and peace of mind and no doubt the future value of my property.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project: 30.6

a) Conflict with or obstruct implementation of the applicable air quality plan?

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Possibly. The particulate monitoring station is 6 miles southwest of the project site at Laurel and Constitution measuring an urban environment. We need accurate measurements locally to characterize conditions. This area is windy (trees are permanently bent as they grow) and excessive particulate matter from the adjacent fields such as pesticides, fertilizer and allergens are likely to adversely affect the intended facility's vulnerable senior population. The Fort Ord Recreational area directly to the north of this proposed building site is still being periodically cleared of ordinance by burning off the cover brush which raises the smoke level to such a high level that warnings are published and broadcast by the local media. This should definitely be a cause of great for concern for older residents with any breathing problems.

e) Create objectionable odors affecting a substantial number of people?

Yes. This is an institutional facility with a large number of people both residing there plus support staff, visitors, etc. Meals will be prepared and served on site. Institutional cooking odors would waft across the adjacent Las Palmas I neighborhood, especially the most adjacent homes. 30.7

VI. GEOLOGY AND SOILS -- Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: 30.8

ii) Strong seismic ground shaking?

Yes. The recent (November 2017) 4.2 grade local earthquake rocked the area and the raised location of the proposed development would put heavy buildings and roads right above the Phase 1 homes adding risk for serious seismic related failures.

iii) Seismic-related ground failure, including liquefaction?

Yes. Civil engineers have assessed Parcel Q land as unconsolidated silt, sand and gravel and warned the developer of the unstable nature of sections of the property. This type of soil, "unconsolidated", would be highly unstable and like building your house on sand instead of rock and the porous nature of this same type of soil will add to the landslide danger of this hillside.

iv) Landslides?

Yes. Las Palmas I has experienced landslides historically on its perimeter below the proposed site. As recently as February 2017, there was a severe landslide near Country Park Road in the 20100 to 21056 region. Several homes were nearly flooded and only emergency efforts by neighbors and Salinas Fire Department personnel averted serious home damage. This slide was only recently repaired by the developer. The slide location was not unique as slopes near the proposed building site are uniformly steep. We can expect more..... 30.9

It is to be noted that this slide occurred naturally. Imagine the consequences of construction on the site with heavy equipment, coupled with the eradication of 80 large Eucalyptus trees.....

The original developer, Mike Fletcher, chose to build on the lower terrain. Clearly this was to avoid the difficulties associated with the higher slopes on Parcel Q.

Example, near Canyon Park, just off the perimeter road, you can see two concrete retaining walls installed early on in Las Palmas I. These were erected to mitigate "toe-outs" during winter storms

As stated above my home currently is at the base of the hill below the site of the "Casitas" and in the past i have seen this hill side slip down toward the access road and my rear fence, this has already happened twice due to the instability of the soil make up of this hillside. And if it moves at the bottom it will eventually move the top of this hill with very adverse effects- The trees are the only thing in most areas of the hill holding it from sliding into our backyards. Cutting any of these tree would be dangerous to the stability of the whole hillside area. Cutting any of these trees could have a monumental impact on the homes and the people living in those homes at the base of the hill, remember "MONTECITO, Ca."

IX. HYDROLOGY AND WATER QUALITY -- Would the project:
a) Violate any water quality standards or waste discharge requirements?

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

30.10

Yes. See item (e) below.

e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Yes. The proposed facility will cover 190,000 square feet (4.36 acres) with pavement, roads and buildings. Where will all that storm water flow to?

The addition of roadways and concrete patios and to the highly porous soil areas on the top of this hill, see VI Geology & Soils a iii) would cause a great increase in runoff and further exacerbate an already delicate situation as far as the stability of these hillsides and their ability to hold water during the rainy season. The increased run off these changes would make will greatly endanger the residents below to mud slides. Currently these hillsides dry out over the summer thus increasing their ability to absorb rainwater during the rainy season. With the proposed addition of landscaping for this project these hills would remain wet year around decreasing their capacity for absorption of the traditional yearly winter and spring rains and raise the danger of mud slides and flooding of the areas below.

Yes. See item (d) above.

j) Inundation by seiche, tsunami, or mudflow?

X. LAND USE AND PLANNING - Would the project:

a) Physically divide an established community?

Yes. RVLP is a 24/7, 365 commercial business inside a residential community.

Las Palmas I has parks and a basketball court for children and families to enjoy a safe lifestyle.

30.11

Much of the community presently has no sidewalks on either or both sides of the residential streets. In particular the road granting ingress and egress to the proposed commercial site. People walk their dogs throughout the neighborhood. Cars drive slowly and children play safely in the streets. All this quality of life is at risk with this planned development.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Yes. This project constitutes a clear violation of the Las Palmas Specific Plan where housing units are capped at 1031. Presently almost built out at 1028 units.....

Further, the easement with Parcel Q is in the context of MDR, not commercial or institutional use. Using the easement along Winding Creek would thus overburden it.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan? 30.12

Notarized statement from Susan Hearst is available re her observation of a protected salamander

XII. NOISE -- Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Yes. Due to the elevation of the proposed site vehicles arriving and leaving 24/7 will increase substantially the ambient noise. The topography of the hills coupled with the canyon below will amplify this objectionable road noise. There are many shift workers among the LPI homeowners and their rest time would be adversely affected by this increase in noise. 30.13

This facility would, because of the needs of the proposed inhabitants of this type of commercial endeavor, certainly increase the need for greater access to "ambulances" and fire & rescue equipment going to and from the facility at all hours of the day and night to meet the emergency situations that are bound to happen frequently due to age and health needs of the inhabitants. This noise will disturb the peace and quiet off the neighborhoods and is totally unacceptable to all concerned and what we moved here to avoid in the first place.

Yes. The elimination of 80 Eucalyptus trees and brush will reduce natural barriers to road noise from both the development and adjacent River Road traffic. The loss of this habitat alone should have stopped this proposed development in the first place.

b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?

Yes. Additional development generated traffic will subject LPI residents adjacent to Country Park Road, Winding Creek and River Run to excessive noise.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Absolutely. Las Palmas I currently is a peaceful and tranquil neighborhood. Ambient noise introduced by this proposed development will permanently disrupt our quiet and peaceful residential neighborhood.

c) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? See ambulances and fire and rescue vehicles above.

d) Yes. If this project proceeds the easement will be used by heavy equipment over the span of its construction. We had a taste of this during the recent slope repairs and it was quite disruptive and damaging. It would be difficult to imagine it lasting months.....

XIV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 public services:

30.14

Unclear at this time.

We do not sufficiently understand the impacts on resources for Fire protection, Police protection, Parks.

XVI. TRANSPORTATION/TRAFFIC –

Would the project:

30.15

a) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Unknown, but hopefully addressed by expert report commissioned by Christine Kemp

b) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Yes. Additional traffic will queue as the entry into Las Palmas Road clogs up due to security kiosk monitoring access. This in turn will fill up the deceleration lane on River Road that was not designed for that traffic load. The consequence is higher probability of collision as people come around the bend at River Road in a Southerly direction.

Additionally, both intersections – River Road at Las Palmas Road and River Road at Riverview Court have experienced multiple traffic accidents:

River Road at Las Palmas Road - 20 collisions 1998- spring 2017 and several deaths. This is a dangerous, high speed and mostly blind intersection.

River Road at Riverview Court - 4 collisions 1998 – spring 2017

c) Result in inadequate emergency access?

Yes. In case of fire, flood or earthquake RVLP residents, workers, visitors and service personnel will have to evacuate down a narrow service road onto Winding Creek and somehow merge with existing 329 homeowners & families scrambling to leave at the Las Palmas Road intersection. This is a single lane entrance road frequently blocked by people mistaking this Las Palmas for the other Las Palmas further down River Rd. and the duties of our security personnel checking everyone entering our neighborhood during the day. All the roads accessing the proposed development are "ONE LANE IN AND ONE LANE OUT!" a nightmare for any and all persons and personnel during an any emergency.

30.16

This poses an unacceptable risk to both RVLP patients and LPI residents .

A similar situation just occurred in West Chester, Pennsylvania on November 17, 2017 with a facility of approximately the same size as contemplated for RVLP.

"At least 27 people were known to have been injured in a massive fire at the Barclay Friends Senior Living Community. Firefighters alone were un-

able to evacuate residents, many with mobility impairments". (http://6abc.-com/2659822/)

Recent extreme fire experiences as witnessed during the Sobranes and Tubbs catastrophes point to inadequate emergency measures in evacuation standards. The Sobranes fire showed it can happen here; the Tubbs fire shows how deadly it can be in a similar setting.

There is only one narrow and steep road leading into and out of RVLP. From our viewpoint, placing the facility on the hill is like building a ship in a bottle – how do you get them out in an emergency?

In the evenings winds are considerable due to the topography of the slopes and valley. Such winds can quickly propel a minor fire into a blaze.

Fire danger is ever present due to the extremely dry conditions posed by local climate between April and November. The slopes are dry and brown during these months and it would not take much to start a grass or brush fire. A simple outdoor BBQ accident by a resident of the proposed casitas could easily trigger a disaster. Construction on the site and slopes could lead to sparks and a similar event. This fire hazard greatly concerns me because of the location of my home directly below these "Casitas" with nothing but dry grass between my home and the Castias.

XVII. UTILITIES AND SERVICE SYSTEMS -- Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? 30.17

Not sure. Present waste water treatment facility near the Kinship Center, operated by Cal Am Water has experienced capacity and quality issues. This needs further elaboration

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Possibly. Need more information

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Possibly. Need more information

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Yes. Water resources in Salinas are in overdraft situation. California is still in a drought. RVLP will exacerbate this already critical problem. Remember agriculture needs will always supersede residential requirements. We are and have always been short of water for crops here in the Salinas valley. And these crops are the life blood of this area. 30.18

What is the capacity of the existing wells and service area and what happens if the drought continues? The new well at the base of this hill did not exist before and during the last drought and could only pump 200 gallons a minute before the heavy rains of that year which relieved that drought. What will happen during the next inevitable drought.

How can the "Can and will serve letter" be issued under these conditions?

e) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Unknown 30.19

f) Comply with federal, state, and local statutes and regulations related to solid waste?

Unknown

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE --

e) 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)? 30.20

Yes. Traffic is already a dominant issue on River Road and Hiway 68 in consequence of past decisions to approve developments along these corridors. Incremental traffic burden generated by the projected development can only exacerbate this situation. The lack of unimpeded access for emergency vehicles alone should be of the greatest importance to any consideration of this project. This is unsafe and dangerous situation for all concerned.

b) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Yes. People bought their homes here based in part on the low traffic in the neighborhood. They will be subjected to much greater traffic noise and danger than they expected and consequently suffer adverse effects. I am one of the original property owners and this was a major consideration when i bought my home and is still one of the greatest reasons i still live here. I don't want this peaceful atmosphere disturbed, especially by a commercial development that doesn't belong here and could be placed in a better area of the city more conveniently located to other medical care facilities.

Non - CEQA QUESTIONS CONSIDERED.

The following headings contain critically important PROJECT related concerns, none of which are addressed in the EIR.

INTRODUCTION:

30.21

Some context for these concerns follows before specific issues are addressed.

In the late eighties Las Palmas I was developed, marketed and sold based on the concept of "affordable" housing. Sales brochures from the period describe a pristine country setting, attractive housing and a relaxed neighborhood atmosphere where young families could safely raise their children and older homeowners could enjoy the natural surroundings. These were the premises underlying approval for the project by the Board of Supervisors at the time. These were the reasons people bought their homes. These are the reasons we still live here and love our neighborhood. These are the reasons we strongly object to this proposal.

1) Security & Safety
   By the early 2000's it became evident that there were issues with safety and theft. Daytime break-ins became more frequent and in 2008 the Homeowner Association invested in an access security system that included a staffed guard house at the Las Palmas Road entrance and an electronic gate at Riverview Court. Additionally there are security patrols in the evenings. Consequently our crime rate dropped substantially – certainly contrasted with Toro Park and other areas in Salinas. Neighborhood watch meetings are held and a Monterey County Sheriff recently remarked how favorably Las Palmas I security compares with other areas patrolled by the County Officers.

The projected senior care facility development threatens this achievement. A facility with 144 beds requires 92 employees, access for deliveries and services, visitors, etc. etc. This additional influx of people would enter at the Las Palmas Road intersection and quite overwhelm the guard services there and thus pose security risk let alone the need for 24/7 EMT and Fire and Rescue Personnel with the noise of sirens and lights entering and leaving on the one lane roads day and night to service the people housed in the proposed facility. Moreover, this extra traffic burden would pose a serious hazard to both present homeowners and RVLP connected people in that the area is quite constricted. This is the safety risk we object to.

2) Economic Impact

As explained above in the INTRODUCTION, the prime driver for people to buy into Las Palmas I is the quality of the surroundings, coupled with attractive and affordable homes in reasonable proximity to Monterey and Salinas. A place to safely raise children, for people to walk around their neighborhood, and enjoy the peace and tranquility of the natural setting.

All this represents VALUE and thus a purchase into this neighborhood is a huge investment for many of us, and the biggest asset for most of us.

The proposed senior care facility will depress the value of our homes. Traffic, Noise, Less Security, More Risk, Less Harmonious Surroundings.....Less places for our families to play and grow will alter our quality of life forever and surely lower the current status and local standing as one of the most sought after and premier areas to live in the Salinas valley.

We ask: why should the non resident east coast developer be able to maximize his investment at our expense?

3) Neighborhood Fit

This proposed RVLP development is demonstrably a poor fit with the existing Las Palmas I community. This is a residential community not an area for commercial development.

1) Considered from the Las Palmas I perspective this proposed project is contrary to the very reason people bought their homes here. It will no longer be a safe, family friendly community.

   - A neighborhood sponsored survey in early 2016, given the choice between support for and opposition to the project as proposed, demonstrated 93% opposition to the project. (50% of 329 polled)

   - In 2017 a similar effort our HOA to gage neighborhood opinion resulted in 212 votes out of 329 homes:
     - Support : 9 Oppose : 153 Neutral : 50

   - Methodology differed between the two outreach approaches, but the conclusion in both was overwhelming opposition to the proposed development.

2) Considered from a plain common sense perspective, one wonders why a senior care facility would be located miles away from essential medical infrastructure such as hospitals and clinics, why isolate vulnerable older people on top of a hill with severely restricted ingress and egress, and lastly – why ignore the clear wishes of a majority of residents in the neighborhood by forcing an institutional business immediately adjacent to an established neighborhood?

<u>RVLP does not fit into our neighborhood!!!</u>

Letter 30

COMMENTER: Michael J. Kulow

DATE: March 27, 2018

Response 30.1

The commenter states that they are opposed to the project. The commenter introduces the concerns that are further detailed throughout the comment letter.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

The commenter's concerns are addressed individually below.

Response 30.2

The commenter states that the project would have aesthetic impacts related to views from scenic highways, disruption of the surrounding landscape, and light pollution. The commenter states that tree removal would impact nesting owls and Red-tailed hawks.

Regarding neighborhood fit, please refer to Topical Response C. As described therein, the project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use.

For a discussion of aesthetic impacts, refer to Topical Response F. As described therein, the project's aesthetic impacts would be less than significant or less than significant with mitigation incorporated.

Impacts to nesting birds are addressed on page 7-22 and page 7-25 in Section 7.0, *Biological Resources,* of the Draft SEIR. Mitigation Measure BIO-4 requires a survey prior to tree removal and monitoring, exclusion, and habitat replacement measures if bats or roosting sites are found. This mitigation would reduce impacts to owls and red-tailed hawks to a less than significant level. For additional discussion about impacts to common wildlife species, refer to Topical Response G.

Response 30.3

The commenter notes that Corey House, which is listed as an historic resource, and Corey Park are nearby the project site. The commenter states that the project would affect the setting of Corey House, and that project-generated traffic would endanger children and dogs in the vicinity of Corey Park.

As noted in Section 11.0, *Effects Not Found to be Significant*, of the Draft SEIR, under Cultural Resources, Corey House is in the vicinity of the project site. However, Corey House is not on or adjacent to the project site. There is existing residential development between the project site and Corey House. Development of the project site would not impact Corey House or its immediate surroundings.

Regarding traffic along Corey Park, please refer to Topical Response D. As noted therein, the proposed project would not substantially increase safety hazards for pedestrians and bicyclists, including people accessing Corey Park.

Response 30.4

The commenter states that tree removal would cause aesthetic impacts and impacts to wildlife.

Regarding aesthetic impacts, please refer to Response 30.2 above and Topical Response F. As stated therein, impacts to scenic resources and private views would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Regarding impacts to wildlife, please refer to Topical Response G. As stated therein, impacts to wildlife would be mitigated to less than significant by preconstruction surveys and avoidance.

Response 30.5

The commenter states that the project would be visible during the day and night, and that the project's lighting and vantage would invade the privacy of Subdivision homes.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

Response 30.6

The commenter states that the residents of the senior assisted living facility would be vulnerable to air pollution from nearby agriculture and from controlled brush fires in the Fort Ord area.

The comment refers to air quality impacts from sources other than the project. Dust from agricultural operations is an existing condition. The proposed project would not exacerbate this condition; as such, dust from agricultural operations is not considered an impact of the proposed project. The potential air quality impacts of the project are discussed in Section 6.0, *Air Quality*, of the Draft SEIR. As shown in Table 6-3 and Table 6-4of the Draft SEIR, the North Central Coast Air Basin is in non-attainment with State mandated thresholds for ozone and suspended particulate matter, but there were no recorded exceedances of state or federal standards for ozone or particulate matter from 2013 to 2015 at the MBARD monitoring station located at East Laurel Drive and Constitution Boulevard in Salinas, approximately six miles northeast of the project site, which is the nearest MBARD monitoring station to the project site. The comment is herewith shared with the County's decision makers for their consideration.

Response 30.7

The commenter states that the project would cause objectionable odors from meals.

Odor is discussed in the Draft SEIR in Section 6.0, *Air Quality,* of the Draft SEIR, and again in Topical Response C. Odors released outdoors from meal preparation would be intermittent and unlikely to be objectionable to the extent of causing a public nuisance.

Response 30.8

The commenter states that the project would expose people or structures to impacts from seismic ground shaking and seismic-related ground failure.

Please refer to Topical Response E regarding slope stability. As described therein, geotechnical report was prepared for the project, with recommendations to be included in the project plans. The project would not result in significant impacts related to geologic hazards.

Response 30.9

The commenter states that the project would increase existing landslide risks.

Please refer to Topical Response E regarding landslides. As described therein, a geotechnical report was prepared for the project, with recommendations to be included in the project plans. The project would not result in significant impacts related to geologic hazards.

Response 30.10

The commenter states that the project would have impacts on stormwater drainage.

Please refer to Topical Response E regarding stormwater drainage. As noted therein, the project would not result in significant impacts related to flooding. Stormwater drainage of the project site would prevent flooding of the site's entrance.

Response 30.11

The commenter states that the project would physically divide an established community and conflict with land use plans.

The project would not physically divide an established community, as it is on the outside of one, not in the middle. Please refer to Topical Response C for discussion of consistency with land use plans. As noted therein, the project would be consistent with LPRSP policies.

Response 30.12

The commenter notes a reported observation of a tiger salamander in the area.

The incidental observation of a CTS by a private citizen is undocumented and cannot be verified; however, a desktop level review is provided in Response 5.2 to support the assessment of CTS habitat at the project site. For additional detail refer to Response 5.2 and Topical Response G. As discussed therein, the small size of the project footprint, and the placement of the project site among residential and agricultural development decreases the value of habitat for special status wildlife. Impacts to common wildlife species would not be considered significant under CEQA, and potential impacts to special status wildlife is mitigated through implementation of the Draft SEIR mitigation measures requiring preconstruction surveys and avoidance, and through the implication of the additional mitigation measures proposed in Response 5.2.

Response 30.13

The commenter describes concerns regarding noise impacts.

Please refer to Topical Response H. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 30.14

The commenter states that that it is unclear whether or not the project would impact public services.

Please refer to Topical Response A and Topical Response B. As noted therein, Section 11.9, *Public Services*, has been revised to clarify that the project would have a less than significant impact on fire and police protection services, and no impact on schools and other public services. Implementation

of the project would not require new or expanded public facilities to continue providing the existing level of public services experienced by residents in the vicinity of the project site.

Response 30.15

The commenter states that Christine Kemp has addressed traffic concerns. The commenter states that the project would increase traffic hazards due to a design feature, due to queuing at the Subdivision entrance.

For the letter by Christine Kemp, please refer to Letter 8. For further discussion of traffic impacts related to the Subdivision entrance, refer to Topical Response D. As noted therein, a separate entry is not available for the project applicant, nor is a separate entry necessary to avoid traffic impacts.

Response 30.16

The commenter states that there would be an impact on emergency access and fire response.

Please refer to Topical Response D. As noted therein, mitigation is required to reduce impacts related to emergency evacuation to a less than significant level. The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project.

As noted in Topical Response B, Section 11.9, *Public Services*, of the Draft SEIR has been revised to note that the Monterey County Regional Fire District (MCRFD) reviewed the proposed building and site plans, and has determined the project would not require new or expanded public facilities to continue providing the existing level of public services experienced by residents in the vicinity of the project site.

Response 30.17

The commenter requests information regarding the project's water and wastewater impacts relating to utilities and service systems.

Water supply is discussed in Section 10.0, *Water Supply,* of the Draft SEIR. Wastewater is discussed in Section 11.0, *Effects Not Found to be Significant,* of the Draft SEIR.

Response 30.18

The commenter describes water supply concerns and requests justification of the project's "can and will" letter.

Please refer to Responses 3.2 and 3.3, which address water supply comments from MCWRA.

Response 30.19

The commenter states that it is unknown whether or not the project would be served by a landfill with sufficient capacity or whether or not the project would comply with solid waste regulations.

As described in Section 11.0, *Effects Not Found to be Significant*, under *Solid Waste,* of the Draft SEIR the project's solid waste would be delivered to the Johnson Canyon Landfill or to other facilities that may be developed over time. The project would be required to comply with solid waste programs implemented by the Salinas Valley Solid Waste Authority.

Response 30.20

The commenter discusses traffic impacts.

Please refer to Topical Response D for a discussion of traffic impacts. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

Response 30.21

The commenter introduces a passage on "non-CEQA questions considered." The commenter discusses crime, economic impacts, and neighborhood fit.

Please refer to Topical Response A, Topical Response C, and Topical Response H. As noted in Topical Response A, the project would not result in a significant impact on police protection within the Subdivision. As described in Topical Response C, neighborhood fit is not an environmental impact and is not directly analyzed in the Draft SEIR. As noted in Topical Response H, sirens from emergency vehicles would result in a short-term spike in ambient noise levels at nearby residences. However, there is an agreement in place that the Subdivision is a "no-siren zone." Additionally, the County Code exempts "emergency vehicles being operated by authorized personnel" from noise regulation. Therefore, emergency vehicles would have a less than significant impact on ambient noise.

Letter 31

Received by RMA-Planning
on March 29, 2018.

Sidor, Joe (Joseph) x5262

From: JULIE <rjlsutliff@comcast.net>
Sent: Wednesday, March 28, 2018 9:01 PM
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; hommcp@co.monterey.ca.us; Roygobets@aol.com
Subject: RVLP Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)
Attachments: b6ce27ddb8cc38face1112e3d2e39213.jpeg.smartcrop279x152.jpg; 4b3568da315a4f5fb19c9d6adb3ab34d.jpeg.smartcrop279x152.jpg; b90167289aa1fde030ce292f4aa29155.jpeg.smartcrop279x152.jpg

Hello Mr Sidor,

We are writing you because we are very concerned about the proposed commercial project for several reasons.
First reason is that our home is here, our largest investment, in both memories and financially, that we have enjoyed for the past 13 years.
The idea that the County might approve the application for a large commercial business to be built in a private neighborhood is disturbing. 31.1

We are passionate about where we live. We invested in this neighborhood of 329 homes, mostly families with children,
because of it's privacy and park like setting. The "Las Palmas Specific Plan" currently allows three additional residences to be built on Parcel Q
and it should remain residential only. The proposed development by Mr Shingu is a business, not a residence. Businesses make profits, homes do not.
We are not against senior housing, but we are against a commercial business being built within our neighborhood boundary.
Mr Shingu purchased the property without regard to the residents of Las Palmas 1 and we are asking you to please Not Approve Mr Shingu's application!

Do you know that Mr Shingu has this property for sale on the internet? He purchased Parcel Q knowing he
had to hire top attorneys and change the "Las Palmas Specfic Plan". We, along with many other residents, have had to dedicate our
personal time to research the effects of his proposal and an on-going effort to educate neighbors about the application and it's process. If approved, by you,
we will lose, at his profit, everything we have worked so hard for. Las Palmas 1 will forever be changed if his commercial business application is approved by you.
Please do not approve it!

A huge concern will be the additional traffic that will be going in and out of Las Palmas Road from River Road. We already have, on the average, 100
cars per month making U turns at the intersection because drivers are lost. The private entrance to Las Palmas 1 will become a major traffic
crossing. The curve on River Road (blind spot) has already proved to be fatal with the death of one child. Several accidents have also taken place at this intersection.
Please do not put the residents and/or visitors of Las Palmas 1 at an even greater risk of more and more car accidents and possibily another fatality.
Please do not approve Mr Shingu's application! 31.2

Have you visited Las Palmas 1 and walked our parks and strolled our streets? Las Palmas 1 is a quiet neighborhood with parks, residents enjoying
the comfort of walking the street, children playing catch, basketball and riding their bikes in the street, folks walking their dogs and simply enjoying the outdoor life style.
Our parks and the Eucalyptus trees are habitats for many animals, including Monarch butterflies, hawks, owls and quail. Please don't take that away from us!
Letting Mr Shingu destroy our park and quite streets for his commercial business opportunity doesn't make sense in a world where having a safe
place to roam around in the parks and streets, with friends/family/pets, is rare in most areas.
Please do not allow this to happen to 329 residences of Monterey County that chose to make Las Palmas 1 life style their home!

31.3

There are so many other areas where Mr Shingu could have purchased property that is not already in an established residential neighborhood and
zoned only for residential use. He saw an opportunity and chose to use the system to get what he wants no matter the cost, financial and emotional, to the 329 home owners that
bought here for the privacy Las Palmas 1 is well known for. Mr Tony Lombardo is Mr Shingu's attorney and to share an interesting point, we have included a paragraph
for you to read from The Carmel Pine Cone dated 11-5-15, titled "Dog Park rejected..." where Mr Lombardo represented Quail Lodge; "According to Lombardo, the canine center
would generate significant amounts of unmitigated traffic" and "increase water use" ..." We find it interesting that Mr Lombardo takes the opposite side of the spectrum when
hired by a developer seeking profit, to do the same thing the dog park representatives wanted in Carmel Valley. In addition, Mr Shingu, with Mr Lombardo present, has been asked
by homeowners to stop this process and find an alternative site and/or access to his retirement facility.
If approved, Las Palmas 1 will decline in value, and it's unique family atmosphere will fade away.

31.4

Another major concern is the construction of such a project on a hill that has already proved to be unstable. Attached are three photos of the recent
landslide (November 2017). This is the second such landslide, and that's without all the construction, bulldozers and cement trucks moving dirt around
on top of the hill. The recent Montecito fire/mudslides, near Santa Barbara, are something very real that could happen on that hillside if the conditions are right. Probably most of
the letters you get will be from those folks that line the bottom of that particular hillside. Let's not risk it!

31.5

There are many factors as to why Mr Shingu's application should be denied. They include, 2 plus years of noise pollution with construction trucks driving up and down
the hill, which is estimated to be a 50% grade, light pollution, decline of water resources, fire hazards, evacuation concerns and only one road in and out. There will be
an increase of traffic throughout Las Palmas 1 because Las Palmas Road will back up and drivers will reroute, to enter and exit, through our private gate entrance at Riverview Court.
The ridge line is another area of concern. In the beginning, you could see the bright orange tape from River Road. The tape has since faded and newer homeowners are not
given the full opportunity to judge the ridge line because the tape needs to be replaced for proper evaluation. The lights shining down from the buildings above Las Palmas 1 homes
will be a major problem for homeowners that line the bottom of the hillside. There are many other reasons to not approve Mr. Shingu's application, but the main reason is

31.6

that it is simply not the right fit for Las Palmas 1 and the "Las Palmas Specific Plan". Please do not approve Mr Shingu's application.

We hope you take all of our concerns seriously and would appreciate your response to each of them.

Respectfully,

Ralph and Julie Sutliff
17708 Riverbend Rd

Letter 31

COMMENTER: Ralph and Julie Sutliff

DATE: March 28, 2018

Response 31.1

The commenter states that they are opposed to the project and that it is a commercial business in a residential area. The commenter discusses the business transactions involved with the project.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

The project is a senior assisted living facility, which is consistent with the description of a "supportive housing" use. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. For more detail, refer to Topical Response C.

Response 31.2

The commenter states that the project would increase traffic and cause safety risks.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 31.3

The commenter states that the project is incompatible with the residential area.

For a discussion of operational noise impacts refer to Topical Response H. As described therein, traffic and noise impacts would be less than significant or less than significant with mitigation incorporated.

Regarding impacts to wildlife, please refer to Topical Response G. As described therein, the project's impacts related to wildlife would be limited due to the size and placement of the project site. To reduce potential impacts to special status wildlife species, the Final SEIR includes mitigation measures, as listed in Section 4, *Amendments to the Draft SEIR*.

Response 31.4

The commenter states that the project does not consider the financial and emotional cost to the neighboring homeowners. The commenter states that property values would decline if the project is approved.

Please refer to Topical Response C. As described therein, property value is not an environmental impact and therefore is not analyzed in the Draft SEIR.

Response 31.5

The commenter states that the project would be constructed on an unstable slope.

Please refer to Topical Response E regarding slope stability. As described therein, geotechnical report was prepared for the project, with recommendations to be included in the project plans. The project would not result in significant impacts related to geologic hazards.

Response 31.6

The commenter lists concerns related to noise pollution, slope stability, light pollution, water resources, fire hazards, emergency evacuation, and traffic.

For a discussion of noise pollution, refer to Topical Response H. As described therein, traffic and noise impacts would be less than significant or less than significant with mitigation incorporated.

Please refer to Topical Response E regarding slope stability. As described therein, geotechnical report was prepared for the project, with recommendations to be included in the project plans. The project would not result in significant impacts related to geologic hazards.

Please refer to Topical Response F, which discusses light pollution. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

The availability of water resources is addressed in Section 11.0, *Effects Not Found to be Significant* of the Draft SEIR.

For a discussion of wildfire impacts, please refer to Topical Response B, which includes analysis added to the Final SEIR addressing wildfire hazards. Impacts related to wildfire and fire protection would be less than significant.

Please refer to Topical Response D for a discussion of impacts on emergency evacuation. The project would not result in a significant impact on emergency preparedness within the Subdivision.

Topical Response D for a discussion of traffic impacts. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

PLN150372

Letter 32

RECEIVED
APR 02 2018
Monterey County RMA

March 28, 2018

Mr. Carl Holm, Planning Director,
Mr. Joseph Sidor, Associate Planner,
Mr. Brandon Swanson, Planning Manager,
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

To whom it may concern:

I am resident of Las Palmas and strongly opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372).

This community was chosen by the residents as a quiet and safe haven from the Salinas proper area. Personally, due to various health issues, the Las Palmas community deemed the right fit for my health quest with one of those reasons being the quiet and "non-stressful" environment. 32.1

Now with the proposed large non-residential development, it has been determined to be inconsistent with the Las Palmas community core values, as outlined below.

I. Traffic:

- River Road Traffic: The stop light at LP1 entrance has seen 20 accidents over the last 10 years. One 4-year old child has already died by a texting drunk-driver. Additional traffic for the "Parcel Q" will aggravate this situation. 32.2
- Potential Accidents: Currently, the curve blocking the visual to the LP1 light going south, allows only 4-5 seconds (traveling at 55 mph) before reaching the intersection. This short distance is suspected as the cause of several accidents at this point. If the proposal goes through, any celebrations with family members over holidays and family events at "Parcel Q" will significantly increase the traffic load and potential for blood shed.
- Security Stops: Traffic already backs up into the River Road exit lane at peak times due to our security check point. Adding 50-90 cars and construction vehicles a day will increase the potential for further traffic congestion and accidents. 32.3
- Emergency Situations: God forbid, the potential for a conflagration erupting on the south end of the canyon would necessitate immediate evacuation of all members of the community. A NW wind driven fire could spread exponentially in these closely packed houses as seen in recent fires in northern and southern California. There are 2 exits to get out for over 300+ homes plus the emergency vehicles, potential staff and patients! 32.4
- Construction Traffic: The traffic generated by the construction phase will be extremely problematic. This quiet valley is nestled between two large hill sides. Any construction traffic noise would be echoed off the hills. Construction and delivery equipment would need to climb a steer entrance road at low gear. Any subsequent grading equipment will emit a loud back up beeping noise that will be heard from all LP1 units. This constant and increased traffic would irrevocably alter the safe, peaceful nature of the community. 32.5

• Commercial Traffic: The proposed development would bring increased emergency fire and ambulance calls as both are required to attend. These will bring unwanted noise and light pollution at all hours of day and night. Any commercial vehicles -- food deliveries, medical waste, trash, linen, etc., -- and potentially 90+ employee vehicles will funnel through a narrow street originally designed for residential traffic.

II. Security

• Security of the neighborhood would be compromised by this unwarranted, greedy assault on LP1 community. As this will open the neighborhood to non-residential traffic, we fear an increase in crime that has decreased since installation of LP1 security personnel. There is no way to regulate this increased traffic and guarantee the security of the neighborhood. This is a real concern.

32.6

III. The Proposed Non-Residential Development is Inconsistent with the Existing Residential Community

• Under The Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood.
• This parcel is zoned "medium density residential," at 2.61 units per acre. The Las Palmas Plan indicates this parcel was specifically approved for 8 units total. The developer now seeks a "conditional use permit" to allow development of a non-residential facility with a total of 105 units. This is inconsistent with The Las Palmas and Monterey County Plans, and should be opposed.

• The developer seeks to circumvent these plans by requesting an amendment for a non-residential use. Specifically, the developer asks you approve an amendment with the following language; "Assisted living facilities are not considered residential units (and should not be) subject to the residential limitation of the (Las Palmas) Plan." An assisted living facility is not a residential use, because it does not operate or function in a manner like independent residential units.

• Las Palmas is a highly desirable residential community with stable property values. Residents fear the loss of their investment potential from a rush to get out of LP1 due to the nature of this development. Several friends have moved out fearing this project.

• To approve this amendment to the Las Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community.

32.7

IV Intrinsic Values: Development of this size will alter our environment.

• The location in question has 80+ eucalyptus trees that will be removed under current plan. These provide reduction in wind, ridgeline exposure and Hwy 68/RR sound abatement.

• Moreover, these 70+ year old eucalyptus trees are home to several generations of Red Tailed Hawks and Great Horned Owls. Last year we had an overabundance of Vols (large field mice) which were

32.8

running around even in daylight. These essential predators were active in Vol reductions. Watching these great birds soar and perform aerial ballets over our hillsides is unmatched in Salinas proper.

• Bobcats and deer live up on the hillsides and flats of the area in question. Last year one female bobcat brought her 3 cubs out into our common area multiple times. This was a delight of all who caught this rare event. One mother deer has birthed 5-6 pairs of babies over the last few years and we have watched them grow into adulthood.

• Destabilization of the steep hillsides in question is a serious threat to mudslides. We have experienced similar abundant rain-slide events even without any development activity. 32.9

• There is a sense of fear in LP1 that is unparalleled in my 15 years in the community. 32.10

• Would you want this development to go forward next door to your home?

• Light Pollution: We currently are able to view changing of the planets and star constellations due to our unpolluted dark areas. This will stop under the PLN#1500372. 32.11

• Noise: A friend who worked to help develop a similar nursing home in Hollister indicated the potential of "Screamers" being heard in the night is real. She later regretted helping this proposal from just this perspective. 32.12

• Smells: As this proposed facility will generate substantial numbers of meals, we will not enjoy sharing their menus due to prevailing winds. 32.13

I request you support the Las Palmas Community as originally intended for its residents and turn down the proposed development of Riverview at Las Palmas (PLN#150372).

Thank you for your consideration.

Sincerely,

3/28/2018

Lisa Tegtmeier,
Las Palmas 1 resident

Letter 32

COMMENTER: Lisa Tegtmeier

DATE: March 28, 2018

Response 32.1

The commenter describes the reasons for their choice to reside in the Las Palmas area, and suggests that the project is inconsistent with these values.

As described in Topical Response C, neighborhood fit is not an environmental impact and is not directly analyzed in the Draft SEIR.

Response 32.2

The commenter states that the additional traffic is a safety concern.

Please refer to Topical Response D. As stated therein, the project would not result in a significant impact related to traffic safety.

Response 32.3

The commenter notes that queuing at the private security gate during peak times may result in additional congestion and accidents.

Please refer to Topical Response D. As noted therein, vehicle trips generated by the project would increase the existing volume of inbound traffic at the gate by an estimated 16 percent (Higgins 2017, 2019). Las Palmas Road has enough capacity to accommodate these additional trips without resulting in substantial queuing in front of the gate, or in blockage of vehicles turning into or out from Winding Creek Road. As a condition of approval of the project, the County would require employees at the senior living community to display windshield tags. This condition of approval would eliminate the need to check each employee's vehicle, reducing the length of queues at the gate. Because queues would not be significantly increased as a result of the project, they would not cause additional congestion and accidents.

Response 32.4

The commenter states that the project would cause problems related to emergency evacuations.

Please refer to Topical Response B for a discussion of wildfire-related risks. Emergency access is also addressed under *Emergency Access* in Topical Response D. Impacts related to wildfire and fire protection would be less than significant. The project would not result in a significant impact on emergency preparedness within the Subdivision. Mitigation is required to reduce impacts related to emergency evacuation to a less than significant level.

Response 32.5

The commenter states that the project would add construction traffic and commercial traffic, which would result in noise impacts and light pollution impacts.

Traffic-related noise during both construction and operation are addressed in Topical Response H. As noted therein, construction and operation of the project would have a less than significant noise

impact. Light pollution is addressed in Topical Response F. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

Response 32.6

The commenter states that the project would compromise security in the Subdivision.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision. Regarding the Subdivision's private security service, refer to Topical Response I, which discusses the project applicant's responsibility to share in the LPHOA's security costs.

Response 32.7

The commenter states that the project is inconsistent with underlying plans and policies, and with the rural residential nature of the existing community. The commenter additionally states that the project would negatively influence property values within the Subdivision.

The project is a senior assisted living facility. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. For more detail, refer to Topical Response C. As described therein, property value is not an environmental impact and therefore is not analyzed in the Draft SEIR.

Response 32.8

The commenter states that the eucalyptus trees that the project would remove are currently providing benefits to the community and to wildlife. The commenter states that the eucalyptus trees are over 70 years old.

Tree removal and impacts to wildlife are discussed in Topical Response G and Section 7.0, *Biological Resources,* of the Draft SEIR. As noted in Topical Response G, impacts to common wildlife species would not be considered significant under CEQA.

Response 32.9

The commenter states that the project could destabilize the hillside.

Please refer to Topical Response E. As noted therein, 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, including slope stability and landslides.

Response 32.10

The commenter states that residents are fearful about the project.

The comment is noted but does not pertain to the adequacy of the Draft SEIR or CEQA process. Therefore, no further response is required.

Response 32.11

The commenter states that the project would cause light pollution.

Impacts related to light and glare are addressed in Section 5.0, *Aesthetics*, of the Draft SEIR. Implementation of Mitigation Measure AES-4 would reduce the impact of lighting by requiring lighting design and controls for the proposed project, which would reduce impacts to a less than significant level.

Response 32.12

The commenter states that the project would cause noise from "screamers" at the potential development.

The commenter does not provide specific evidence that people at the proposed senior living community would engage in screaming behavior that could substantially increase ambient noise levels at residences in the Subdivision. As noted on page 11-7 of the Draft SEIR, most activity at the senior living community would be confined inside of buildings. Indoor conversations and activities would not typically generate audible noise at nearby residences. Furthermore, as noted in the Draft SEIR, "Any outdoor activities are expected to be low intensity passive uses that would not generate excessive noise." For additional discussion of operational noise, refer to Topical Response H, which addresses operational noise impacts of the proposed project.

Response 32.13

The commenter states that the project would cause odors from meals.

Odor is discussed in Section 6.0, *Air Quality,* of the Draft SEIR, and again in Topical Response C. Odors released outdoors from meal preparation would be intermittent and unlikely to be objectionable to the extent of causing a public nuisance.

PLN150372

Letter 33

RECEIVED
APR 02 2018
Monterey County RMA

March 29, 2018

Mr. Carl Holm, Planning Director,
Mr. Joseph Sidor, Associate Planner,
Mr. Brandon Swanson, Planning Manager,
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

To whom it may concern:

I am resident of Las Palmas and strongly opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372). 33.1

This community was chosen by the residents as a quiet and safe haven from the Salinas proper area. Personally, I chose the Las Palmas community as a quiet and safe harbor for my wife and family. Now with the proposed large non-residential development, it appears the quiet and safe harbor is in danger.

This proposed non-residential development is inconsistent with the Las Palmas community core values, as outlined below.

I. Traffic:

• River Road Traffic: The stop light at LP1 entrance has seen 20 accidents over the last 10 years. One 4-year old child has already died by a texting drunk-driver. Additional traffic for the "Parcel Q" will aggravate this situation.
• Potential Accidents: Currently, the curve blocking the visual to the LP1 light going south, allows only 4-5 seconds (traveling at 55 mph) before reaching the intersection. This short distance is suspected as the cause of several accidents at this point. If the proposal goes through, any celebrations with family members over holidays and family events at "Parcel Q" will significantly increase the traffic load and potential for blood shed.
• Security Stops: Traffic already backs up into the River Road exit lane at peak times due to our security check point. Adding 50-90 cars and construction vehicles a day will increase the potential for further traffic congestion and accidents.
• Emergency Situations: God forbid, the potential for a conflagration erupting on the south end of the canyon would necessitate immediate evacuation of all members of the community. A NW wind driven fire could spread exponentially in these closely packed houses as seen in recent fires in northern and southern California. There are 2 exits to get out for over 300+ homes plus the emergency vehicles, potential staff and patients!
• Construction Traffic: The traffic generated by the construction phase will be extremely problematic. This quiet valley is nestled between two large hill sides. Any construction traffic noise would be echoed off the hills. Construction and delivery equipment would need to climb a steer entrance road at low gear. Any subsequent grading equipment will emit a loud back up beeping noise that will be heard from all LP1 units. This constant and increased traffic would irrevocably alter the safe, peaceful nature of the community.

• Commercial Traffic: The proposed development would bring increased emergency fire and ambulance calls as both are required to attend. These will bring unwanted noise and light pollution at all hours of day and night. Any commercial vehicles -- food deliveries, medical waste, trash, linen, etc., -- and potentially 90+ employee vehicles will funnel through a narrow street originally designed for residential traffic.

II. Security

• Security of the neighborhood would be compromised by this unwarranted, greedy assault on LP1 community. As this will open the neighborhood to non-residential traffic, we fear an increase in crime that has decreased since installation of LP1 security personnel. There is no way to regulate this increased traffic and guarantee the security of the neighborhood. This is a real concern.

III. The Proposed Non-Residential Development is Inconsistent with the Existing Residential Community

• Under The Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood.
• This parcel is zoned "medium density residential," at 2.61 units per acre. The Las Palmas Plan indicates this parcel was specifically approved for 8 units total. The developer now seeks a "conditional use permit" to allow development of a non-residential facility with a total of 105 units. This is inconsistent with The Las Palmas and Monterey County Plans, and should be opposed.

• The developer seeks to circumvent these plans by requesting an amendment for a non-residential use. Specifically, the developer asks you approve an amendment with the following language; "Assisted living facilities are not considered residential units (and should not be) subject to the residential limitation of the (Las Palmas) Plan." An assisted living facility is not a residential use, because it does not operate or function in a manner like independent residential units.

• Las Palmas is a highly desirable residential community with stable property values. Residents fear the loss of their investment potential from a rush to get out of LP1 due to the nature of this development. Several friends have moved out fearing this project.

• To approve this amendment to the Las Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community.

IV Intrinsic Values: Development of this size will alter our environment.

• The location in question has 80+ eucalyptus trees that will be removed under current plan. These provide reduction in wind, ridgeline exposure and Hwy 68/RR sound abatement.

• Moreover, these 70+ year old eucalyptus trees are home to several generations of Red Tailed Hawks and Great Horned Owls. Last year we had an overabundance of Vols (large field mice) which were

running around even in daylight. These essential predators were active in Vol reductions. Watching these great birds soar and perform aerial ballets over our hillsides is unmatched in Salinas proper.

• Bobcats and deer live up on the hillsides and flats of the area in question. Last year one female bobcat brought her 3 cubs out into our common area multiple times. This was a delight of all who caught this rare event. One mother deer has birthed 5-6 pairs of babies over the last few years and we have watched them grow into adulthood.

• Destabilization of the steep hillsides in question is a serious threat to mudslides. We have experienced similar abundant rain-slide events even without any development activity.

• There is a sense of fear in LP1 that is unparalleled in my 15 years in the community.

• Would you want this development to go forward next door to your home?

• Light Pollution: We currently are able to view changing of the planets and star constellations due to our unpolluted dark areas. This will stop under the PLN#1500372.

• Noise: A friend who worked to help develop a similar nursing home in Hollister indicated the potential of "Screamers" being heard in the night is real. She later regretted helping this proposal from just this perspective.

• Smells: As this proposed facility will generate substantial numbers of meals, we will not enjoy sharing their menus due to prevailing winds.

I request you support the Las Palmas Community as originally intended for its residents and turn down the proposed development of Riverview at Las Palmas (PLN#150372).

Thank you for your consideration.

Sincerely,

Kent Tegtmeier,
Las Palmas 1 resident

Letter 33

COMMENTER: Kent Tegtmeier

DATE: March 29, 2018

Response 33.1

The content of this letter is the same as the content of Letter 32. Please refer to Responses 32.1 through 32.13 above.

March 30, 2018

Letter 34

From: Greg and Marie Cater
17783 Riverbend Rd.
Salinas, CA 93908

To: Mr. Carl Holm, Planning Director
Mr. Brandon Swanson, Planning Manager
Mr. Joseph Sidor, Assoc. Planner

Re: PLN # 150372—Riverview at Las Palmas

Dear Gentlemen:

We have been residents of Las Palmas since l989. Our reasons for locating here were to experience the quiet, safe and friendly neighborhood. 34.1

We feel that the proposed development of Riverview at Las Palmas (PLN# 150372) will seriously disrupt our peaceful community with excess traffic, potential accidents, and safety and security issues. This development will compromise the beauty of our hillsides and our neighborhood.

We strongly urge you to find an alternate location for this proposed senior housing facility.

Sincerely,

Gregory H. Cater, D.C.
Marie A. Cater

Greg and Marie Cater

Letter 34

COMMENTER: Greg and Marie Cater

DATE: March 30, 2018

Response 34.1

The commenters urge that an alternate location be found for the project, due to concerns about traffic, safety, and aesthetics.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response F for a discussion of visual character impacts. As stated therein, impacts to aesthetics would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classifications , and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access. Salinas Valley Memorial Healthcare, the nearest hospital to the project site, is approximately five miles from the project site.

March 31, 2018

Letter 35

Dear Mr. Sidor,

We are extremely concerned about the proposed project (PLN#150372). Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety, and security problems in our quiet neighborhood. Further, the large number of housing units proposed for this development, along with its clear commercial use, is inconsistent with the residential atmosphere that we chose when we moved to Las Palmas 1. 35.1

We strongly urge Mr. Shingu, the developer, to find an alternate location and access for his proposed facility.

Please respond to the issues we listed above in writing.

Sincerely,

Roberta Sonniksen

Roberta Sonniksen

Theresa Sonniksen

Theresa Sonniksen

Letter 35

COMMENTER: Roberta and Theresa Sonniksen

DATE: March 31, 2018

Response 35.1

The commenters urge that an alternate location be found for the project, due to concerns about traffic, safety, and land use incompatibility.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response C for a discussion of land use compatibility. As noted therein, the project would be consistent with LPRSP policies.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access. Salinas Valley Memorial Healthcare, the nearest hospital to the project site, is approximately five miles from the project site.

Received by RMA-Planning
on April 2, 2018.

Letter 36

Jeffrey C. Dittrich
17570 Winding Creek Road
Salinas, CA 93908
(831) 594-6477

I am a homeowner and resident in Las Palmas. I am opposed to the planned project known as Riverview At Las Palmas and I have serious objections to the validity of the to the draft SEIR regarding that plan. My objections include but are limited to the following points. 36.1

1. "MITIGATION" WILL NOT WORK: The review cites various violation of the California Environmental Quality Act but proposes "mitigation" of those violations. Any such "mitigation" is illusory at best because they would be unenforceable in any practical sense. 36.2

It is not stated who, and by what means, any proposed "mitigation" will be enforced upon the builder. The only possible method would be by lawsuit which are very expensive. It is unlikely that the County would bear the burden of such a lawsuit. It is unlikely that any individual homeowner or resident would have the legal standing or even the resources to carry such a lawsuit forward. On a very practical level such "mitigation" may never take place and once completed any possibility of enforcement will be ended.

The current land owner who is proposing this project is currently offering the property for sale. It is highly unlikely that any subsequent owner would be required by anyone to continue or maintain any "mitigation" completed during the project. Any promises to pay for added security, traffic relief, safety of children, fire protection or any aesthetics of the area would be worthless once the property is sold. 36.3

2. AESTHICS: I can see that the proposed structure would interfere with the view of the ridge line. The proposed "mitigation" will not answer the problem for the reasons stated above. For adequate fire protection the project will have to build water tanks capable of flowing even if the electric service is interrupted. That means that the water needed for fire protection will have to flow by gravity. The only way that can be accomplished is by placing the tanks above the building roof level. This will further obscure the ridge line view. 36.4

That facility will substantially change the character of the neighborhood. The residents of Las Palmas I have worked diligently to maintain a quiet, peaceful, and safe neighborhood good for families. In the past we have incurred substantial expense to keep out development of the park near the front of the neighborhood. We bought our homes relying on the current land use plan which limits use of the land on which the proposed project is supposed to go. To allow such an abomination to come into our neighbor hood would destroy the quiet character we enjoy.

3. TRAFFIC PROBLEMS: The amount of traffic will increase greatly. The number of employees is not certain but will be substantial. With three shifts of round-the-clock care givers and other employees will unfairly burden the resources of the current residents. The main road in and out of Las Palmas I takes all traffic by the largest play area for our children. That is a safety issue that cannot be resolved by the plan. The increase in noise is also a problem. 36.5

The plan calls for mitigation by having vans pick up and deliver employees who park elsewhere but there is no statement as to where those employees will park. The plan assumes that parking can be found at a reasonable price. It assumes that the employees will actually use the vans as proposed. Since the employees could come from various directions, either there will be multiple parking and pick-up areas or some of the employees will be required to drive past Las Palmas to get to the designated parking and pick-up areas. It seems unlikely that employees will do so. There is no public bus service that would go from River Road to the new facility at the top of the hill. Employees will have to drive. If this shuttle van plan does not work for any reason, there is nothing the residents of Las Palmas I will be able do about it once the project is complete.

One of the traffic issues regards emergency vehicles. When a resident of one of these nursing/retirement homes falls out of bed or has any medical emergency at any time of the day or night, an ambulance is called and the fire service responds with paramedics and such to safely deal the incident. This means that two emergency vehicles with lights and sirens will have to come into Las Palmas I at various times of the day and night. Such will be very disturbing to the current residents living in Las Palmas I.

4. SECURITY: Currently, the residents of Las Palmas I pay for a gate guard to carefully regulate traffic coming into Las Palmas I during daylight hours. The guard shack is just inside the main entrances. Currently, most of the time there is sufficient room for vehicles to line up for the guard to determine whether those vehicles should pass. If the traffic through that gate is increased substantially, it will cause a traffic back-up onto River Road and it will discourage the gate guard from doing the careful job done at this time. This issue matters. Currently Las Palmas I enjoys a great safety record. Daylight crime in our area is almost non-existent compare to that in Las Palmas II and Toro Park, the nearest similar neighborhoods. To keep the same level of protection would require more guards. Any promise by the project owners to assist in the added expense would be worthless once the project is built for the reasons stated above. 36.6

5. FIRE PROTECTION: The nearest fire station is at Toro Park. On most days and nights, the fire station is manned by two or three firefighters. This staffing is adequate for most house fires in our area. Such fires would involve single houses and single families. If this project is completed, those two or three firefighters would have to evacuate many mentally or physically disabled old people in a very short time and fight any fire. It cannot be done. The next fire unit is too fare away to provide any practical assistance to the situation. Also, although unlikely, if a fire did break out in the nursing/retirement home when the Toro Park fire unit was otherwise engaged, the response time by the next nearest unit would be too late. 36.7

As alluded to above, substantial water storage will be needed to make any fire sprinkler system work. Normal flow from water pipes to a facility high on a hill will not be enough to fight a fire. To rely on electric pumps in a fire is folly. The only practical solution would be to establish a gravity fed system which would require tanks above the facility.

If a grass fire were to break out in our area that facility would be a sitting duck. Fire runs uphill and it is at the top of the hill. We live in a high wind area which means that any fire nearby would be pushed by that wind. In summary, it would be foolish to place a nursing/retirement

home in the location proposed. It should be one flat land easily reached by fire equipment and water needed to fight any fires.

6. COMMENT BY PUBLIC AGENCIES: The plan does not include any input from any local public agencies to include the fire service and Sheriff 's Office. Please note that the nearest hospital is Salinas Valley Memorial Hospital which is a long way away from us. Current residents are in relatively good health and ambulance runs to a hospital are rare. That would not be the case if this facility is completed and occupied. 36.8 36.9

SUMMARY:

This project is the wrong use of the land available. It will require abrogation of the County Government's responsibility to uphold the current land use plan. To do so would be to break faith with the current residents who have placed their faith in the promises made in that plan. 36.10

JEFFREY C. DITTRICH

Letter 36

COMMENTER: Jeffrey C. Dittrich

DATE: April 2, 2018

Response 36.1

The commenter states that they are opposed to the project and has concerns about the Draft SEIR.

The commenter's opposition to the project is noted and herewith shared with County decision makers for consideration. The commenter's individual comments related to the adequacy of the Draft SEIR are addressed below.

Response 36.2

The commenter states that the project's mitigation measures would not be enforced.

The Draft SEIR analyzes the potential environmental impacts of the proposed project, and identifies mitigation measures for significant impacts. To receive project permission from the County, the applicant would be required to commit to all mitigation measures listed in the Draft SEIR, as well as any additional conditions of approval required by the County. A Mitigation Monitoring and Reporting Program (MMRP) would be adopted by County decision makers concurrent with EIR certification and project approval. The County routinely monitors mitigation measures and conditions of approval through documentation and inspection processes. Documentation of mitigation measures and conditions of approval is made public through the County Planning website.

Response 36.3

The commenter states that the project site is listed for sale, and that a new owner of the property would not comply with mitigation measures.

A new owner of the property would assume responsibility for compliance with the project's mitigation measures and conditions of approval, if the project is implemented. A property sale would not diminish the County's ability to enforce mitigation measures and conditions of approval.

Response 36.4

The commenter states that the project would obstruct views and change the character of the neighborhood.

Please refer to Topical Response F for a discussion of view obstruction. As stated therein, impacts to private views would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting. Please refer to Topical Response C for a discussion of neighborhood character and quality of life. As described therein, neighborhood fit and quality of life are not environmental impacts and are not directly analyzed in the Draft SEIR. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

Response 36.5

The commenter states that the project would increase traffic, which would impact safety and increase noise, and that the proposed shuttle service might not be effective at mitigating traffic impacts. The commenter states that there would be traffic-related noise and light pollution impacts, including from emergency vehicles accessing the site at night.

Please refer to Topical Response D for a discussion of traffic. As noted therein, the project would have a less than significant impact on traffic conditions in the Subdivision. Safety and noise resulting from increased traffic are addressed in Topical Responses A and H, respectively.

As stated on page 9-23 of the Draft SEIR, the shuttle service plan is required to be submitted for review and approval to Monterey County prior to approval of any building permits on the project site. This applicant proposed measure would further reduce impacts to Subdivision streets, which would not experience a significant traffic impact under the proposed project. This measure would not mitigate impacts to SR 68, which were identified as significant and unavoidable.

Response 36.6

The commenter states that the project would compromise the Subdivision's private security gate operations.

Please refer to Topical Response D and Response 32.3. Las Palmas Road has enough capacity to accommodate additional trips generated by the proposed project without resulting in substantial queuing in front of the gate, or in blockage of vehicles turning into or out from Winding Creek Road. As a condition of approval of the project, the County would require employees at the senior living community to display windshield tags. This condition of approval would eliminate the need to check each employee's vehicle, reducing the length of queues at the gate. Because queues would not be significantly increased as a result of the project, the gate guard could continue to monitor entrances to the Subdivision.

Safety and security are further discussed in Topical Response A.

Response 36.7

The commenter describes concerns related to fire protection, fire risks, and emergency evacuations.

Please refer to Topical Response A and Topical Response B. As noted therein, Section 11.9, *Public Services*, has be revised to note that the MCRFD reviewed the proposed site and building plans for the project as part of the County's review process and determined that a fire flow rate of 1,500 gallons per minute at a pressure of 20 pounds per square inch for a duration of up to three hours would be sufficient for the project. Furthermore, the MCRFD determined that implementation of the project would not require new or expanded fire protection facilities. Furthermore, the proposed site plan has been designed to comply with the County's fuel modification standards (Title 18, Chapter 18.56.090 *Fuel Modification Standards*) to minimize potential wildfire hazards on the project site and vicinity.

Response 36.8

The commenter expresses concerns about fire and police service.

Please refer to Topical Response A and Topical Response B. As noted therein, Section 11.9, *Public Services*, has been revised to clarify that the project would have a less than significant impact on fire

and police protection services, and no impact on schools and other public services. Implementation of the project would not require new or expanded public facilities to continue providing the existing level of public services experienced by residents in the vicinity of the project site. For additional detail refer to Topical Response A and Topical Response B, which provide analysis related to fire and police services, based on correspondence with the MCRFD and Monterey County Sheriff's Office.

Response 36.9

The commenter states that the nearest hospital is far from the project site. The commenter also speculates the state of health of existing residents and project residents.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR, and proximity to a hospital is not an environmental issue. The proposed location offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access. Salinas Valley Memorial Healthcare, the nearest hospital to the project site, is approximately five miles from the project site. Refer to Topical Response A and Topical Response B, which provide additional analysis related to public facilities.

Response 36.10

The commenter states that the project would not be an appropriate land use for the site.

The commenter's opinion is noted, and herewith shared with County decision makers for consideration.

April 2, 2018

Letter 37

RECEIVED
APR 16 2018
Monterey County RMA

Monterey County Planning Commission
Mr. Brandon Swanson, Planning Manager
Mr. Joseph Sidor, Associate Planner

Re: Riverview at Las Palmas PLN#150372

Gentlemen:

We are opposed to the proposed development of Riverview at Las Palmas. My wife and I do not feel the proposed business fits into our community. The project threatens our safety and reduces the value of our home. Why should we reduce the value of our homes so investors of RVLP can profit from their tax foreclosure windfall? The following observations are the reasons why we oppose the project. 37.1

Fire Safety

- A senior living project in Pennsylvania of approximately the same size as RVLP just went up in flames killing serval residents and injuring many others. 37.2

WEST CHESTER, Pa. (WPVI) --
Investigators now say last month's deadly fire at a senior living community in West Chester likely started in a covered outdoor patio area in the rear of one of the buildings.

- Local residents across the street from the facility were helping the people who couldn't walk or crawl get away from the conflagration.
- Sometimes, the best fire safety plans fail. This is the result. The RVLP hilltop location is not a fit for a senior living facility. It's not even a good fit for single family homes. That's why the RVLP investors got such a good price. The property has no utility.
- This was structured the same as RVLP except RVLP has only one road for ingress and egress.

- **Please do not let this happen in our Las Palmas 1 community.**

Air Quality

- AQMD monitoring station is located 6 miles south west of Parcel Q and measures an urban environment.
- The dust and debris blowing from the farm fields and grass lands adjacent to RVLP are not accurately reflected by measuring sidewalks, streets and buildings in the middle of Salinas.
- We are adjacent to about 10 miles of farm fields with seasonally blowing wind.
- I believe the particulate count would make this a poor location for elderly patients whom may have respiratory vulnerabilities. **This is not the right place for elderly residence.**

37.3

Aesthetics

- We can see the RVLP bluff from Highway 68, Spreckles Blvd., Historic River Road, and even from Blanco Road while turning onto highway 68.
- We tried to identify Las Palmas 1 but could not see it, as it was below ridge line.
- A two story facility will become an eye sore because it is inconsistent with the surrounding environment. **RVLP will change Salinas Valley forever and cannot be un-done.**

37.4

Storm Water Runoff

- Prior developer, installed concrete retaining barrier on the LP1 side to mitigate "toe-outs" during winter storms; however, he avoided building upon prime lots to avoid destabilization of the hillside. Now, RVLP plans to build a hospital there?
- What will happen when the root structures of 90 eucalyptus trees are destroyed by removal to make room for this proposed business?

37.5

- The hillside is vulnerable to slides. A couple of our neighbors experienced a slide during February 2017. Two homes were almost inundated by mud rolling to their back fences.

Please do not allow RVLP to build on top or a hill that has proven to be unstable.

RVLP DOES NOT FIT IN OUR COMMUNITY

We are strongly opposed to the builder using our private entrance.

- The security at our private entrance is currently facing issues turning away non – residents.
- Sharing our entrance with the Riverview business will further threaten the safety of our children and neighbors.
- Our HOA is not able to provide 24 hour protection for our residents. We have safety concerns for our families and personal property during the unprotected hours and heavier traffic generated by RVLP.

37.6

We are strongly opposed to moving 140 patients plus staff adjacent to our residential community.

- Residents of RVLP will not be able to walk within our private community because they do not belong to the HOA and pay dues to maintain the streets and walkways. Plus they may not be able to get back up the hill.

37.7

- What happens should River Rd. flood as it has in the past? Or, what would happen should there be a fire like at the senior living community Pennsylvania last November?
- How many people would have to die or be injured before it's proven the wrong location for RVLP?

37.8

We are strongly opposed to building a business within our residential community.

- Service trucks, delivery trucks, staff members and visitors will have 24 x 7 x 365 access to our homes.

37.9

- The RVLP business does not fit with our kids riding a toy jeep in the streets, children shooting baskets or families walking to our park. A business needs to be with other businesses.
- We question whether or not the hill can be successfully mitigated to accommodate the winter storms and the wind blowing unrestrained because 90 eucalyptus trees were removed.
- One plugged storm drain collecting 4 acres of rainfall can wash away a lifetime of neighbor's memories because they live next to the proposed business.
- What happens to the eyesore along historic River Road if the RVLP business fails? Maybe a place for a homeless encampment or a crime magnate?
- LUAC recommended that the project not be built because it was not a fit. Their vote reflects how more than 300 homeowners at Las Palmas 1 feel about RVLP.

WE URGE YOU TO DISAPPROVE THE RVLP PROJECT AND URGE THEM TO FIND AN APPROPRIATE LOCATION FOR THEIR BUSINESS.

The previous planner lost our first letter. We want the county to know that we are very serious about opposing this business and do not want our opinions ignored. We are looking forward to your responses to the concerns and questions we raised.

Best regards,

David and Irmina Ratliff
17759 Riverbend Road
Salinas, CA 93908

Cell- 831-600-5022

Letter 37

COMMENTER: David and Irmina Ratliff

DATE: April 2, 2018

Response 37.1

The commenters state that they are opposed to the project, citing safety and property value concerns.

The commenter's opposition to the project is noted and herewith shared with County decision makers for their consideration. Safety and property value are discussed in Topical Responses A and C, respectively.

Response 37.2

The commenter describes fire safety concerns and compares the project to a project in Pennsylvania that suffered a fire.

For a discussion of wildfire impacts, please refer to Topical Response B, which includes analysis added to the Final SEIR addressing wildfire hazards. Impacts related to wildfire and fire protection would be less than significant.

Response 37.3

The commenter states that the project site is a poor location for housing seniors due to air quality concerns related to nearby agriculture.

The comment refers to air quality impacts from sources other than the project. Note that the Draft SEIR analyzes impacts of the project on the environment, rather than impacts of the environment on the project. For additional discussion refer to Response 30.6.

Response 37.4

The commenter states that the project would be an eyesore because it would be inconsistent with its surroundings.

Impacts to scenic vistas and visual character are discussed in Section 5.0, *Aesthetics,* of the Draft SEIR. In addition, as noted in Topical Response F, taking into account the limited visibility of the project site from public viewing areas, the project would not be considered ridgeline development given vegetative shielding, intervening topography, and the mitigation measures to reduce visual impacts.

Response 37.5

The commenter discusses the instability of the hillside and its vulnerability to slides.

Please refer to Topical Response E. As noted therein, 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, including slope stability and landslides.

Response 37.6

The commenter states that the project would compromise the Subdivision's private security service and cause safety risks.

Please refer to Topical Response A for a discussion of safety and security.

Response 37.7

The commenter states that residents of the senior assisted living facility would not have the right to walk on the Subdivision's private streets.

Please refer to Topical Response I. As noted therein, a written agreement between the LPHOA and the applicant would be necessary in order to clarify shared costs and responsibilities for streets that are under the control of the LPHOA. Such an agreement is not currently in place. It is outside of the scope of the Draft SEIR to facilitate an access agreement between the applicant and the LPHOA.

Response 37.8

The commenter discusses concerns related to fires and floods.

For a discussion of wildfire impacts, please refer to Topical Response B, which includes analysis added to the Final SEIR addressing wildfire hazards. Impacts related to wildfire and fire protection would be less than significant.

Please refer to Topical Response E for a discussion of the project's potential to contribute to off-site flood hazards. As noted therein, the project would not result in significant impacts related to flooding.

Response 37.9

The commenter reiterates concerns related to traffic, safety, land use incompatibility, slope stability, and aesthetics.

Please refer to Responses 37.2 through 37.8 above. The commenter's opposition to the project is noted and herewith shared with County decision makers for their consideration.

Received by RMA-Planning
on April 4, 2018.

Letter 38

Hello Joe,

I wish to share some observations on the process I have experienced as a customer of RMA/Planning interactions over the last 30 months.

38.1

My wife Nancy and I purchased our home in Las Palmas I in 1998. I retired in 2003 after a 25-year career at 3M, where I managed an Electronic Product Development group. My responsibilities included management of up to 45 professional technical people, mostly degreed and many with advanced degrees. I am therefore used to reading professional reports and place great value in robust business processes coupled with a data based approach and sound reasoning.

Background:

I have followed the RVLP project closely since October 2015, when I first became aware by way of the first LUAC meeting at TORO Park. Along these 30 months, and especially as I reviewed the subject DSEIR I became increasingly uneasy with some RMA process and procedural aspects. What follows in this cover letter highlights a number of concerns. My comments are not directed at you personally. I am aware that several RMA staff members including you, Mr. Mason and Mr. Connolly, handled this project. I am sure you had a full plate before you inherited the RVLP project. My comments are process directed.

I am keenly aware of the high rate of turnover in RMA, including valiant attempts to recruit and retain key staff, like traffic engineers. However, as difficult as these challenges are from the RMA end, the resulting communication consequences viewed from my end are troubling and I find the processing of this DSEIR seriously flawed. Clearly, there is loss of institutional knowledge evident to us outside RMA. Timely communications with RMA staff is a constant struggle. Information comes in fits and starts and only after repeated attempts to make contact. There are sudden jarring surprises along the way.

For example, Mr. Connolly had promised me a hand-off meeting with his replacement for continuity, but that sadly never happened before he left for Ojai. I discovered his departure only after repeated attempts to contact both him and then Jacqueline Onciano. I found this communication lapse unprofessional.

I understood from several conversations with Mr. Connolly that even though the Applicant had chosen the route he did to directly commission the work by EMC, Mr. Connolly assured me that RMA staff would **review and sign off** on this EMC generated ADEIR document PRIOR to its posting for Public Comment. Therefore, it is my working assumption as I view the posted DSEIR that RMA concurs with its content.

Please confirm my understanding; I could easily be wrong in my interpretation. Assuming I am correct, I will make some further observations on the process as I experienced it in the next few paragraphs. My detailed CEQA/DSEIR based comments will shortly be submitted to you in a separate letter.

Serious Omissions and Implications

38.2

- **No LPI Participation in Scoping Meeting** Prior to the NOP phase of the project (Spring 2017) homeowners in Las Palmas were told by Mr. Connolly that we would be invited to a "scoping" session to provide input along with Agencies into what needed to be addressed as the Administrative EIR work was commissioned. This never happened. Instead, there was a sudden last minute meeting scheduled where Mr. Connolly was the only representative from RMA, no

agencies attended and the meeting objective was hastily reframed as a "Community Outreach Meeting" where Mr. Connolly was hard pressed to provide any concrete information on the likely sequence of events. Community Outreach Meetings are not on the CEQA Process Flowchart; Scoping Meetings are……This "informational" meeting was at the Portola Fire Station and the conference room was filled standing room only with concerned LPI attendees who expected to participate in a Scoping meeting. It was a serious disappointment.

- **Planning Review not Evident** In Fall 2017 I obtained a copy of the 7/24/ 2017 ADEIR as prepared by EMC through a Public Record Request. Fast forward to March 2018 when the DSEIR was posted on the RMA website for Public Comment. I can find no visible indication that the DSEIR was critically reviewed by the County prior to posting for Public Comment. With the exception of the document dates, some minor formatting text shifts and a missing set of pages (3-14 to 3-34; tables dealing concerning Consistency With Applicable Plans) I can detect no difference in substance between the ADEIR as submitted to the County on 7/24/2017 and the posted version dated 1/29/2018. Am I correct? If so, where is the RMA content review and analysis? Does RMA support the claims and assertions? 38.3

  Quoting from CEQA, Title 14, Article 7 "*e) Before using a draft prepared by another person, the Lead Agency shall subject the draft to the agency's own review and analysis. The draft EIR which is sent out for public review must reflect the independent judgment of the Lead Agency. The Lead Agency is responsible for the adequacy and objectivity of the draft EIR."*

  Note: Authority cited: Section 21083, Public Resources Code; Reference: Section 21082.1, Public Resources Code. Why was this document posted for Public Comment without RMA analysis evident? I may have missed something please point it out.

  Further, where is RMA Counsel Review regarding the rather bold Land Use claims and the proposed amendment to the Las Palmas Specific Plan? Surely, RMA Counsel must weigh in on the various claims about zoning, easement, and conformance to LPSP, etc. Are we to understand that RMA endorses these?

- **Claims Unchallenged** The claims made by the Applicant, and summarized in the NOA, state that the large number of Potentially Significant Environmental Effects are either " less than significant or can be mitigated to a less than significant level". These are empty and ludicrous assertions. Frankly, such a multitude of one-sided claims is insulting our collective Las Palmas I community intelligence. Not challenged by Planning or Agencies, this DSEIR gives the impression that Planning tacitly supports these ridiculous assertions. Can this be accurate? 38.4

  The additional claim that Transportation "poses impacts that are significant and cannot be mitigated to a less than significant level" is most troublesome. Are we then to live with this bizarre conclusion? The immediate impression generated by these absurd claims is that the Applicant believes that he can mitigate this clearly non-conforming project into compliance, and that there is no recourse to worsening the traffic situation in the County. 38.5

- **No Traffic Engineering Review** Where is the technical review by County Traffic Engineering resources of The Higgins report pp. 351 - 368 of 482 in Appendix (A-G combined)? Was consideration given to the turmoil that will surely affect the Las Palmas I internal streets? These issues are broader than LOS calculations and considerations. Las Palmas I residents currently use 38.6

these streets to stroll, walk their dogs and our children play there. There are sidewalks only on one side of the street in the easement area of River Run and Winding Creek. The lives of our children are involved. Please consider a site trip beyond an inspection of Parcel Q that includes walking the streets in Las Palmas I near the proposed project site.

- **No Closure on Incomplete Status – No Reports** There are internal RMA letters in file PLN 150372 from Ryan Chapman to Steve Mason and Dale Ellis during earlier stages of review where Ryan points out significant gaps in the Applicant supplied Traffic information. Ryan's conclusion then was that the Application was "Incomplete". I understand Ryan and his successor Mohammed have sadly both moved on but the issues remain. I have yet to see confirmation that the "Incomplete" status has been resolved. How does RMA Staff critically evaluate important Transportation issues and reports without expert and unbiased Traffic Engineering resources? The link to both Traffic Reports in the Appendix lead nowhere, along with two other technical reports that similarly go nowhere. Why release the DSEIR for comment without these vital inputs? 38.7

- **Key Dates Section Incomplete** There is no mention in the Key Dates section of the NOA referencing the unanimous TORO LUAC recommendation from 9/26/2016. Mr. Connolly (and 35 LPI residents) attended this meeting so I am mystified why there is no reference to this important milestone in the DSEIR. 38.8

- **TORO LUAC Ignored** I appreciate LUAC can only offer a recommendation, but according to the DSEIR it is as if it never happened! Surely, the finding of this body must be a key project milestone. Otherwise, why bother asking LUAC for input? From the LUAC minutes of 9/26/2016*: "Change project to adhere to the Las Palmas Specific Plan which, according to County records of housing units already built, will allow three single family dwellings to complete the build-out of Las Palmas. As proposed, this is a commercial project, and is inconsistent with the residential neighborhood."* 38.9

- **Submitted Documents Absent and Ignored** I can find no indication anywhere in this DSEIR (297 pages + another 432 of appendices) that the Las Palmas neighborhood concerns are included and considered. It is as if we do not exist! PLN 150372 should contain a package I submitted in mid-2016 with 165 signatures obtained from the LPI neighborhood indicating <u>93% opposition to the project.</u> These data were also appended to the LUAC minutes (9/26/16 – appendices 2 and 3) as submitted by Beverly Bean to Melissa McDougal. Where is this critically important Las Palmas I input? Why is it not in the NOA Appendix? Other than a single Mr. McNeil letter and two reports (Dalby and Gobets), where are the other letters written by LPI residents from 2016? There should be many more! I have record of at least 31 and know there were many more submitted. Their absence from the NOP does not build trust in a transparent review process. 38.10

- **Agency Input Absent** Other than Public Health, where are the other Agency reviews? Water Resources? Fire Prevention? Caltrans? Public Works? Emergency Services? TAMC? I believe 38.11

these Agencies' comments must be incorporated into the DSEIR prior to its posting for Public Comment to aid our lay understanding of the issues. If my understanding is incorrect, please state so.

From these glaring omissions in the documentation one can easily speculate that the publication of this DSEIR is a rushed attempt to promote and expedite the Applicant's case and ramrod this project forward despite its deeply flawed objective. Is the "CEQA process" merely a rubber stamp for developers? This DSEIR does not inspire any confidence in the "process". 38.12

It is strikes me that the entire burden of DSEIR review is on the shoulders of our Las Palmas I community and how well we challenge this clearly non-conforming project. Where is RMA in all this? As a layperson, I need to see commentary by RMA professionals before I can intelligently comment myself.

I believe that the Applicant and I are both customers of RMA Planning services. My comments are critical of the entire process and system as experienced by me over the last 30 months. If these comments have substance, I trust we can have further discussion with you and your management to resolve the issues. Where I may be off the mark, please point this out.

Respectfully submitted,

Roy Gobets

Letter 38

COMMENTER: Roy Gobets

DATE: April 4, 2018

Response 38.1

The commenter provides background information on the project and commentary on County planning procedures.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration. Prior to circulating the Draft SEIR for public comment, County departments and agencies reviewed the Draft SEIR submitted by the applicant, and made changes as necessary to clarify information and facilitate public review. The environmental document circulated by the County represented the County's independent judgement and analysis.

Response 38.2

The commenter states that Subdivision homeowners were not included in a scoping meeting for the project.

Per the CEQA *Guidelines* Section 21083.9, a scoping meeting is required for projects that "may affect highways or other facilities under the jurisdiction of the Department of Transportation if the meeting is requested by the department" or if a project is "of statewide, regional, or areawide significance." The California Department of Transportation (Caltrans) did not request a scoping meeting, despite potential impacts to SR 68. Additionally, the site is not of statewide, regional, or areawide significance. Pursuant to Section 15082 of the CEQA Guidelines, a scoping meeting is not necessary unless requested by the lead agency, a responsible agency, a trustee agency, the Office of Planning and Research, or a project applicant. None of these parties requested a scoping meeting pursuant to Section 15082.

Pursuant to Section 15083 of the CEQA Guidelines, a lead agency may consult directly with any person or organization it believes will be concerned with the environmental effects of the project. The County held a community outreach (i.e., informational and consultation) meeting on April 27, 2017, at the Monterey County Regional Fire Administration Building, 19900 Portola Drive, Salinas . The County mailed notices for the community outreach meeting to interested organizations and all property owners within 300 feet of the project location.

Response 38.3

The commenter states that there are no significant differences between the Administrative Draft SEIR, prepared by EMC Planning Group Inc., and the Draft SEIR released by the County.

The degree of revision performed on the Draft SEIR was at the discretion of the County. After circulating the Draft SEIR and receiving comments from both public agencies and the public, the County is able to again review and revise the Draft SEIR to incorporate new information and provide greater clarity where needed; this Final SEIR addresses concerns that have been raised and provides additional detail regarding multiple issues (refer to Section 2, *Topical Responses*).

As stated above, prior to circulating the Draft SEIR for public comment, County departments and agencies reviewed the Draft SEIR submitted by the applicant, and made changes as necessary to clarify information and facilitate public review. The environmental document circulated by the County represented the County's independent judgement and analysis. Minimal changes were made to the initial draft document because County staff determined the analysis to be adequate for public review and comment.

Response 38.4

The commenter states that the Draft SEIR underplays the significance of the project's impacts. The commenter states that the assertions in the Draft SEIR are not challenged by public agencies.

Analysis of environmental impacts in the Draft SEIR is based on the CEQA Appendix G checklist. Each environmental impact area has a set of thresholds of significance. The Draft SEIR provides significance determinations for each threshold, supported by substantial evidence. Please refer to Sections 5.0 through 12.0 for a discussion of environmental effects of the proposed project, which provides more detail than the Notice of Availability (NOA).

Response 38.5

The commenter expresses confusion about the conclusion that transportation "poses impacts that are significant and cannot be mitigated to a less than significant level."

This conclusion describes a significant and unavoidable impact, which is defined as an impact that cannot be reduced to a less than significant level with feasible mitigation measures. As described in Section 9.0, *Transportation & Traffic*, of the Draft SEIR, SR 68 currently operates at LOS F and Monterey County and Caltrans consider the addition of a single peak hour trip to be a significant impact when adding to a LOS F situation. Therefore, based on this threshold, the project would have a significant impact on the two-lane section of SR 68 between Toro Park and SR 218. There are no mitigation measures available to reduce project-level impacts to a less than significant level. Therefore, the impact remains significant and unavoidable.

Please refer to Topical Response D for further discussion.

Response 38.6

The commenter asks if the County reviewed the traffic report in the Draft SEIR, and expresses concern over impacts to internal Subdivision Streets.

Topical Response D discusses traffic conditions on residential streets. As noted therein, the project would have a less than significant impact on traffic conditions in the Subdivision, and no mitigation would be required.

The commenter also expressed concerns regarding impacts to internal subdivision streets. RMA-Public Works staff reviewed the DSEIR's Appendix D "Higgins Traffic Report", and the report contains a Neighborhood Street Analysis. This analysis states the following:

> *Woodbridge Court would carry all of the project's traffic, which is expected to total approximately 363 vehicles per day. This street would carry volumes well within acceptable levels for residential streets (Higgins 2017).*

Even though the additional vehicle trips associated with the proposed project would have less-than-significant impacts on the neighborhood roadway system, the applicant has proposed to implement

the following mitigation measures, which would reduce impacts to the traffic circulation in the vicinity of the project site.

> TRA-1 To reduce peak hour trip generation, specifically on SR 68, all employee shift changes for project site operations shall occur outside of morning and evening peak trip hours. A requirement to schedule all morning, day, and night shifts for project operations outside of peak hours shall be included as a condition of approval associated with the conditional use permit.
> TRA-2 To reduce overall trip generation to and from the project site, the project developer shall prepare a detailed plan for shuttle service. Shuttle services shall be offered to residents to access areas on the Monterey Peninsula and in Salinas from the project site. Additionally, shuttle service to nearby transportation hubs for employees shall be offered in the shuttle service plan. The shuttle service plan shall be submitted for review and approval to Monterey County prior to approval of any building permits on the project site.

Response 38.7

The commenter states that there are unresolved issues regarding the project's traffic analysis. The commenter states that traffic reports were not publicly available.

The applicant submitted the requested traffic analysis to RMA-PW staff for review. The analysis was sufficient to deem the project complete. This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration. A traffic report prepared by Keith Higgins, Traffic Engineer (dated June 20, 2017) was posted on the RMA public website as Appendix D under the Draft Subsequent Environmental Impact Report on the project web page. Two other traffic reports (dated March 12, 2014 and December 14, 2015) may be viewed via the County's Accela Citizen Access link on the RMA public website.

Response 38.8

The commenter states that the Key Dates section of the project's Notice of Availability (NOA) does not reference a Toro Land Use Advisory Committee (LUAC) meeting that discussed the project.

The NOA serves as notice that the County is seeking comment on the Draft SEIR. The key dates included in the NOA were March 12, 2018 and April 25, 2018, which were the start and end dates of the public review period. The NOA pertains specifically to the Draft SEIR and does not intend to provide a comprehensive timeline of the project's planning milestones.

Response 38.9

The commenter states that the Toro LUAC recommendation against project approval was not included in the Draft SEIR.

The Draft SEIR focuses on environmental impact analysis. All of the factors that the County may consider in approving or rejecting the project are not necessarily included in the Draft SEIR. County staff will address the LUAC's recommendation in the staff report submitted to the County's decision makers for their consideration.

Response 38.10

The commenter states that the Draft SEIR does not address the concerns of the Subdivision residents, which were expressed to the County in mid-2016 with 165 signatures noting opposition to the project.

This comment references a survey completed by residents of the Subdivision and submitted to RMA-Planning staff in January 2016, over one year prior to the circulation of the Notice of Preparation (NOP). The survey refers to traffic and security as the primary concerns of residents. Pursuant to the requirements of CEQA, the County prepared and circulated a NOP for the proposed project for 30 days from March 7 to April 7, 2017. The NOP and comments received from the public are included in the Draft SEIR at Appendix B. The County addressed the NOP comments and potential project impacts in the Draft SEIR, which was circulated for public review and comment from March 12 through April 25, 2018.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 38.11

The commenter states that county departments did not comment on the Draft SEIR.

RMA-Planning distributed an administrative draft SEIR for review and comment by other County agencies and departments; including RMA-Public Works, RMA-Environmental Services, Environmental Health Bureau, Water Resources Agency, Agricultural Commissioner, and Monterey County Regional Fire Protection District. Comments and revisions received from these agencies and departments were incorporated into the Draft SEIR, which was then circulated for public review and comment from March 12 through April 25, 2018. Typically, County agencies and departments do not comment on an environmental document during the public comment period. This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 38.12

The commenter states that the EIR process is flawed and rushed, for the reasons outlined earlier in their letter.

Refer to Responses 38.1 through 38.11 for responses to the commenter's specific concerns.

Letter 39

From: Eunice Kim Date: 4/4/18

Address: 21000 Country Park Rd. Salinas, CA 93908

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us

roygobets@aol.com , Roy Gobets 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Joe,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. 39.1

I strongly urge the developer to find alternate venue and access for his proposed facility.

Please respond to the issues I listed above in writing.

Respectfully,

X

Letter 39

COMMENTER: Eunice Kim

DATE: April 4, 2018

Response 39.1

The commenter states that they are concerned about the project due to impacts related to traffic, safety, and land use inconsistency. The commenter urges the developer to find an alternate location for the project.

Please refer to Topical Response D for a discussion of traffic and Topical Response A for a discussion of safety and security. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks. Please refer to Topical Response C for a discussion of land use consistency. As described therein, the project would be consistent with the site's zoning and land use requirements.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access. Salinas Valley Memorial Healthcare, the nearest hospital to the project site, is approximately five miles from the project site.

Letter 40

From: Yeo Keun Kim Date: 4/4/18

Address: 21000 Country Park Rd. Salinas, CA 93908

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us

roygobets@aol.com , Roy Gobets 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

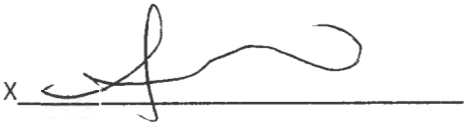
Hello Joe,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place.

I strongly urge the developer to find alternate venue and access for his proposed facility.

Please respond to the issues I listed above in writing.

Respectfully,

X 

Letter 40

COMMENTER: Yeo Keun Kim

DATE: April 4, 2018

Response 40.1

The content of this letter is the same as the content of Letter 39. Please refer to Response 39.1 above.

Letter 41

RECEIVED
APR 06 2018
Monterey County RMA

From: Yong JIN KIM Date: 4-4-18

Address: 21000 Country Park Rd. Salinas. CA 93908

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us

roygobets@aol.com , Roy Gobets 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Joe,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place.

I strongly urge the developer to find alternate venue and access for his proposed facility.

Please respond to the issues I listed above in writing.

Respectfully,

X_____

Letter 41

COMMENTER: Yong Jin Kim

DATE: April 4, 2018

Response 41.1

The content of this letter is the same as the content of Letter 39. Please refer to Response 39.1 above.

Letter 42

Received by RMA-Planning
on April 4, 2018.

Sidor, Joe (Joseph) x5262

From: Jan Neilson <janneilson14@yahoo.com>
Sent: Wednesday, April 4, 2018 10:37 AM
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103; roygobets@aol.com
Subject: RVPL Draft SEIR forProposed Development of Riverview at Las Palmas(PLN# 150372)

From: Mark Neilson
Sent: Wednesday, April 4, 2018 10:27 AM
Subject: RVPL Draft SEIR forProposed Development of Riverview at Las Palmas(PLN# 150372)

From: Mark Neilson Date: April 4, 2018
Address: 21044 Country Park Road, Salinas, CA 93908
To: Sidorj@co.monterey.ca.us
Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, (831) 755-5334 same physical address swansonb@co.monterey.ca.us
Jacqueline Onciano, Chief of Planning, (831) 755-5193, same physical address
oncianoj@co.monterey. ca.us
Carl Holm, Planning Director, (831) 755-4879, same physical address holmcp@co.monterey.ca.us
roygobets@aol.com , Roy Gobets (831) 235-1701 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr. Sidor,

My wife and I just purchased our home In Las Palmas 1 and were disturbed to learn about the plans to build a huge complex above our home near the hillside that is very fragile. I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will cause an immense increase in unacceptable traffic. Also the safety and security problems will increase in our peaceful neighborhood. 42.1

Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. We moved here for the peaceful atmosphere and open hillside views of wild nature and wildlife. This could also really harm the value of everyone's property.

I respectfully urge the developer to find alternate venue and access for his proposed facility. Please, please do not allow this major development to be built in this location overlooking Las Palmas 1.

Please respond to the issues I listed above in writing.

Respectfully,

X_ Mark R. Neilson_____

Sent from Mail for Windows 10

Letter 42

COMMENTER: Mark R. Neilson

DATE: April 4, 2018

Response 42.1

The commenter states that they are concerned about project impacts related to traffic, safety, land use inconsistency, and property values. The commenter urges the developer to find an alternate location for the project.

Please refer to Topical Response D for a discussion of traffic and Topical Response A for a discussion of safety and security. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks. Please refer to Topical Response C for a discussion of land use consistency. As described therein, the project would be consistent with the site's zoning and land use requirements.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access. Salinas Valley Memorial Healthcare, the nearest hospital to the project site, is approximately five miles from the project site.

Letter 43

Received by RMA-Planning
on April 4, 2018.

Sidor, Joe (Joseph) x5262

From: Jan Neilson <janneilson14@yahoo.com>
Sent: Wednesday, April 4, 2018 10:28 AM
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103; roygobets@aol.com
Subject: RVPL Draft SEIR forProposed Development of Riverview at Las Palmas (PLN# 150372)

From: Nicole Neilson Date: April 4, 2018
Address: 21044 Country Park Road, Salinas, CA 93908
To: Sidorj@co.monterey.ca.us
Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, (831) 755-5334 same physical address swansonb@co.monterey.ca.us
Jacqueline Onciano, Chief of Planning, (831) 755-5193, same physical address
oncianoj@co.monterey. ca.us
Carl Holm, Planning Director, (831) 755-4879, same physical address holmcp@co.monterey.ca.us
roygobets@aol.com , Roy Gobets (831) 235-1701 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr. Sidor,

My husband and I just purchased our home In Las Palmas 1 and were disturbed to learn about the plans to build a huge complex above our home near the hillside that is very fragile. I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will cause an immense increase in unacceptable traffic. Also the safety and security problems will increase in our peaceful neighborhood.

Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. We moved here for the peaceful atmosphere and open hillside views of wild nature and wildlife. This could also really harm the value of everyone's property.

I respectfully urge the developer to find alternate venue and access for his proposed facility. Please, please do not allow this major development to be built in this location overlooking Las Palmas 1.

Please respond to the issues I listed above in writing.

Respectfully,

X_ Nicole Neilson_____

Sent from Mail for Windows 10

Letter 43

COMMENTER: Nicole Neilson

DATE: April 4, 2018

Response 43.1

The content of this letter is the same as the content of Letter 42. Please refer to Response 42.1 above.

Letter 44

Sidor, Joe (Joseph) x5262

From: GLADYS ALLEN <gladys0535@comcast.net>
Sent: Thursday, April 5, 2018 4:32 PM
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334
Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Joe,

I am very concerned about the proposed project for the following reasons:

- Its proposed use of Las Palmas 1 roads will pose unacceptable traffic on both River Road and the entrance/exit to Las Palmas Ranch I. There is only one entrance/exit to Las Palmas Ranch I (Parkside area) which this project proposes to use. This entrance/exit currently serves approximately 145 residents, along with guests, landscapers, and delivery and maintenance persons. 44.1

- The proposed development would also cause security issues since nonresidents would be allowed on the premises. 44.2

- Safety issues In the event of evacuation due to fire or flood of the Las Palmas Ranch I (Parkside area). In past years there have also been mudslides on the hillside where the proposed development is to be built. Removal of the existing eucalyptus trees will only add to that instability. 44.3

- The large number of housing units proposed for this development is inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. 44.4

I strongly urge the developer to find alternate venue and access for his proposed facility. 44.5

Please respond to the issues I listed above in writing.

Respectfully,

Gladys Allen

21144 Country Park Road

Salinas, CA 93908

Letter 44

COMMENTER: Gladys Allen

DATE: April 5, 2018

Response 44.1

The commenter describes concerns over traffic and site access on Subdivision streets.

Please refer to Topical Response D, which discusses traffic conditions on residential streets. As noted therein, the project would have a less than significant impact on traffic conditions in the Subdivision, and no mitigation would be required.

Response 44.2

The commenter states that there would be security issues with nonresidents in the Subdivision.

Please refer to Topical Response A, which clarifies Section 11.9, *Public Services*, of the Draft SEIR, and explains that the project would participate proportionately in the cost of the Subdivision's security service.

Response 44.3

The commenter describes concerns about emergency evacuation and slope instability resulting from eucalyptus removal.

For a discussion of wildfire impacts, please refer to Topical Response B, which includes analysis added to the Final SEIR addressing wildfire hazards. Impacts related to wildfire and fire protection would be less than significant. Please refer to Topical Response D for a discussion of impacts on emergency evacuation. The project would not result in a significant impact on emergency preparedness within the Subdivision.

Please refer to Topical Response E. As noted therein, 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, including landslides.

Response 44.4

The commenter states that the project is inconsistent with the surrounding residential land use.

Please refer to Topical Response C for a discussion of the site's zoning and compliance with applicable planning documents. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 44.5

The commenter urges the developer to find an alternate location for the project.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

April 05, 2018

Letter 45

Janet Barstad
17560 River Run Road
Salinas, CA 93908

RECEIVED
APR 09 2018
Monterey County RMA

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901

C.c. Brandon Swanson, Planning Manager;
Jacqueline Onciano, Chief of Planning
Carl Holm, Planning Director
Roy Gobets, Las Palmas Ranch Homeowner

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr. Sidor,

For many years I have been enamored of the Las Palmas Ranch country side/neighborhood setting, and I am passionate about this community in part due to my long history of interaction with Las Palmas Ranch. My husband, Alden Barstad, was the Planner for the Las Palmas Ranch Partnership dating back to 1979. I can vouch for the many meetings held in our conference room; the many months drawing and revising Site plans, etc. I personally over saw the first exterior renovation of the historic Corey House. Our son, now a general contractor, was part of the crew to remove the shingles prior to reroofing. Finally, in May of 2014, I moved into my home on River Run Road to enjoy my retirement and to be close to my daughter who is also a LP1 resident. Mine is the first house (single story) to the right as you approach River Run Road from the Las Palmas Parkway. 45.1

As a homeowner and active community member, I have grave reservations about the development of Riverview at Las Palmas which is being proposed for your consideration. While there are many areas and points of view to consider in this complex project, I wish to focus my comments on three highly sensitive environmental concerns:

1. **Waste Water Treatment**
   When Las Palmas Ranch was originally developed, the existing waste water facility off River Road, just south of the Kinship Center, was incorporated into the Las Palmas Ranch Plans at the direction of Mr. Wong, the director of the Monterey County Public Works Department. It was paid for (at least in part) by the LPR home buyers. My monthly bill is $119.00 every month, 250% more than single family residential bills under the MRWPCA. The additional waste water treatment requirements for the proposed RVLP Commercial Use Facility could be expensive, and should in no way impact cost or quality to Las Palmas Ranch residents. 45.2

2. **OPEN SPACE**

The grassy open space at the entrance to Las Palmas 1, more commonly known as Corey Park, was saved from commercial development in 1995 by the Las Palmas Ranch 1 homeowners when they secured 3.23 additional acres (spending more than $300,00.00.). This strategic purchase had two specific intents: (a) to prevent Commercial Development, maintaining Las Palmas Ranch as a private gated residential community, and (b) to enhance the enjoyment and safety of residents, both adults and children, alike. Today it provides a handsome foreground to Corey House as well as a favorite spot for pet owners to congregate and children to play. The impact of at least 300 plus vehicle trips in and out of RVLP, DAILY would virtually obliterate the use of Corey Park as a green space for our community. 45.3

Those vehicles would travel immediately in front of my home. The very increase in the traffic is the reason homeowners rescued the land that is now Corey Park. I might add, to increase safety as well as privacy, Utretsky Security was engaged; a gate house was installed and staffed from 8 am to 4 pm, seven days a week. Security personnel patrol our streets each evening. These services are paid for through each homeowner's monthly assessment.

3. **TRAFFIC IMPACT MITIGATION**

When Parcel Q was sold originally, it was zoned Residential Use, with access rights through the front main entrance of Las Palmas 1. Traffic safety has long been a concern in this development, and Las Palmas Ranch Residents worked long and hard to get a traffic light installed. As previously mentioned, the homeowners pay for private security service through our monthly dues. That service plays a vital role in monitoring traffic entering our neighborhood past the Guard House, with the Guard checking out each and every vehicle and driver. 45.4

Granting approval for this commercial development on the door step of our quiet residential community is not consistent with a neighborhood of single family homes. The developer has estimated 300 vehicle trips per day, but that may be a conservative estimate when considering the support services such a facility generates i.e., food deliveries (Sysco), medical supplies, medical equipment, pharmacy, garbage trucks, other sanitation services, landscape trucks and workers, miscellaneous tradesmen i.e., plumbers, electricians, etc., add to these the employees covering three shifts, and the residents of the casitas, not to mention their family members and friends. Lastly, what about emergency services called out quite often to facilities such as these; all of them traveling up and down a VERY STEEP access road at all hours of the day and night. Many of these vehicles will be "gearing down" a procedure accompanied by very much noise. Traffic in and out of the proposed commercial facility (RVLP) would be: CONSTANT, NOISY AND DANGEROUS.

Granting approval for this commercial development through our quiet residential community would be incongruent with the original intention of the Las Palmas Specific Plan. When it comes to mitigating traffic safety, quite frankly, there is no way to accomplish this.
Thank you in advance for your time and consideration in this important decision. I respectfully request that the application for Riverview at Las Palmas PLN#150372 be denied and the land reserved for residential development in alignment with the Las Palmas General Plan. 45.5

Sincerely,

Janet Barstad

Janet Barstad, resident
17560 River Run Road
Salinas, CA 93908

Letter 45

COMMENTER: Janet Barstad

DATE: April 5, 2018

Response 45.1

The commenter provides background information and states that they are concerned about the project.

The commenter's individual concerns are addressed below.

Response 45.2

The commenter states that the project should not impact cost or quality of wastewater treatment for Subdivision residents.

An impact to the quality of wastewater service for Subdivision residents is not anticipated, as stated in Section 11.12, *Wastewater*, of the Draft SEIR. The pricing of wastewater service for residences is not an environmental impact and is outside of the scope of the Draft SEIR.

Response 45.3

The commenter expresses concerns about project impacts on traffic at the entrance to the Subdivision and safety in the Subdivision.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. Topical Response D discusses traffic conditions on residential streets. As noted therein, the project would have a less than significant impact on traffic conditions in the Subdivision, and no mitigation would be required. Topical Response A describes the implementation of advanced notices of visitors to security staff, the issuance of parking permits or identification for staff at the assisted living facility, and continued screening by security staff of all visitors who queue at the security gate. Topical Response A also clarifies Section 11.9, *Public Services*, of the Draft SEIR, and explains that the project would participate proportionately in the cost of the Subdivision's security service.

Response 45.4

The commenter describes concerns about vehicle trips through the Subdivision causing impacts on traffic, noise, and safety.

Please refer to Topical Response A, Topical Response D, and Topical Response H. Topical Response A describes the implementation of advanced notices of visitors to security staff, the issuance of parking permits or identification for staff at the assisted living facility, and continued screening by security staff of all visitors who queue at the security gate. Topical Response D discusses traffic conditions on residential streets. As noted therein, the project would have a less than significant impact on traffic conditions in the Subdivision, and no mitigation would be required. Topical Response H addresses operational noise impacts of the proposed project. As noted therein, the project would have a less than significant impact on long-term noise levels.

Response 45.5

The commenter states that the project is incompatible with the site's intended land use, and that traffic safety impacts cannot be mitigated.

Please refer to Topical Response D. As described therein, the project would not result in a significant impact related to traffic safety. Please refer to Topical Response C for a discussion of the site's zoning and compliance with applicable planning documents. As described therein, the project would be consistent with the site's zoning and land use requirements.

April 5, 2018

Letter 46

RECEIVED
APR 16 2018
Monterey County RMA

Joseph Sidor, Associate Planner Monterey County
RMA-Planning Second Floor
1441 Schilling Place
Salinas, CA 93901

RE: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr. Sidor,

As a resident and home owner in Las Palmas I, I am very opposed to the proposed project. The proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, is inconsistent with the residential atmosphere that I chose as a Las Palmas resident when I located here in the first place. I would like you to consider how you would feel if this were in your neighborhood. I would understand housing, but a full blown business with close to 100 employees is certainly not what the land is zoned for. Had I known prior to buying my home, I would certainly have considered a different neighborhood. I strongly urge the developer to find alternate venue and access for his proposed facility. Please respond to the issues I listed above in writing. 46.1

Respectfully,

Sue McFeron
21139 Old Ranch Ct.
Salinas, CA 93908

Cc: Brandon Swanson, Planning Manager swansonb@co.monterey.ca.us
Roy Gobets 21056 Country Park Road, Salinas, CA, 93908, roygobets@aol.com

Letter 46

COMMENTER: Sue McFeron

DATE: April 5, 2018

Response 46.1

The commenter states that they are opposed to the project, and lists concerns related to traffic, safety, and land use incompatibility.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response C. As described therein, the project would be consistent with the site's zoning and land use requirements.

21140 Country Park Road
Salinas, CA 93908
April 5, 2018

Letter 47

Mr. Joseph Sidor, Associate Planner
Monterey County RMA-Planning
1441 Schilling Place, Second Floor
Salinas, CA 93901

RE: River View at Las Palmas Assisted Living Senior Facility
(Plan #150372; SCH #2017031025)

Dear Mr. Sidor:

I'm writing to you as a highly concerned homeowner living for many years at Las Palmas Ranch, Phase 1.

Through different correspondence/meetings my wife and I were informed of the proposed building of an Assisted Living Senior Facility on top of the hill behind our home, off of River Road accessing it through the Las Palmas development. It was stated that the proposed project will consists of a three-story-high main building (on top of the hill and will be highly visible from the surrounding areas as well as Spreckels), with multiple smaller buildings and nearly 100 parking lots. My main concern is that we live in a canyon with only one way out. 47.1

FIRE: In case of a devastating fire, how would all the Las Palmas residents escape with many families having three and even four vehicles? Who would have priority in an evacuation situation? Would there be enough water/water pressure for the fire department to extinguish a large fire for the residents' homes, the proposed assisted living facility on top of the hill and adjacent hills and canyon areas?

NOISE: Since we live in a canyon, the echo effect is huge. The noise factor for building this site would be atrocious. Currently, lawn mowers and home improvement projects for example, echo quite a lot and at times it is dreadful. Depending on the direction of the wind, we can hear the trains and whistles from the Salinas train station in town and can also hear the traffic noise and sirens from River Road and Highway 68, as well as the crop dusters and Ag equipment in the fields. 47.2

POLLUTION: Not only will the noise factor be detrimental to the residents who already live here, but also the pollution this kind of construction will produce such as earth movements, tree removal, construction vehicles pollution, construction itself and the **dust** and **dirt** in the air that will blow/deposit into our living area, and which we also have to breathe. We have residents who have respiratory problems, allergies, etc. And who will pay for extra medical care? 47.3

ROAD DAMAGE: Who will be responsible for all the road damage that will be incurred? The homeowners have paid for many years a monthly ($150) HOA fee for upkeep of roads, green areas, etc. 47.4

SAFETY: Safety is also a tremendous factor. Many residents walk or jog on a daily basis on the streets or in the back of the homes and cross the road onto Woodridge Court near the Corey House. Lately, more families with small children have moved to the neighborhood which causes great concern as kids play and cross the roads to the park area in front of the Corey House. 47.5

Even though we have a gate guard during the day, we're concerned about the safety of the Las Palmas area especially during evening hours and throughout the night. Even more strangers will wander and drive with excessive speed throughout our residential neighborhood, and some with unlawful intentions.

TRAFFIC: With this proposed development, there will be much more traffic such as delivery vehicles, staff, housekeeping personnel and business vehicles, nursing home residents and their visitors' vehicles, as well as emergency vehicles. We would not appreciate waiting in a long line of traffic out on River Road trying to get home. This is an unreasonable demand on the residents who already live here. 47.6

We strongly request that the Monterey County Planning Commission disapprove the building of an Assisted Living Senior Facility on top of the hill above Las Palmas Ranch Phase I, a business/ medical facility with 142 beds, larger than some hospitals, in a single home residential community. 47.7

Years ago, we had to oppose the building of a Cogeneration Plant in Spreckels. Now this development. We would like to continue to live in a quiet and peaceful community. Thank you for your consideration.

Sincerely,

C Ruddell

Mr. and Mrs. Clarence Ruddell
Home Owners

Letter 47

COMMENTER: Mr. and Mrs. Clarence Ruddell

DATE: April 5, 2018

Response 47.1

The commenter describes concerns related to fire safety and emergency access/evacuation.

Please refer to Topical Response B. As noted therein, Section 11.9, *Public Services*, of the Draft SEIR has been revised to note that the project has been reviewed by the MCRFD, which determined that a fire flow rate of 1,500 gallons per minute at a pressure of 20 pounds per square inch for a duration of up to three hours would be sufficient for the project. The project would be required to implement all design recommendations provided by the MCRFD to ensure project compliance with the Fire District's regulations and reduce fire hazards on the project site, as noted in Topical Response B.

The discussion pertaining to emergency access/evacuation is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. For additional detail refer to Topical Response B.

Response 47.2

The commenter describes concerns about noise impacts, particularly with regard to the potential for noise from the project to echo within the Subdivision.

Please refer to Topical Response H, which includes a detailed evaluation of the operational noise impacts of the project, including baseline sound level measurements conducted in and around the Subdivision. As described therein, operational noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 47.3

The commenter describes concerns related to air pollution during project construction, including dust.

Suspended particulate matter emissions (including airborne dust during construction) are discussed in Section 6.0, *Air Quality*, of the Draft SEIR. As described therein, construction of the project would expose nearby residences to particulate matter emissions from the use of off-road equipment as well as large diesel-fueled trucks. Mitigation Measures AQ-1, AQ-2, and AQ-3 are required to reduce this impact to a less than significant level. These three measures require, respectively, the inclusion of dust control measures in the project's grading plan, appointment of a site monitor, and maintenance of equipment for low emissions. For a full description of particulate matter emissions and mitigation measures, refer to Section 6.0, *Air Quality*, of the Draft SEIR.

Response 47.4

The commenter asks who will be responsible for road damage caused by the project.

Please refer to Topical Response D. As discussed therein (Deterioration of Residential Streets) the Draft SEIR has been amended to discuss the potential for vehicle trips generated by the project to deteriorate residential streets in the Subdivision.

Response 47.5

The commenter states that the project threatens the safety of residents, including children, that use the Subdivision streets.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. Topical Response A describes the implementation of advanced notices of visitors to security staff, the issuance of parking permits or identification for staff at the assisted living facility, and continued screening by security staff of all visitors who queue at the security gate. Topical Response D discusses traffic conditions on residential streets, which would continue operating within acceptable traffic volumes with the addition of project trips. Additionally, the project would have a less than significant impact on traffic safety.

Response 47.6

The commenter states that the project would increase traffic, including at the Subdivision's entrance.

Please refer to Topical Response D. As noted therein, the project would have a less than significant impact on traffic conditions in the Subdivision, and no mitigation would be required.

Response 47.7

The commenter requests that the Monterey County Planning Commission disapprove the project, as it is a senior facility in a residential community.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

The project is a senior assisted living facility. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. For more detail, please refer to Topical Response C.

Letter 48

Received by RMA-Planning
on April 5, 2018.

Sidor, Joe (Joseph) x5262

From: Gayle Todd <gayletodd@gmail.com>
Sent: Thursday, April 5, 2018 11:56 AM
To: Sidor, Joe (Joseph) x5262; Swanson, Brandon xx5334
Subject: RVPL Draft SEIR for Proposed Development of Riverview at Las Palmas (PLN 150372)

Robert Scranton17641 River Run RdSalinas CA 93908831.455.7857 April 7, 2018 Mr. Carl Holm, Planning Director, Mr. Joseph Sidor, Associate Planner, Mr. Brandon Swanson, Planning Manager, Monterey County RMA-Planning Second Floor 1441 Schilling Place, Salinas, CA 93901 (831) 755-5262 Gentlemen: I am resident of Las Palmas and strongly opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372). This community was chosen by the residents as a quiet, safe and relatively dark haven from the Salinas proper area. This large non-residential development is inconsistent with the Las Palmas community core values. **I. Traffic:** • River Road Traffic: The stop light at LP1 entrance has seen 20 accidents over the last 10 years. One 4-year old child has already died by a texting drunk-driver. I personally observed one accident. Additional traffic for the “Parcel Q” will aggravate this situation. • Potential Accidents: Currently, the curve blocking the visual to the LP1 light going South, allows only 4-5 seconds (traveling at 55 mph) before reaching the intersection. This short distance is suspected as the cause of several accidents at this point. If the proposal goes through, any celebrations with family members over holidays and family events at “Parcel Q” will significantly increase the traffic load and potential for blood shed. • Security Stops: Traffic already backs up into the River Road exit lane at peak times due to our security check point. Adding 50-90 cars and construction vehicles a day will increase the potential for further traffic congestion and accidents. • Emergency Situations: God forbid, the potential for a conflagration erupting on the south end of the canyon would necessitate immediate evacuation of all members of the community. A NW wind driven fire could spread exponentially in these closely packed houses as seen in recent fires in northern and southern California. There are 2 exits to get out for over 300+ homes plus the emergency vehicles, potential staff and patients! • Construction Traffic: The traffic generated by the construction phase will be extremely problematic. This quiet valley is nestled between two large hill sides. Any construction traffic noise would be echoed off the hills. Construction and delivery equipment would need to climb a steer entrance road at low gear. Any subsequent grading equipment will emit a loud back up beeping noise that will be heard from all LP1 units. This constant and increased traffic would irrevocably alter the safe, peaceful nature of the community. • Commercial Traffic: The proposed development would bring increased emergency fire and ambulance calls as both are required to attend. These will bring unwanted noise and light pollution at all hours of day and night. Any commercial vehicles -- food deliveries, medical waste, trash, linen, etc., -- and potentially 90+ employee vehicles will funnel through a narrow street originally designed for residential traffic. **II. Security** • Security of the neighborhood would be compromised by this unwarranted, greedy assault on LP1 community. As this will open the neighborhood to non-residential traffic, we fear an increase in crime that has decreased since installation of LP1 security personnel. There is no way to regulate this increased traffic and guarantee the security of the neighborhood. This is a real concern. **III. The Proposed Non-Residential Development is Inconsistent with the Existing Residential Community** • Under The Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood. • This parcel is zoned "medium density residential," at 2.61 units per acre. ***Under the Las Palmas Plan this parcel was specifically approved for 8 units total.*** The developer now seeks a "conditional use permit" to allow development of a non-residential facility with a total of 105 units. This is inconsistent with The Las Palmas and Monterey County Plans. • The developer seeks to circumvent these plans by requesting an amendment for a non-residential use. Specifically, the developer asks you approve an amendment with the following language; “Assisted living facilities are not considered residential units (and should not be) subject to the residential limitation of the (Las Palmas) Plan.” **An assisted living facility is not a residential use, because it does not operate or function in a manner like independent residential units.** • Las Palmas is a highly desirable residential community with stable property values. Residents fear the loss of their investment potential from a rush to get out of LP1 due to the nature of this development. Several friends have moved out fearing this project. • To approve this amendment to the Las Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community. **IV Intrinsic Values: Development of this size will alter our environment.** • The location in question has 80+ eucalyptus trees that will be removed under current plan. These provide reduction in wind, ridgeline exposure and Hwy 68/RR sound abatement. • Moreover, these 70+ year old eucalyptus trees are home to several generations of Red Tailed Hawks and Great Horned Owls. Last year we had an overabundance of Vols (large field mice) which were running around even in daylight. These essential predators were active in Vol reductions. Watching these great birds soar and perform aerial ballets over our hillsides

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48.7

is unmatched in Salinas proper. • Bobcats and deer live up on the hillsides and flats of the area in question. Last year one female bobcat brought her 3 cubs out into our common area multiple times. This was a delight of all who caught this rare event. One mother deer has birthed 5-6 pairs of babies over the last few years and we have watched them grow into adulthood. • Destabilization of the steep hillsides in question is a serious threat to mudslides. We have experienced similar abundant rain-slide events even without any development activity. • ***Would you want this development to go forward next door to your home?*** • Light Pollution: We currently are able to view changing of the planets and star constellations due to our unpolluted dark areas. This will stop under the PLN#1500372. • Noise: A friend who worked to help develop a similar nursing home in Hollister indicated the potential of “Screamers” being heard in the night is real. She later regretted helping this proposal from just this perspective. • Smells: As this proposed facility will generate substantial numbers of meals, we will not enjoy sharing their menus due to prevailing winds. I request you please carefully evaluate these issues when considering this proposed development. Thank you for your consideration, Sincerely, Robert ScrantonApril 7, 2018

48.8

48.9

Letter 48

COMMENTER: Robert Scranton

DATE: April 5, 2018

Response 48.1

The commenter states that the project is inconsistent with the surrounding residential land use.

The project is a senior assisted living facility. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. For more detail, please refer to Topical Response C.

Response 48.2

The commenter states that there is a history of traffic accidents at the Subdivision entrance, and that the project would increase safety risks.

Please refer to Topical Response D. As stated therein, traffic volumes on Subdivision streets would remain at acceptable levels during operation of the project, and project-generated traffic would not result in substantial queuing at the entry gate. Therefore**,** traffic at the entry gate would not increase to the extent that traffic safety would substantially deteriorate.

Response 48.3

The commenter states that the project would make emergency evacuations in the area more difficult.

Please refer to Topical Response B. As noted therein, Section 11.9, *Public Services*, of the Draft SEIR has been revised to note that the project has been reviewed by the MCRFD, which determined that a fire flow rate of 1,500 gallons per minute at a pressure of 20 pounds per square inch for a duration of up to three hours would be sufficient for the project. The project would be required to implement all design recommendations provided by the MCRFD to ensure project compliance with the Fire District's regulations and reduce fire hazards on the project site, as noted in Topical Response B.

The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. For additional detail pertaining to emergency access, refer to Topical Response D.

Response 48.4

The commenter states that the project would cause construction and operational noise and light pollution impacts.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is required to reduce lighting impacts to a less than significant level. Please refer to Topical Response H, which includes a detailed discussion of the

project's construction and operational noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 48.5

The commenter states that the project would compromise security in the Subdivision.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision. Regarding the Subdivision's private security service, refer to Topical Response I, which discusses the project applicant's responsibility to share in the LPHOA's security costs.

Response 48.6

The commenter states that the project is not an appropriate land use for the project site and is inconsistent with Las Palmas and Monterey County Plans.

The project is a senior assisted living facility. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. For more detail, please refer to Topical Response C.

Response 48.7

The commenter describes local wildlife and states that the project could impact.

Regarding impacts to wildlife, please refer to Topical Response G. As stated therein, impacts to wildlife would be mitigated to less than significant by preconstruction surveys and avoidance.

Response 48.8

The commenter states that the problem would cause nighttime light pollution and noise impacts.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is required to reduce lighting impacts to a less than significant level. Please refer to Topical Response H, which includes a detailed discussion of the project's long-term noise impacts. As described therein, long-term noise impacts would be less than significant or less than significant with mitigation incorporated. For a discussion of the potential for screaming behavior associated with people at the proposed senior living community, refer to Response 32.12.

Response 48.9

The commenter discusses odor impacts from meals.

Odor is discussed in Section 6.0, *Air Quality,* of the Draft SEIR, and again in Topical Response C. Odors released outdoors from meal preparation would be intermittent and unlikely to be objectionable to the extent of causing a public nuisance.

Letter 49

Received by RMA-Planning
on April 5, 2018.

Sidor, Joe (Joseph) x5262

From: Gayle Todd <gayletodd@gmail.com>
Sent: Thursday, April 5, 2018 11:53 AM
To: Sidor, Joe (Joseph) x5262; Swanson, Brandon xx5334
Subject: RVPL Draft SEIR for Proposed Development of Riverview at Las Palmas (PLN 150372)

Gayle Todd17641 River Run RdSalinas CA 93908831.596.6772 April 7, 2018 Mr. Carl Holm, Planning Director, Mr. Joseph Sidor, Associate Planner, Mr. Brandon Swanson, Planning Manager, Monterey County RMA-Planning Second Floor 1441 Schilling Place, Salinas, CA 93901 (831) 755-5262 Gentlemen: I am resident of Las Palmas and strongly opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372). This community was chosen by the residents as a quiet, safe and relatively dark haven from the Salinas proper area. This large non-residential development is inconsistent with the Las Palmas community core values. **I. Traffic:** • River Road Traffic: The stop light at LP1 entrance has seen 20 accidents over the last 10 years. One 4-year old child has already died by a texting drunk-driver. I personally observed one accident. Additional traffic for the “Parcel Q” will aggravate this situation. • Potential Accidents: Currently, the curve blocking the visual to the LP1 light going South, allows only 4-5 seconds (traveling at 55 mph) before reaching the intersection. This short distance is suspected as the cause of several accidents at this point. If the proposal goes through, any celebrations with family members over holidays and family events at “Parcel Q” will significantly increase the traffic load and potential for blood shed. • Security Stops: Traffic already backs up into the River Road exit lane at peak times due to our security check point. Adding 50-90 cars and construction vehicles a day will increase the potential for further traffic congestion and accidents. • Emergency Situations: God forbid, the potential for a conflagration erupting on the south end of the canyon would necessitate immediate evacuation of all members of the community. A NW wind driven fire could spread exponentially in these closely packed houses as seen in recent fires in northern and southern California. There are 2 exits to get out for over 300+ homes plus the emergency vehicles, potential staff and patients! • Construction Traffic: The traffic generated by the construction phase will be extremely problematic. This quiet valley is nestled between two large hill sides. Any construction traffic noise would be echoed off the hills. Construction and delivery equipment would need to climb a steer entrance road at low gear. Any subsequent grading equipment will emit a loud back up beeping noise that will be heard from all LP1 units. This constant and increased traffic would irrevocably alter the safe, peaceful nature of the community. • Commercial Traffic: The proposed development would bring increased emergency fire and ambulance calls as both are required to attend. These will bring unwanted noise and light pollution at all hours of day and night. Any commercial vehicles -- food deliveries, medical waste, trash, linen, etc., -- and potentially 90+ employee vehicles will funnel through a narrow street originally designed for residential traffic. **II. Security** • Security of the neighborhood would be compromised by this unwarranted, greedy assault on LP1 community. As this will open the neighborhood to non-residential traffic, we fear an increase in crime that has decreased since installation of LP1 security personnel. There is no way to regulate this increased traffic and guarantee the security of the neighborhood. This is a real concern. **III. The Proposed Non-Residential Development is Inconsistent with the Existing Residential Community** • Under The Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood. • This parcel is zoned "medium density residential," at 2.61 units per acre. ***Under the Las Palmas Plan this parcel was specifically approved for 8 units total.*** The developer now seeks a "conditional use permit" to allow development of a non-residential facility with a total of 105 units. This is inconsistent with The Las Palmas and Monterey County Plans. • The developer seeks to circumvent these plans by requesting an amendment for a non-residential use. Specifically, the developer asks you approve an amendment with the following language; “Assisted living facilities are not considered residential units (and should not be) subject to the residential limitation of the (Las Palmas) Plan.” **An assisted living facility is not a residential use, because it does not operate or function in a manner like independent residential units.** • Las Palmas is a highly desirable residential community with stable property values. Residents fear the loss of their investment potential from a rush to get out of LP1 due to the nature of this development. Several friends have moved out fearing this project. • To approve this amendment to the Las

Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community. **IV Intrinsic Values: Development of this size will alter our environment.** • The location in question has 80+ eucalyptus trees that will be removed under current plan. These provide reduction in wind, ridgeline exposure and Hwy 68/RR sound abatement. • Moreover, these 70+ year old eucalyptus trees are home to several generations of Red Tailed Hawks and Great Horned Owls. Last year we had an overabundance of Vols (large field mice) which were running around even in daylight. These essential predators were active in Vol reductions. Watching these great birds soar and perform aerial ballets over our hillsides is unmatched in Salinas proper. • Bobcats and deer live up on the hillsides and flats of the area in question. Last year one female bobcat brought her 3 cubs out into our common area multiple times. This was a delight of all who caught this rare event. One mother deer has birthed 5-6 pairs of babies over the last few years and we have watched them grow into adulthood. • Destabilization of the steep hillsides in question is a serious threat to mudslides. We have experienced similar abundant rain-slide events even without any development activity. • ***Would you want this development to go forward next door to your home?*** • Light Pollution: We currently are able to view changing of the planets and star constellations due to our unpolluted dark areas. This will stop under the PLN#1500372. • Noise: A friend who worked to help develop a similar nursing home in Hollister indicated the potential of “Screamers” being heard in the night is real. She later regretted helping this proposal from just this perspective. • Smells: As this proposed facility will generate substantial numbers of meals, we will not enjoy sharing their menus due to prevailing winds. I request you please carefully evaluate these issues when considering this proposed development. Thank you for your consideration, Sincerely, Gayle ToddApril 7, 2018

Letter 49

COMMENTER: Gayle Todd

DATE: April 5, 2018

Response 49.1

The content of this letter is the same as the content of Letter 48. Please refer to Responses 48.1 through 48.9 above.

Mr. Sidor, Associate Planner
Mr. Brandon Swanson, Planning Manager
Monterey Country Planning Commission

Letter 50

RECEIVED
APR 06 2018
Monterey County RMA

Dear Mr. Sidor and Swanson

As a homeowner in Las Palmas 1, I am voicing my concerns in regard to the proposed development of PLN#150372 known as Riverview at Las Palmas.

- Zoning
  - A. As a non-residential commercial facility, the zoning does not support the use proposed. The request for a "Conditional Use Permit" undermines the very reason that residents bought in LP1 with the assurance of a peaceful residential neighborhood free from commercial activity. 50.1
  - B. The clear cutting of the eucalyptus on the ridge where the development is proposed will expose all the buildings to the homes to the south and also from hi-way 68, River Road and Spreckels Blvd. A three story building on the ridgeline is an absolute contradiction in regards to the scope of the original Las Palmas Specific Plan which was to blend with the pastoral beauty of the area. 50.2
  - C. As in any real estate transaction "location" is the primary consideration. The Residents of LP1 took this into consideration when purchasing their homes insuring a quiet, safe residential area to raise their families. The addition of a commercial entity brings with it more traffic and activity that will affect the desirability of the area and impact property values. 50.3
- Traffic
  - A. Numerous homes front the roadway leading to the proposed development turning the residential street into a main artery of travel by workers, family, visitors, commercial and emergency vehicles.
  - B. Deceleration lanes on River Road will be backed up while security tries to screen all vehicles coming into the entrance. 50.4
  - C. Security currently provided by the residents of LP1 and funded through the Home Owners Association, would have difficulty screening the amount of vehicles through the entrance and without their great work we will find ourselves back into the days of home intrusions and burglary.
  - D. In the event of wildfire, evacuating the proposed facility would be extremely difficult with the flames naturally moving uphill and only one exit road that would be plugged with traffic from the lower level homes.
- Water
  - A. How can the County continue to approve projects while the Valley has been in the state of overdraft of the water aquifer for years? 50.5

The proposed Non Residential Development does not meet the "Las Palmas Specific Plan" or the "Monterey County Plan". The developers of Las Palmas Subdivision were required to meet all the requirements ensuring that the area would maintain the character of its rural setting. Approval of the proposed project would overlook all the requirements required of the original subdivision and take an area zoned for several houses and turn it into a commercial venture incompatible with the current use. If we had the detailed information that is available now we would have probably not purchased our home here. I urge you to consider all the issues and decline this application. 50.6

Regards

John and Nori Bridges

Please respond in writing to:

17588 River Run Rd. Salinas 93908

Letter 50

COMMENTER: John and Nori Bridges

DATE: April 5, 2018

Response 50.1

The commenter states that the project does not fit with the site's zoning and is incompatible with surrounding land use.

The project is a senior assisted living facility. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. For more detail, please refer to Topical Response C.

Response 50.2

The commenter states that the project would not be consistent with the LPRSP in terms of management of the area's aesthetics.

Please refer to Topical Response C regarding consistency with LPRSP policies. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 50.3

The commenter states that the project's traffic and operational activity would reduce neighboring home values.

Please refer to Topical Response C. As described therein, property value is not an environmental impact and therefore is not analyzed in the Draft SEIR. The Draft SEIR does include analysis of traffic and noise impacts. All impacts were determined to be less than significant or less than significant with mitigation incorporated, with the exception of traffic impacts to SR 68, which would be significant and unavoidable. For a discussion of traffic, refer to Topical Response D, and for a discussion of noise, refer to Topical Response H.

Response 50.4

The commenter describes traffic impacts of the project, including impacts related to queueing, security, and emergency evacuation.

Please refer to Topical Response D for a discussion of queuing concerns at the Subdivision's entry gate. As noted therein, the project would increase inbound traffic at the gate by an estimated 16 percent. However, this increase in traffic would not substantially increase queuing. An additional westbound entrance lane at the gate would not be needed, and queuing vehicles would not obstruct vehicles from turning left onto Winding Creek Road. Therefore, the project would have a less than significant impact on traffic circulation related to queuing.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. Topical Response A describes the implementation of advanced notices of visitors to security staff, the issuance of parking permits or identification for staff at the assisted living facility, and continued screening by security staff of all visitors who queue at the security gate. Topical Response D discusses traffic conditions on residential streets, which would continue

operating within acceptable traffic volumes with the addition of project trips. The discussion pertaining to traffic, on-site circulation, and emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR.

Response 50.5

The commenter asks how the County can approve projects while the water aquifer is in a state of overdraft.

Please refer to Responses 3.1, 3.2, and 3.3 above.

Response 50.6

The commenter states that the project is inconsistent with surrounding land uses, and would be a commercial project on a site zoned for residential development.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Letter 51

Received by RMA-Planning
on April 6, 2018.

Sidor, Joe (Joseph) x5262

From: roygobets@aol.com
Sent: Friday, April 6, 2018 8:31 AM
To: Sidor, Joe (Joseph) x5262
Cc: Onciano, Jacqueline x5193; Swanson, Brandon xx5334; Holm, Carl P. x5103
Subject: Comments on DSEIR for RVLP Project (PLN150372)
Attachments: RVLP DSEIR Comments April 6, 2018.docx

Hello Joe,

Attached in the Word document are my extended comments to the referenced DSEIR.

You should be receiving a substantial number of Public Comment letters from our LPI neighbors. Please expect a strong and energized attendance from local homeowners at the eventual Planning Commission meeting(s).

May I please briefly meet with you at Schilling during the week of 4/9? I will provide you with some additional documents that directly bear on this DSEIR.

I look forward to your written response to the concerns expressed in the attached report.

Please confirm receipt of this e-mail.

Regards,

Roy Gobets

COMMENTS on DSEIR for RIVER VIEW at LAS PALMAS ASSISTED LIVING SENIOR CENTER FACILITY (PLN150372; SCH 2017031025)

Below is a list of selected CEQA questions by category that I found useful and relevant in commenting on the subject DSEIR. I answered these CEQA questions, and where possible, referenced the relevant claims/impacts/mitigations in the DSEIR. There are four additional important non-CEQA (Project) areas identified at the end of this report. 51.1

Summary: The Applicant owns Parcel Q and has every right to put it to a conforming use for his benefit. Senior care and housing are increasingly vital needs with our aging society. While I am not familiar with statistics on Monterey County senior care facility and housing needs versus capacity, I can well imagine that there might be pressing needs to build additional capacity. I assume the Application knows these needs.

That said, siting, constructing and operating the proposed RVLP facility as outlined in the DSEIR is a mistake. It is the wrong project in the wrong location. In the following analysis, I cite relevant CEQA questions and provide a response as seen from my perspective as a longtime Las Palmas I homeowner and stakeholder in this vibrant residential community.

In my view, for the reasons cited in this report, RVLP should be denied.

The Applicant should alternatively consider building three high-end homes on the parcel. This will fully build out the allowed number (1031) of housing units under the Las Palmas Specific Plan, and provide an opportunity to realize a return on his property.

CEQA QUESTIONS CONSIDERED.

I. AESTHETICS (Reference AES-1, 2, 4) -- Would the project:

a) Have a substantial adverse effect on a scenic vista? 51.2

> Yes – State Highway 68 from State Highway 1 in Monterey to the Salinas River is a State Scenic roadway, and both River Road and Spreckels Boulevard are County Scenic roadways. All three roads are designated as Tourism Access Hiways. This proposed development is clearly in the view shed of these Tourism Access Hiways.
>
> The large buildings (two and three floors) cannot realistically be hidden from view by new bushes or tree landscaping. In all three cases (Hiway 68, River Road and Spreckels Boulevard) the development would be clearly visible and clash with the pastoral view. (Ridgeline – LPSP)

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Yes, The DSEIR requests the removal of 80 mature Eucalyptus trees. If permitted, this will indelibly scar LPI scenic beauty and have profoundly negative effects on soil stability, wind shielding and noise propagation (The latter three concerns are covered elsewhere in this report)

(Eucalyptus trees are not native to California. These stands of trees were purposely planted as windbreak in the late 1800's by early Monterey County settlers.

AES-1: *"The applicant shall prepare and submit a landscape plan to enhance screening from State Route 68, River Road, Reservation Road, and the adjacent neighborhood and trail"*

This statement is troubling, and the conclusion drawn that if this mitigation is completed the residual impact is "less than significant" is unwarranted. What does "enhance screening" mean once you have torn 80 mature Eucalyptus trees out?

Simply stated, there is no practical and effective mitigation measure to mask this proposed defacing of the hillside. RVLP is a clear violation of the Ridgeline policy in the LPSP. The assertion by the Applicant that planting new vegetation can effectively compensate for removing 80 mature Eucalyptus trees is a disingenuous attempt to deceive local residents – if so removed it will clearly take a human lifespan to restore the disrupted landscape to anything resembling its current pastoral character. Why pretend otherwise?

Further, the Hiram Corey House (National Register of Historic Places) is within Las Palmas 1, is adjacent to, and directly overlooked by the proposed development. This will negatively affect its setting. Governing Authorities are on record of effectively protecting the regionally important Tourist Industry and associated Historic buildings.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Yes. The proposed site presently is pristine wilderness. Las Palmas I is an abutting residential neighborhood, carefully sited in 1989 under the Las Palmas Specific Plan (LPSP) to blend with the pastoral beauty of the area. The scale and scope of the proposed institutional facilities would sharply clash with this setting.

51.3

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Yes. Despite proposed lighting scheme and visual mitigation measures by the developer, the removal of the Eucalyptus groves, coupled with the location of multiple story facilities on an exposed elevated knoll would be clearly be visible both during the day and at night.

III. AIR QUALITY (Reference AQ1-4) -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

51.4

a) Conflict with or obstruct implementation of the applicable air quality plan?

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

TBD. Local, current and accurate data are required to determine this. The closest particulate monitoring station is 6 miles southwest of the project site at Laurel and Constitution measuring an urban environment. We need accurate measurements locally to characterize conditions. This area is quite windy (trees are permanently bent as they grow) and excessive particulate matter from the adjacent fields such as pesticides, fertilizer and allergens are likely to adversely affect the intended facility's vulnerable senior population. Need input here from Public Health Agency.

The Fort Ord Recreational area directly to the north of this proposed building site is periodically cleared of ordinance by burning off the cover brush. This raises the smoke level and public warnings are published and broadcast by the local media. This should definitely be a cause of great for concern for older residents with any breathing problems.

e) Create objectionable odors affecting a substantial number of people?

51.5

Yes. This is an institutional facility with a large number of people both residing there plus support staff, visitors, etc. Meals will be prepared and served on site. Winds are strong in LPI. Institutional cooking odors would waft across the adjacent Las Palmas I neighborhood, especially at the most adjacent homes. There are 329 families in Las Palmas I, with about half close enough to be affected. This is objectionable indeed.

VI. GEOLOGY AND SOILS -- Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

ii) Strong seismic ground shaking? 51.6

Yes. The recent (November 2017, about 22 miles east of Salinas and 14 miles northeast of the town of Gonzales) 4.2+ grade local earthquake rocked the area. The raised location of the proposed RVLP development includes heavy buildings and roads right above the LPI homes adding risk for serious seismic related failures. While not located on a fault line, earthquakes are common in this region. Hollister is 28 miles from Salinas. San Juan Bautista is 23 miles from Salinas.

iii) Exposure to seismic-related ground failure, including liquefaction?

TBD. In the Appendices is a report from Landset Engineers, INC. In their cover letter to the Applicant, the author, Mr. Papurello states that RVLP is feasible, but qualifies that recommendation with the following statement*:*

" It is recommended that an additional design level soil engineering investigation should be performed once the preliminary development plans have been completed and locations & types of structures, and anticipated load are known."

Until this work is completed and reviewed, the question above cannot be answered. Why is this recommended report not included in the DSEIR?

iv) Exposure to Landslides?

Yes. Las Palmas I has experienced landslides historically on its perimeter along the slopes below the proposed site. As recently as February 2017, there was a serious landslide (interestingly, this was referred to in the DSEIR as "minor") near Country Park Road in the 20100 to 21056 region. 51.7

I live 50 yards from this slide location. Several homes were nearly flooded and only emergency efforts by Monterey County Regional Fire Department personnel (aided by several neighbors including myself) averted serious home damage. I witnessed the consequences of the slide; mudflows blocked drainage of the adjacent culvert, in turn causing flooding. The perimeter path behind my home was inundated for 100 yards knee deep in storm water. I have the photos and videos for inspection.

This slide was recently repaired (Q4 2017) by the developer. Its location is not unique as slopes near the proposed building site are uniformly steep, some exceeding 45 degrees. We have experienced other slides and can expect more.

Please note that the recent slide occurred naturally. Imagine the consequences of construction on the elevated site with multiple pieces of heavy equipment, over conceivably 18 months of construction span, coupled with the eradication of 80 large Eucalyptus trees, and possibly coupled with severe rains. Why is this most probable scenario not analyzed in the DSEIR?

The original Las Palmas developer, Mike Fletcher, chose to build the 329 homes of LPI on the lower terrain. Clearly this was to avoid the difficulties and costs associated with the higher slopes on Parcel Q.

As an example of combating past slides, near Canyon Park, just off the perimeter road, one can see two concrete retaining walls installed early on in Las Palmas I. These were erected to mitigate "toe-outs" during winter storms.

IX. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any water quality standards or waste discharge requirements?

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? 51.8

Yes. See item (e) below.

e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Yes. The proposed facility will cover 190,000+ square feet (4.36 acres) with a cumulative combination of impermeable pavement, roads and buildings. We routinely encounter heavy seasonal rains. All that unabsorbed water will flow downhill along unstable slopes into Las Palmas I, unless diverted by some as yet undefined drainage system. We are not informed so far about assumptions about how this will be accomplished. The present storm water capacity of Las Palmas is quite limited and was easily overwhelmed in February 2017. See: Landslides above. Again, where is the report Mr. Papurello referred to?

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding because of the failure of a levee or dam?

Yes. See item (e) above.

j) Inundation by seiche, tsunami, or mudflow?

Yes. While seiche (standing wave) and tsunami are clearly remote risks, mudflow and hill slides are serious risk for the LPI community. The recent events in winter 2018 in Montecito, CA demonstrate what catastrophes can happen.

Yes. While actual flooding of the *elevated plateau* on the site is a most remote risk, residents in lower elevation Las Palmas I have been isolated on several occasions in recent past by floodwaters.

The DSEIR (11-6) states: "*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*"

This cavalier dismissal of flood risk is a denial of a very legitimate and serious risk from consideration.

Generally, the Salinas River has flooded surrounding regions a number of times. This is not some hypothetical extreme scenario. See the following link.

(http://www.co.monterey.ca.us/government/government-links/water-resources-agency/programs/floodplain-management/historical-flooding#wra)

Specifically, the easement under consideration by the Applicant to enter and exit RVLP traverses these Las Palmas I areas that have definitely been flooded. Flooding is always a risk for us in a severe winter rain and/or a breach in the levee at the Salinas River. The direct consequences of such flooding would be to isolate RVLP from any of its lines of supply and support. A senior care facility with a fragile population must not be built in such a vulnerable location as proposed with a single road in and out of Las Palmas I. The very idea is irresponsible to contemplate.

X. LAND USE AND PLANNING - Would the project:

a) Physically divide an established community?

Yes. RVLP is a proposed business inside a vibrant residential community.

51.9

Las Palmas I has parks and a basketball court for children and families to enjoy a safe lifestyle.

Much of the LPI community presently has no sidewalks on either or both sides of the residential streets. Automobile traffic has been subdued by way of strategically placed bollards, speed bumps and street signs. People walk their dogs throughout the neighborhood. Las Palmas I **was purposely designed to promote walking or biking**. Cars drive slowly and children play safely in the streets. The RVLP planned development will threaten these highly desirable features of our quality of life.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? 51.10

Yes. Multiple aspects of the Monterey County General Plan would be violated by this project, including (but not limited to):

• L.U.-1.4: Growth areas shall be designated only where an adequate level of services and facilities such as water, sewerage, fire and police protection, transportation, and schools exists or can be assured concurrent with growth and development

• L.U.-1.5: Land uses shall be designated to achieve compatibility with adjacent uses.

• L.U.-1.11: Development proposals shall be consistent with the General Plan Land Use Map designation of the subject property and the policies of this plan.

• LU-2.19 The County shall refer amendments to the General Plan and zoning changes that would result in the creation of new residential, industrial, or commercial areas to the nearest cities for review and comment.

• L.U.-2.23: Medium Density Residential (MDR): Medium Density Residential areas are appropriate for a range of residential uses (1-5 units/acre) and housing types, recreational, public and quasi public, and other uses that are incidental and subordinate to the residential use and character of the area. The extent of use of land for this designation shall be limited to building coverage of 35% of the subject property.

• OS-1.2: Development in designated visually sensitive areas shall be subordinate to the natural features of the area.

• OS-1.3: To preserve the County's scenic qualities, ridgeline development shall not be allowed.

• T-1.6: Existing legal lots of record located in the critical viewshed may transfer density from the acreage within the critical viewshed to other contiguous portions of land under the same ownership, provided the resulting development meets all other Toro Area and General Plan policies.

• T-3.1: Within areas designated as “visually sensitive” on the Toro Scenic Highway Corridors and Visual Sensitivity Map, landscaping or new development may be permitted if the development is located and designed (building design, exterior

lighting, and siting) in such a manner that will enhance the scenic value of the area.

This project clearly and demonstrably constitutes a direct violation of the Las Palmas Specific Plan. This Plan limits housing units are at 1031. Presently almost built out at 1028 units….This fact directly contradicts the following inaccurate statement in DSEIR 2.2:

"Growth Inducting Effects - The subject parcel is the last remaining undeveloped property in the Las Palmas Specific Plan with a residential land use designation. Since the remainder of the Las Palmas Specific Plan has been built-out since the 1990s, the proposed project would not be population-inducing and would be consistent with General Plan and zoning designations for the site. Therefore, the project would not have growth inducing effects."

51.11

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

(Reference Bio 1-5) Table 2.1 does not mention the California Tiger Salamander. A notarized statement is available from Susan Hurst (LPI homeowner) documenting her direct observation of this protected salamander on the property. On pp. 7-11 in the DSEIR it states: *"Not expected. No suitable habitat found on the site."* Clearly, this is not the case.

The site is home to a variety of Fauna. Red Tail Hawks, Barn Owls and Wild Turkeys will be displaced. So will Bobcats, Mountain Lions and Deer. How will "preconstruction surveys" mitigate these concerns to have "less than significant residual impacts?" (Bio1-5).

51.12

XII. NOISE -- Would the project result in?

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Yes. Due to the elevation of the proposed site commercial vehicles (UPS, FedEx, supplier trucking, USPS service, etc., etc.) arriving and leaving

51.13

24/7 will necessarily gear down as they ascend and descend with consequent mechanical and road noise. The topography of the hills in combination with the canyon below will amplify this objectionable road and mechanical noise. There are many shift workers among the LPI homeowners and their rest time will be adversely affected by this increase in noise.

Further, given the age and health of the RVLP population, the facilities once operating will require **routine** 911 responses by emergency units such as Fire department engines and ambulances. As a benchmark, similar facilities in Carmel require frequent 911 Fire engine responses. To quantify the likely frequency of these here is benchmark dispatch data from the responding Fire districts. These data are available for inspection:

Incident Report by Location & Final Type 1/1/2016 to 4/1/2018:

Pacific Meadows Carmel

Total Incidents are 366, or 2.23 days between incidents

Del Mesa Carmel

Total Incidents are 285; 2.88 days between incidents

Rounding off for simplicity, these statistics point to **three such 911 emergency responses per week.**

One must factor into this that often such first responders will be not just Fire units but will often be joined by ambulances, not to mention mortuary transport.

Clearly, this combination of responding traffic will be noisy and disruptive even if sirens are not used. The Applicant has stated in his presentations on the project that the use of sirens could be suspended once "near" RVLP. This is not an enforceable promise. Thus the impact will include the noise associated with the vehicles by themselves PLUS sirens. This combination is absolutely objectionable to LPI residents.

Yes. The elimination of 80 Eucalyptus trees and brush will reduce natural barriers to road noise from RVLP and adjacent River Road traffic with adverse effects for the local homeowners.

b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?

Yes. Additional development generated traffic will subject LPI residents adjacent to Country Park Road, Woodridge Court and River Run to excessive noise.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

Absolutely. Las Palmas I currently is a peaceful and tranquil neighborhood. Future ambient noise introduced by this proposed development will permanently disrupt our quiet and peaceful residential neighborhood.

The Memory care unit will house Alzheimer's patients. Experience from similar facilities includes screaming patients. Sound carries in the box canyon below RVLP. Ours is a residential community. Clearly, this is inappropriate siting for such a care facility.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Yes. During construction, the Woodridge Court/River Run easement will be used by heavy equipment over the span of its construction. (Projected span?) We have recently (Fall 2017) experienced slope repairs and the use of heavy equipment. This experience was extremely noisy and severely disruptive for the nearby residents. Conversations within homes nearby had to be at elevated volume and sleep patterns for many were disrupted for more than a week.

From the DSEIR, under Project Description, Grading:

"Development of the project will require approximately 60,000 cubic yards of cut, most of which will be compacted and used on site, and 34,500 cubic yards of fill".

A dump truck holds between 10 and 14 cubic yards. If one conservatively assumes the figure 14 cubic yards and that **all** of the cut will be compacted on site as stated, then preliminary calculations of trucking requirements to accommodate just the fill needs for installing the facilities and ring road approach 2500 truckloads that will be carried by the easement roads. Coming and going that is 5000 trips.

Assuming again that all the cut is compacted on site as stated – it still has to be transported from point A to point B on the site. That translates to 4300 truckloads requiring transfer on the site itself. That is 8600 trips. While not requiring the same use of the easement, this will still generate excessive reverberating noise.

Noise associated with by such high volume (combined cut and fill trips > 13,000) truck traffic would be most disruptive to the neighborhood. Moreover, Las Palmas

streets will be torn up, homes disturbed, and pending home sales depressed or cancelled.

XIV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 public services:

51.14

Unclear. Other than Public Health, I cannot find any other Agency inputs

We do not understand the impacts on resources for Fire Protection, Police Protection, Parks, Water Resources, Public Works, Caltrans, TAMC. These Agencies must weigh in to this DSEIR.

Why is there no Agency review evident in the DSEIR? Is this not a requirement PRIOR to Public Comment publication of the DSEIR?

XVI. TRANSPORTATION/TRAFFIC – (Reference TRA 1, 2 and CTRA -1)

Would the project:

a) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

51.15

Yes. Addressed by expert Traffic report from TJKM Traffic Consultants Report to be available by 4/24.

Also to be factored in the analysis is the current use of local LPI streets for pedestrian traffic. This factor cannot be addressed simply with LOS calculations.

b) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Yes. There is no consideration given in the DSEIR to any LPI internal streets. Additional incoming traffic will queue as it attempts to enter into Las Palmas Road because of security kiosk monitoring access. This in turn will fill up the deceleration lane on River Road that was not designed for commercial traffic load.

Exiting traffic will also queue at the signalized intersection (River Road and Las Palmas Road). We daily experience River Road traffic, travelling at freeway speeds, running that light.

The consequences of the additional RVLP traffic load is far higher probability of collision as at this intersection.

This is not some theoretical scenario. Both intersections – River Road at Las Palmas Road and River Road at Riverview Court experienced multiple traffic accidents, sadly including a fatality of a LPI homeowner's young child:

(Data supplied by CHP Officers Tillman and Burch, and local residents; both available for inspection)

River Road at Las Palmas Road - 20 collisions 1998- spring 2017

River Road at Riverview Court - 4 collisions 1998 – spring 2017

c) Result in inadequate emergency access?

Yes. There is only one narrow and steep road leading into and out of the RVLP site. From our viewpoint, placing the facility on the hill is like building a ship in a bottle – how do you get people out in an emergency? The lack of due consideration given in the DSEIR to these very real life threatening logistics is deeply troubling. Anticipated response times by police, ambulance and fire units should be reviewed. Consideration must be given to patterns of responses when **all three of these services respond simultaneously** within the confines of severely restricted surroundings. 51.16

In case of fire, flood or earthquake RVLP residents, workers, visitors and service personnel will have to evacuate down this narrow service road onto Woodridge Court and somehow merge with the existing 329 homeowner families scrambling to leave at the Las Palmas Road intersection.

This poses unacceptable risk to both RVLP patients, LPI residents and normal River Road traffic flows.

A similar situation just occurred in West Chester, Pennsylvania on November 17, 2017 with a facility of approximately the same size as contemplated for RVLP. While fire regulations are likely to be very different between PA and CA, the quote below should give one pause:

"At least 27 people were known to have been injured in a massive fire at the Barclay Friends Senior Living Community. Firefighters alone were unable to evacuate residents, many with mobility impairments".

(http://6abc.com/2659822/) Please view this link.

Let's not repeat such a fiasco.

XVII. UTILITIES AND SERVICE SYSTEMS -- Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? 51.17

Unclear. Present wastewater treatment facility near the Kinship Center, operated by Cal Am Water has experienced capacity and quality issues servicing just Las Palmas I and II. This needs further elaboration. County Agency inputs?

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Possibly. Need more information. Need County Agency comments.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Definitely. There are two storm drains on Woodridge Court and their joint capacity was not designed to evacuate the storm water load resulting from covering 190,000 square feet with impermeable materials. Need more information, again where is the Agency input?

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? 51.18

Yes. Water resources in Salinas Valley Zone 2C are in overdraft situation. California is still in a drought. This is not news…..RVLP will exacerbate this already critical problem.

What is the capacity of the existing wells and service area and what happens if the drought continues?

How is it possible for a “Can and will serve letter” to be issued under these conditions?

e) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?

Unknown. County Agency inputs?

f) Comply with federal, state, and local statutes and regulations related to solid waste?

TBD. County Agency inputs?

51.19

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE --

e) 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)?

Yes. Traffic is a known, dominant and troublesome issue on River Road and Hiway 68 in consequence of past decisions to approve developments along these corridors. Incremental traffic burden generated by the projected development will only exacerbate this situation. It defies logic and common sense to describe this inescapable fact and then term it a “significant impact that cannot be mitigated to an insignificant level”. If it cannot be mitigated then do not permit RVLP to worsen the situation.

b) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Yes. People bought their homes in Las Palmas I based in part on the tranquil traffic within the neighborhood. They will be subject to much greater traffic noise and danger of bodily injury than they expected and consequently suffer adverse effects. There are further adverse ramifications listed under the non-CEQA section below.

51.20

Non - CEQA QUESTIONS CONSIDERED.

The following headings contain critically important PROJECT related concerns that are not in the DSEIR. Their glaring absence from DSEIR consideration is deeply troubling.

51.21

Background:

Some context for these concerns is necessary before specific issues are listed.

In the late eighties Monterey County faced (and still does) the pressing need for more "affordable" housing. Given the desirability of the River Road corridor for locating such housing, the Board of Supervisors opted that this needed expansion should be planned and contained in a "master" development to prevent a more scattered, random and troublesome growth pattern.

These were the premises underlying the approval of the Las Palmas Ranch Specific Plan by the Board of Supervisors at the time. The project was (and is) a success. It is a highly desirable neighborhood for families of all ages.

Sales brochures from the eighties and nineties describe a pristine country setting, attractive housing and a relaxed neighborhood atmosphere where young families could safely raise their children and older homeowners could enjoy a stroll in the natural surroundings.

These were the reasons people bought their homes in Las Palmas I. These are the reasons we still live here now and love our neighborhood. These are the reasons we strongly object to this proposed development. It would shatter our peaceful and loved neighborhood.

1) **Fire Prevention (**Note-Why is this not a CEQA category?**)**

Fire danger is ever-present due to the extremely dry conditions posed by local climate between April and November. In the evening winds are considerable due to the topography of the slopes and valley. The River Road corridor functions much like a giant horizontal chimney. Thus channeled, strong winds can quickly propel a minor fire into a blaze.

The slopes are dry and brown during these months and it would not take much to start a grass or brush fire. A simple outdoor BBQ accident by a resident of the proposed casitas could easily trigger such a disaster. A casually tossed cigarette. A backfire. A lawnmower.

Construction on the site and slopes could lead to sparks and a similar event. Recent extreme fire experiences as witnessed during the Sobranes and Tubbs catastrophes point to inadequate emergency measures in evacuation standards.

The Sobranes fire showed it could happen here; the Tubbs fire shows how deadly it can be in a similar setting. It is impossible to overemphasize these concerns. It is irresponsible to downplay them…….

2) Security & Safety

By the early 2000's it became evident that there were issues with neighborhood safety and theft in LPI. Daytime break-ins became more frequent and in 2008, the Homeowner Association invested in an access security system that included a staffed guard shack at the Las Palmas Road entrance and an electronic gate at Riverview Court. Additionally there are security patrols in the evenings.

Subsequently our crime rate dropped substantially – certainly contrasted with Toro Park and other areas in Salinas. Neighborhood watch meetings are held and Police is invited to coach us on crime prevention. A Monterey County Sheriff recently remarked at one of these sessions how favorably Las Palmas I security compares with other areas patrolled by the County Officers. He also described his very large territory covered and that they are severely understaffed.

The projected senior care facility development threatens our achievement in shoring up personal and property security. This facility with 142 beds requires 92 employees, access for deliveries and services, visitors, etc. etc. This additional influx of non-LPI residents would enter at the Las Palmas Road intersection and quite overwhelm the guard services there and thus pose security risk. Moreover, the extra traffic burden entails serious hazard to both present home-owners and RVLP connected people in that the area is quite constricted. This is a safety risk we strongly object to.

3) **Economic Impact**

As explained above in the INTRODUCTION, the prime driver for people to buy into Las Palmas I is the quality and security of the surroundings, coupled with attractive and affordable homes in reasonable proximity to Monterey and Salinas. LPI is a safe place to raise children, for people to walk around their neighborhood, and enjoy the peace and tranquility of country setting.

All this represents VALUE and thus a purchase into this neighborhood is a huge investment for many of us, and the biggest asset for most of us.

The proposed senior care facility will certainly depress the value of our homes. More Traffic, More Noise, Less Security, More Risk, Less Harmonious Surroundings…….Fewer places for our families to live, play and grow will alter our quality of life forever.

We ask this fundamental question: why should the Applicant be able to maximize his investment at our homeowners' expense?

4) **Neighborhood Fit**

This proposed RVLP development is demonstrably a poor fit with the existing Las Palmas I community.

On October 26, 2015, the TORO LUAC committee heard the RVLP proposal from the Applicant. As that meeting was poorly noticed, the Committee "continued" the proposed project until better neighborhood participation was obtained and consistency with the Las Palmas Specific Plan was better understood. The continued meeting occurred almost a year later.

On September 26, 2016, the TORO LUAC reconvened and this time the meeting was very well attended by local residents. After hearing public comments from a sizable audience (> 35 people), the LUAC concluded the meeting with the following unanimous recommendation:

"Change project to adhere to the Las Palmas Specific Plan, which, according to County records of housing units already built, will allow three single family dwellings to complete the build-out of Las Palmas. As proposed, this is a commercial project, and is inconsistent with the residential neighborhood."

1) Considered from the Las Palmas I perspective this proposed project is diametrically opposed to the very reason people bought their homes here. It will no longer be a safe, secure, family friendly community.

   – A neighborhood sponsored, door to door survey in early 2016, given the choice between support for and opposition to the project as proposed, resulted in 93% opposition to the project. (sample size of 165 homes or 50% of 329 total in LPI). The project has not changed in scope or scale since 2016 so these findings are still directly relevant and valid. Signature sheets are available for inspection and will be (re) submitted to the County as Public Comment on the DSEIR.

   – In 2017 a similar effort by our HOA to gage neighborhood opinion resulted in 212 votes out of 329 homes:
      – Support : 9 Oppose : 153 Neutral : 50

   – While methodology differed between the two outreach approaches, the inescapable conclusion in both was overwhelming opposition to the proposed development.

2) Common sense observation: why contemplate a senior care facility located miles away from its essential medical infrastructure such as hospitals and clinics. Why isolate vulnerable older people on top of a hill with severely restricted ingress and egress, and lastly – why ignore the clear wishes of a majority of residents in the adjacent community by forcing an institutional business immediately adjacent to an established neighborhood?

3) In connection with the relationship between the Project Applicant and the LPI HOA, there is a false claim on page 4-17 in the DSEIR: i.e.

"*The project applicants, who own the site, are currently members of the Las Palmas Ranch Home Owners Association and have paid dues to the association".*

This is not true. The actual situation is the Applicant pays $40 per month as a "Road Maintenance Fee". This is a legacy payment reached as a "gentlemanly agreement" from earlier owners of the Parcel.

The Applicant is NOT a member of the Las Palmas I HOA.

Summary:

While adequate senior care facilities are clearly a desirable community objective where capacity is at issue, ***this*** proposed development is non-conforming on many levels as described in this report. No amount of mitigation can bring it into compliance. It is poorly conceived, as it isolates its residents and relies on remote medical and logistical support infrastructure. It is unsafe for both LPI residents and its own population. It is in direct conflict with the wishes of the vast majority of the established adjacent LPI community. It violates essential policies in the Las Palmas Ranch Specific Plan.

If the Board of Supervisors decides to amend the LPSP to force fit RVLP it will break faith with LPI residents on promises made when a prior Board of Supervisors first approved the LPSP. Las Palmas I relies on steadfast BOS support for the LPSP as initially approved to guarantee the integrity of its homes and environment.

This is the Wrong Project in the Wrong Location.

Please reject this project as described in the subject DSEIR.

Recommendation:

Applicant should consider building three homes on the site.

Letter 51

COMMENTER: Roy Gobets

DATE: April 6, 2018

Response 51.1

The commenter acknowledges the need to provide seniors with care and housing. The commenter states that the project would not be a good fit for the site due to the concerns listed below. The commenter recommends that the project be changed to a high-end housing project.

The commenter's recommendation is noted and is herewith shared with the County's decision makers for their consideration. The commenter's individual concerns are addressed below.

Response 51.2

The commenter states that the project would have an impact on the views from Scenic SR 68. The commenter states that the project would remove trees, and that landscaping would not screen the project or mitigate the defacing of the hillside. The commenter states that the project would impact the setting of the historic Corey House.

Please refer to Topical Response F regarding scenic resources and ridgeline development. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting. Further, while the project site is naturally elevated, nearby hills of substantially greater elevations would shield the site, with views of the site only momentarily visible to moving vehicles. Regarding Corey House, refer to Response 30.3.

Response 51.3

The commenter states that the project would degrade the visual character of the site and its surroundings.

Please refer to Topical Response F regarding the visual character of the site and its surroundings. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Response 51.4

The commenter discusses local air quality and the vulnerability of seniors to air pollution.

The comment refers to air quality impacts from sources other than the project. Note that the Draft SEIR analyzes impacts of the project on the environment, rather than impacts of the environment on the project. For additional discussion refer to Response 30.6.

Response 51.5

The commenter states that the project would cause objectionable odors from meals.

Odor is discussed in Section 6.0, *Air Quality,* of the Draft SEIR, and again in Topical Response C. Odors released outdoors from meal preparation would be intermittent and unlikely to be objectionable to the extent of causing a public nuisance.

Response 51.6

The commenter discusses earthquake risks. The commenter asks why a design level soil engineering investigation has not been included in the Draft SEIR.

The Draft SEIR includes a Geologic Hazards Report and Soils Engineering Investigation in Appendix F of the Draft SEIR. This preliminary report addresses the feasibility for the site from a geologic viewpoint, with emphasis on the potential for geological and seismic-related hazards. The report concludes that the site is suitable from a geologic and soil-engineering standpoint for the proposed development provided that the preliminary recommendations contained in the report are implemented in the design and construction. As stated on pg. 15 of the preliminary report, the site is located in the seismically active Monterey Bay region of the Coast Ranges Geomorphic Province. The site is not located within any Earthquake Fault Zones in accordance with the Alquist-Priolo Earthquake Fault Zone Act. The Blanco section of the Reliz fault is located approximately 300 feet east of the site. The Reliz fault has displayed late Quaternary displacement, but it is not located on the subject site, therefore potential for surface rupture to occur on the site is low. Strong ground shaking associated with major earthquakes along the San Andreas and other nearby faults will undoubtedly occur at the site in the future. The authors of the report recommend using current CBC Seismic Design Parameters, as listed in the report. 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.

Response 51.7

The commenter states that the project would increase the area's exposure to landslides.

Please refer to Topical Response E. As noted therein, 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, including landslides.

Response 51.8

The commenter states that the project would increase stormwater runoff. The commenter states that the project would contribute to flood risks in the Subdivision.

Please refer to Topical Response E for a discussion of stormwater drainage. As noted therein, the project would not result in significant impacts related to flooding. Stormwater drainage of the project site would prevent flooding of the site's entrance.

Response 51.9

The commenter states that the project would physically divide an established community. The commenter expresses concerns regarding the safety of pedestrians and bicyclists within the Subdivision, and potential impacts to quality of life.

Please refer to Response 30.11.

Response 51.10

The commenter states that the project would conflict with Monterey County General Plan policies that limit and regulate growth.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 51.11

The commenter states that the project violates the LPRSP by inducing population growth.

Please refer to Topical Response C regarding growth inducement. As stated therein, while the proposed project would indirectly result in business and population growth due to the increased local investment from revenues generated by the project, projections of any potential growth would be speculative.

Response 51.12

The commenter states that the project would impact wildlife, including protected salamanders.

The incidental observation of a CTS by a private citizen is undocumented and cannot be verified; however, a desktop level review is provided in Response 5.2 to support the assessment of CTS habitat at the project site. For additional detail refer to Response 5.2 and Topical Response G. As discussed therein, the small size of the project footprint, and the placement of the project site among residential and agricultural development decreases the value of habitat for special status wildlife. Impacts to common wildlife species would not be considered significant under CEQA, and potential impacts to special status wildlife is mitigated through implementation of the Draft SEIR mitigation measures requiring preconstruction surveys and avoidance, and through the implication of the additional mitigation measures proposed in Response 5.2.

Response 51.13

The commenter states that the project would have noise impacts related to commercial operation, emergency vehicles, mortuary transport, construction activities, noisy residents, and reduction of natural vegetation noise barriers.

Please refer to Topical Response H, which includes a detailed discussion of the operational noise impacts of the project. As described therein, operational noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 51.14

The commenter asks why comment from public agencies is not provided in the Draft SEIR.

Public agency comments are received and responded to concurrently with public comments. Public agency comments are included in this Response to Comments document. Please refer to responses to the following letters: Letter 2 (Monterey Bay Air Resources District), and Letter 3 (Monterey County Water Resources Agency). Comment letters from additional agencies were not received, although copies of the document and notification of the public comment period was provided, as noted in Letter 1 from the State Clearinghouse.

Impacts related to fire protection, police protection, parks, water resources, and public works are described in Section 11.9 through Section 11.12 of the Draft SEIR. These impacts were determined to be less than significant.

Response 51.15

The commenter discusses the project's traffic impacts and states that the Draft SEIR does not consider traffic impacts in the Subdivision. The commenter states that the project would increase traffic safety risks.

Please refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision, and the project would not result in a significant impact related to traffic safety.

Response 51.16

The commenter states that the project would have impacts on emergency response access and fire safety.

Please refer to Topical Response B. As noted therein, Section 11.9, *Public Services*, of the Draft SEIR has been revised to clarify that the project would have a less than significant impact on fire and police protection services. Implementation of the project would not require new or expanded public facilities to continue providing the existing level of public services experienced by residents in the vicinity of the project site.

The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. For additional detail pertaining to emergency access, refer to Topical Response D.

Response 51.17

The commenter discusses wastewater treatment for the project and states that more input is needed from public agencies. The commenter states that the project would impact stormwater drainage.

Wastewater is discussed in Section 11.12, *Wastewater*, of the Draft SEIR. For comments on water issues provided by the Monterey County Water Resources Agency (MCWRA), please refer to Letter 3. For discussion of stormwater drainage, please refer to Topical Response E. As noted therein, the project would not result in significant impacts related to flooding. Stormwater drainage of the project site would prevent flooding of the site's entrance.

Response 51.18

The commenter discusses water supply issues and questions the issuance of a "Can and Will" letter to serve the project.

California Water Service has confirmed that it can and will serve the project, which indicates the applicable water purveyor for the site is able to provide water supply for the proposed project. An updated letter dated March 26, 2019 is included in Appendix I-2. For discussion of water supply impacts, refer to Section 10.0, *Water Supply,* of the Draft SEIR, and Responses 3.1 through 3.5.

Response 51.19

The commenter asks if public agencies commented on the project's solid waste disposal impacts.

No comments were received from public agencies regarding solid waste. Solid waste impacts were described in Section 11.11 of the Draft SEIR, which concluded impacts would be less than significant.

Response 51.20

The commenter states that the project would have cumulative traffic impacts and that the project would result in greater traffic noise and safety concerns than residents anticipated when they bought homes in the Subdivision.

Please refer to Topical Response D and Topical Response H. As described therein, the project would not result in a significant impact related to traffic safety or operational noise, with the exception of traffic impacts to SR 68, which would be significant and unavoidable.

Response 51.21

The commenter introduces a section of "non-CEQA" concerns and states that these concerns are not addressed in the Draft SEIR. The commenter provides background information about the Las Palmas Ranch Plan Area. The commenter lists concerns related to fire prevention, safety and security, economic impacts, and neighborhood fit. The commenter asks why fire prevention is not covered under CEQA. The commenter disputes the statement in the Draft SEIR that the project applicants are members of the Las Palmas Ranch Home Owners Association (LPHOA).

Fire protection is discussed in Section 11.9, *Public Services,* of the Draft SEIR. Wildfire impacts are discussed in Section 11.5, *Hazards and Hazardous Materials,* of the Draft SEIR*,* and Topical Response B. As noted in Topical Response B, Section 11.9, *Public Services,* of the Draft SEIR, has been revised to note that the MCRFD reviewed the proposed building and site plans, and has determined the project would not require new or expanded public facilities to continue providing the existing level of public services experienced by residents in the vicinity of the project site. The proposed site plan has been designed to comply with the County's fuel modification standards (Title 18, Chapter 18.56.090 *Fuel Modification Standards*) to minimize potential wildfire hazards on the project site and vicinity. Impacts related to wildfire and fire protection would be less than significant.

For a discussion of security and safety refer to Topical Response A. As noted therein, the assisted living facility would have its own security staff on site to monitor activities at the facility, and the project would participate proportionately in the cost of the Subdivision's security service. To clarify the proposed cost-sharing arrangement, the Draft SEIR has been amended to clarify that a written agreement between the project applicants and the LPHOA would be required in order to clarify cost-sharing and responsibilities associated with the streets, drainage facilities, and security operations . In addition, Section 11.9, *Public Services,* of the Draft SEIR, has been revised to include information about staffing and personnel at the Monterey County Sheriff's Office, which currently maintains a service ratio of approximately three sworn officers for every 1,000 residents (unincorporated). Upon review of the project and existing personnel and support, the Sheriff's Office determined that no expanded or new facilities would be required to continue providing police protection to the Las Palmas community even with the addition of the proposed project.

As described in Topical Response C, property value and neighborhood fit are not environmental impacts and are not directly analyzed in the Draft SEIR. The Draft SEIR does include analysis of traffic and noise impacts. All impacts were determined to be less than significant or less than significant with mitigation incorporated, with the exception of traffic impacts to SR 68, which would be significant and unavoidable. For a discussion of traffic, refer to Topical Response D, and for a

discussion of noise, refer to Topical Response H. Topical Response C also explains that the project would be consistent with the site's zoning and land use requirements.

Page 4-17 of the Draft SEIR states that the project applicants are members of the LPHOA, have paid dues to the association, and would pay a proportionate share for the use of the roads and the drainage system. As noted in Topical Response I, page 4-6 of the Draft SEIR has been revised to clarify that an agreement would be required between the LPHOA and the project applicants, who own the project site, to clarify cost-sharing and responsibilities associated with the streets, drainage facilities, and security operations.

Letter 52

Received by RMA-Planning
on April 6, 2018.

Sidor, Joe (Joseph) x5262

From: Lindsay Romiza <lindsayromiza@gmail.com>
Sent: Friday, April 6, 2018 10:50 AM
To: Sidor, Joe (Joseph) x5262
Subject: RVLP Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Mr Sidor,

We are writing you because we are very concerned about the proposed commercial project for several reasons.
First reason is that our home is here, our largest investment, in both memories and financially, that we have enjoyed for the past 13 years.
The idea that the County might approve the application for a large commercial business to be built in a private neighborhood is disturbing & scary.

We are passionate about where we live. We invested in this neighborhood of 329 homes, mostly families with young children,
because of it's privacy and park like setting. The "Las Palmas Specific Plan" currently allows three additional residences to be built on Parcel Q
and it should remain residential only. The proposed development by Mr Shingu is a business, not a residence. Businesses make profits, homes do not.
We are not against senior housing, but we are against a commercial business being built within our neighborhood boundary.
Mr Shingu purchased the property without regard to the residents of Las Palmas 1 and we are asking you to please Not Approve Mr Shingu's application!

Do you know that Mr Shingu has this property for sale on the internet? He purchased Parcel Q knowing he
had to hire top attorneys and change the "Las Palmas Specfic Plan". We, along with many other residents, have had to dedicate our
personal time to research the effects of his proposal and an on-going effort to educate neighbors about the application and it's process. If approved, by you,
we will lose, at his profit, everything we have worked so hard for. Las Palmas 1 will forever be changed if his commercial business application is approved by you.
Please do not approve it!

A huge concern will be the additional traffic that will be going in and out of Las Palmas Road from River Road. We already have, on the average, 100
cars per month making U turns at the intersection because drivers are lost. The private entrance to Las Palmas 1 will become a major traffic
crossing. The curve on River Road (blind spot) has already proved to be fatal with the death of one child. Several accidents have also taken place at this intersection.
Please do not put the residents and/or visitors of Las Palmas 1 at an even greater risk of more and more car accidents and possibily another fatality.
Please do not approve Mr Shingu's application!

Have you visited Las Palmas 1 and walked our parks and strolled our streets? Las Palmas 1 is a quiet neighborhood with parks, residents enjoying

the comfort of walking the street, children playing catch, basketball and riding their bikes in the street, folks walking their dogs and simply enjoying the outdoor life style.
Our parks and the Eucalyptus trees are habitats for many animals, including Monarch butterflies, hawks, owls and quail. Please don't take that away from us!
Letting Mr Shingu destroy our park and quite streets for his commercial business opportunity doesn't make sense in a world where having a safe
place to roam around in the parks and streets, with friends/family/pets, is rare in most areas.
Please do not allow this to happen to 329 residences of Monterey County that chose to make Las Palmas 1 life style their home!

There are so many other areas where Mr Shingu could have purchased property that is not already in an established residential neighborhood and
zoned only for residential use. He saw an opportunity and chose to use the system to get what he wants no matter the cost, financial and emotional, to the 329 home owners that
bought here for the privacy Las Palmas 1 is well known for. Mr Tony Lombardo is Mr Shingu's attorney and to share an interesting point, we have included a paragraph
for you to read from The Carmel Pine Cone dated 11-5-15, titled "Dog Park rejected..." where Mr Lombardo represented Quail Lodge; "According to Lombardo, the canine center
would generate significant amounts of unmitigated traffic" and "increase water use" ..." We find it interesting that Mr Lombardo takes the opposite side of the spectrum when
hired by a developer seeking profit, to do the same thing the dog park representatives wanted in Carmel Valley. In addition, Mr Shingu, with Mr Lombardo present, has been asked
by homeowners to stop this process and find an alternative site and/or access to his retirement facility.
If approved, Las Palmas 1 will decline in value, and it's unique family atmosphere will fade away.

Another major concern is the construction of such a project on a hill that has already proved to be unstable. Attached are three photos of the recent
landslide (November 2017). This is the second such landslide, and that's without all the construction, bulldozers and cement trucks moving dirt around
on top of the hill. The recent Montecito fire/mudslides, near Santa Barbara, are something very real that could happen on that hillside if the conditions are right. Probably most of
the letters you get will be from those folks that line the bottom of that particular hillside. Let's not risk it!

There are many factors as to why Mr Shingu's application should be denied. They include, 2 plus years of noise pollution with construction trucks driving up and down
the hill, which is estimated to be a 50% grade, light pollution, decline of water resources, fire hazards, evacuation concerns and only one road in and out. There will be
an increase of traffic throughout Las Palmas 1 because Las Palmas Road will back up and drivers will reroute, to enter and exit, through our private gate entrance at Riverview Court.
The ridge line is another area of concern. In the beginning, you could see the bright orange tape from River Road. The tape has since faded and newer homeowners are not
given the full opportunity to judge the ridge line because the tape needs to be replaced for proper evaluation. The lights shining down from the buildings above Las Palmas 1 homes
will be a major problem for homeowners that line the bottom of the hillside. There are many other reasons to not approve Mr. Shingu's application, but the main reason is
that it is simply not the right fit for Las Palmas 1 and the "Las Palmas Specific Plan".
Please do not approve Mr Shingu's application.

We hope you take all of our concerns seriously and would appreciate your response to each of them.

Respectfully,

Lindsay & Anthony Romiza
17724 Riverbend Road

Letter 52

COMMENTER: Lindsay and Anthony Romiza

DATE: April 6, 2018

Response 52.1

The content of this letter is the same as the content of Letter 31. Please refer to Responses 31.1 through 31.6 above.

April 7, 2018

Letter 53

RECEIVED
APR 09 2018
MONTEREY COUNTY
PLANNING DEPARTMENT

Carl Holm, Planning Director
Joseph Sidor, Associate Planner
Brandon Swanson, Planning Manager
Monterey County RMA
Planning Second Floor
1441 Schilling Place
Salinas, CA 93901

Dear Mr. Holm, Mr. Sidor and Mr. Swanson,

I live in Las Palmas 1 and strongly oppose the proposed development, Riverview at Las Palmas (PLN#150372). I chose this community as a quiet, safe and calm environment in which to reside. This large commercial development does not meet the criteria for the Las Palmas mission of a peaceful rural residential neighborhood. The following is a list of issues arguing against such a development in our neighborhood. 53.1

Traffic:

- River Road Traffic: The stop light at LP1 entrance has seen 20 accidents over the last 10 years. One 4-year old child has already died by a texting drunk-driver. Additional traffic for the "Parcel Q" will aggravate this situation.
- Potential Accidents: Currently, the curve blocking the visual to the LP1 light going South, allows only 4-5 seconds (traveling at 55 mph) before reaching the intersection. This short distance is suspected as the cause of several accidents at this point. If the proposal goes through, any celebrations with family members over holidays and family events at "Parcel Q" will significantly increase the traffic load and potential for further accidents.
- Security Stops: Traffic already backs up into the River Road exit lane at peak times due to our security checkpoint. Adding 50-90 cars and construction vehicles a day will increase the potential for further traffic congestion and accidents. 53.2
- Emergency Situations: The potential for a fire on the south end of the canyon would necessitate immediate evacuation of all members of the community. A NW wind could spread fire exponentially in these closely packed houses, as seen in recent fires in northern and southern California. There are 2 exits for over 300+ homes, plus the emergency vehicles, potential staff and patients! 53.3
- Construction Traffic: The traffic generated by the construction phase will be extremely problematic. This quiet valley is nestled between two large hill sides. Any construction traffic noise would be echoed off the hills. Construction and delivery equipment would need to climb a steer entrance road at low gear. Any subsequent grading equipment will emit a loud back up beeping noise that will be heard from all LP1 units. This constant and increased traffic would irrevocably alter the safe, peaceful nature of the community. This will also severely disrupt the area wildlife habitats.
- Commercial Traffic: The proposed development would bring increased emergency fire and ambulance calls (with blaring sirens) as both are required to attend. These will bring unwanted noise and light pollution at all hours of day and night. Any commercial vehicles – food deliveries, medical waste, trash, linen, etc., and potentially 90+ employee vehicles will funnel through a narrow street 53.4

originally designed for residential traffic. LP1 residents pay for these roads to be maintained/re-paved. This additional traffic will certainly increase expenses of road repair, in turn raising the homeowners' costs.

Security

- Security of the neighborhood would be compromised on LP1 community. As this will open the neighborhood to non-residential traffic, we fear an increase in crime that has decreased since installation of LP1 security personnel. There is no way to regulate this increased traffic and guarantee the security of our neighborhood. This is a real concern.

53.5

The Proposed Non-Residential Development is Inconsistent with the Existing Residential Community

- Under The Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood.
- This parcel is zoned "medium density residential," at 2.61 units per acre. Under the Las Palmas Plan this parcel was specifically approved for 8 units total. The developer now seeks a "conditional use permit" to allow development of a non-residential facility with a total of 105 units. This is inconsistent with The Las Palmas and Monterey County Plans.
- The developer seeks to circumvent these plans by requesting an amendment for a non-residential use. Specifically, the developer asks you approve an amendment with the following language; "Assisted living facilities are not considered residential units (and should not be) subject to the residential limitation of the (Las Palmas) Plan." An assisted living facility is not a residential use, because it does not operate or function in a manner like single family units.
- Las Palmas is a highly desirable residential community with stable property values. Residents fear the loss of their investment potential due to the nature of this development. Several people have moved out fearing this project.
- To approve this amendment to the Las Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would destroy the rural residential nature of our community.

53.6

Intrinsic Values: Development of this size will alter our environment.

- The location in question has 80+ eucalyptus trees that will be removed under current plan. These provide reduction in wind, ridgeline exposure and Hwy 68/RR sound abatement.
- Moreover, these 70+ year old eucalyptus trees are home to several generations of Red Tailed Hawks and Great Horned Owls. Last year we had an overabundance of voles (large field mice) which were running around even in daylight. These essential predators were active in vole reductions. Watching these great birds soar and perform aerial ballets over our hillsides is unmatched in Salinas proper.
- Bobcats and deer live up on the hillsides and flats of the area in question. Last year one female bobcat brought her 3 cubs out into our common area multiple times. This was a delight of all who caught this rare event. One mother deer has birthed 5-6 pairs of babies over the last few years and we have watched them grow into adulthood.
- Destabilization of the steep hillsides in question is a serious threat to mudslides. We have experienced similar abundant rain-slide events even without any development activity.
- There is a sense of fear in LP1.

53.7

- Light Pollution: We currently are able to view changing of the planets and star constellations due to our unpolluted dark areas. This will stop under the PLN#1500372.
- Noise: A friend who worked to help develop a similar nursing home in Hollister indicated the potential of "Screamers" being heard in the night is real. She later regretted helping this proposal from just this perspective. Noise from construction would also be very disrupting to all. 53.8
- Smells: As this proposed facility will generate substantial numbers of meals, we will not enjoy sharing their menus due to prevailing winds. Our air is very clean here; let's keep it this way!

I request you please carefully evaluate these issues when considering this proposed development. Residents value this land and putting a commercial facility near it would certainly decrease its value significantly. While I support the need for residential care facilities, the location of such would be best in a commercial zone, rather than our peaceful residential one. Please do not devastate our neighborhood's fine condition with this proposed commercialization.

Thank you for your consideration,

Sincerely,

Jeannette Warzycki

Jeannette Warzycki
(831) 238-2439
April 7, 2018

Letter 53

COMMENTER: Jeannette Warzycki

DATE: April 7, 2018

Response 53.1

The commenter states that they are opposed to the project.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration. The commenter's specific concerns are addressed below.

Response 53.2

The commenter states that the Subdivision entrance has existing traffic safety issues that the project would exacerbate. The commenter states that the project would congest traffic at the security gate.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 53.3

The commenter discusses emergency evacuation concerns.

The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. Also refer to Topical Response D.

Response 53.4

The commenter describes concerns about construction traffic, commercial traffic, and emergency response traffic. The commenter states that the project would result in damage to the Subdivision's private roads.

Please refer to Topical Response D. As described therein, construction and operational traffic impacts to Subdivision roads are less than significant or less than significant with mitigation incorporated. Additionally, mitigation is required to improve emergency access and evacuation to and from the site.

Response 53.5

The commenter states that the project would compromise security in the Subdivision.

Please refer to Topical Response A for a discussion of the project's impacts on security operations. The project would not result in a significant impact on police service or emergency preparedness within the Subdivision. Regarding the Subdivision's private security operations, an agreement would

be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Response 53.6

The commenter states that the project is not consistent with applicable land use plans and would reduce the property values of neighboring residences.

Please refer to Topical Response C. As noted therein, the project would be consistent with LPRSP policies and property value is not an environmental impact and therefore is not analyzed in the Draft SEIR.

Response 53.7

The commenter states that the project would cause noise impacts, impacts on wildlife, and would destabilize the hillside.

Please refer to Topical Response E regarding hillside destabilization. As noted therein, compliance with recommendations in the geotechnical report, which would be required as a condition of project approval, and compliance with applicable County code requirement would ensure there would be no significant impacts associated with hillside erosion.

Regarding impacts to wildlife, please refer to Topical Response G. As stated therein, impacts to wildlife would be mitigated to less than significant by preconstruction surveys and avoidance.

Please refer to Topical Response H, which includes a detailed discussion of the long-term noise impacts of the project. As described therein, long-term noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 53.8

The commenter lists concerns related to light pollution, noise impacts, and odors.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

Please refer to Topical Response H, which includes a detailed discussion of the long-term noise impacts of the project. As described therein, long-term noise impacts would be less than significant or less than significant with mitigation incorporated.

Odor is discussed in Section 6.0, *Air Quality,* of the Draft SEIR, and again in Topical Response C. Odors released outdoors from meal preparation would be intermittent and unlikely to be objectionable to the extent of causing a public nuisance.

Letter 54

Received by RMA-Planning
on April 9, 2018.

Sidor, Joe (Joseph) x5262

From: Todd Ruston <todd@hackneyponies.com>
Sent: Sunday, April 8, 2018 6:43 PM
To: Sidor, Joe (Joseph) x5262
Cc: ceqacomments; roygobets@aol.com
Subject: River View at Las Palmas project comments (PLN150372)

Dear Joe,

I am writing in opposition to the *River View at Las Palmas* project in its current form, specifically related to traffic and related safety issues. Its proposed use of Las Palmas 1 neighborhood roads would impose regular commercial traffic (truck deliveries, employee shift changes, etc) and increased emergency responder traffic (fire and ambulance response) on tight residential roads frequented by children. The increased traffic would disrupt the quiet residential nature of our neighborhood, and increase the risk of accidents and injuries to vulnerable residents. 54.1

However, I do in general support senior housing projects for the Salinas area such as this, and would support the project if it had direct access to River Road, and did not utilize any Las Palmas neighborhood roads or property for ingress or egress. The easement allowing access to Parcel Q on Las Palmas I roads was created for additional neighborhood residential housing, not a commercial facility with almost three times the originally envisioned number of dwelling units plus associated staff. I strongly urge the developer to find alternate access or an alternate site for his proposed facility. 54.2

Please confirm receipt of these comments and entry into the record for this project.

Sincerely,

Todd Ruston
17644 River Run Rd
Salinas, CA 99308
831-455-7927

[This email constitutes the entire message. No attachments are included.]

Letter 54

COMMENTER: Todd Ruston

DATE: April 8, 2018

Response 54.1

The commenter states that they are opposed to the project. The commenter cites concerns about traffic, safety, and emergency response access.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic, safety, and emergency evacuation. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks. The project would not result in a significant impact on police service or emergency preparedness within the Subdivision. Regarding the Subdivision's private security operations, an agreement would be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Response 54.2

The commenter states that the ingress and egress rights allowed to the project site were intended to serve a much smaller number of residents. The commenter urges the developer to find an alternate site or alternate access for the project.

Please refer to Topical Response D for a discussion of project site access. As noted therein, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classifications , and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

Letter 55

April 8, 2018

Mr. Joseph Sidor, Associate Planner
Mr. Brandon Swanson, Planning Manager
Monterey County Planning Commission

RECEIVED
APR 12 2018
Monterey County RMA

Dear Sirs,

We have been the owners of our home at Las Palmas 1 for 20 years and are strongly opposed to the **Proposed Development of Riverview at Las Palmas (PLN#150372)**. 55.1

The proposed development is totally inconsistent with our rural, residential community for the following reasons:

1. **Safety and Security**

Our community has taken steps to preserve our neighborhood security by employing security guards to check all incoming traffic, installing gates, and implementing a Neighborhood Watch program. There are many "new' families who have moved in with little children, feeling secure that our neighborhood is safe. We are very concerned that the proposed development would allow constant traffic throughout the day and evening with no way to regulate the security of our neighborhood. Currently, there are many families with young children who feel free to ride their bicycles and play without fear of outside visitors or unauthorized persons driving through the area. 55.2

In addition, with the proposed number of units and staff, it is highly probably that traffic would be backed up onto River Road which is a safety hazard. People tend to speed along this road and there have already been fatalities as a result.

2. **Emergency evacuation**

We are all too aware of the recent tragic fires and floods throughout California which caused folks to evacuate with little notice. There was huge property loss and loss of life. In the terrible event of earthquake, fire or flood, it would be very challenging to evacuate not only our residents but those up on the hill with only one road out. When we first moved here, we did have to evacuate due to flood warnings and there was no way to get in and out of LPR 1 for three days. 55.3

3. **Emergency Services**

We are aware that the development, with it's assisted living facility, is far away from existing hospitals and presents a hardship for emergency services and potential delay in the likely frequent transport of residents to acute care facilities. 55.4

4. **Inappropriate fit with our residential community**

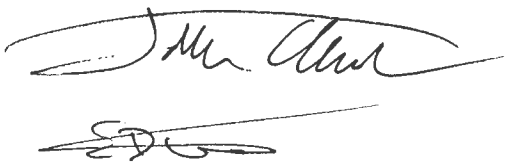
LPR 1was approved and developed as a rural residential neighborhood. This was a large reason that we bought our home here in the first place. We were assured that any development on the "hill" would be minimal and consistent wit the Las Palmas Plan and Monterey County Plan. The parcel is zoned "medium density residential" and was 55.5

specifically approved for a total of 8 units. Assistant living facilities are not considered residential units.

There are numerous other issues regarding the above proposal which are not addressed in the draft EIR. The prospect of having a large development on the hill above us looking down into our neighborhood has great impact on our sense of privacy and disrupts the natural surroundings that attracted us to this neighborhood. It will also likely have a negative impact on our home value. There is little mention in the proposal of the impact this development would have on our community which displays a callous disregard of the developers for the wellbeing of their potential neighbors. We urge you to deny this proposed development in view of the above concerns. 55.6

Thank you.

Sincerely,



Dr. John Clark
Dr. Eveline Clark
17544 Woodridge Ct.
Salinas, CA 93908

Letter 55

COMMENTER: Dr. John Clark and Dr. Eveline Clark

DATE: April 8, 2018

Response 55.1

The commenters state that they are opposed to the project.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration. The commenters' specific concerns are addressed below.

Response 55.2

The commenters describe traffic-related safety impacts.

Please refer to Topical Response D. As described therein, the project would not result in a significant impact related to traffic safety.

Response 55.3

The commenters describe concerns related to emergency evacuations.

The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. Also refer to Topical Response D for additional discussion.

Response 55.4

The commenters state that the senior assisted living facility would be far from hospitals and would present a hardship for emergency response services.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR, and proximity to a hospital is not an environmental issue. The proposed location offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access. Salinas Valley Memorial Healthcare, the nearest hospital to the project site, is approximately five miles from the project site.

Response 55.5

The commenters state that the project is not an appropriate land use for the project site.

Please refer to Topical Response C regarding land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 55.6

The commenters state that the project would impact home values of neighboring residences. The commenters urge denial of the project.

Please refer to Topical Response C. As described therein, property value is not an environmental impact and therefore is not analyzed in the Draft SEIR.

Received by RMA-Planning
on April 9, 2018.

Letter 56

Address:

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, (831) 755-5334 same physical address
swansonb@co.monterey.ca.us

Jacqueline Onciano, Chief of Planning, (831) 755-5193, same physical address

oncianoj@co.monterey. ca.us

Carl Holm, Planning Director, (831) 755-4879, same physical address
holmcp@co.monterey.ca.us

roygobets@aol.com , Roy Gobets (831) 235-1701 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Gentlemen:

I am a new resident of Las Palmas I.

Having reviewed the Report, I have several concerns on the scope of the project, impact on traffic, security, environment, quality of life, and the value of my property.

I am opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372), this large proposed non-residential development is inconsistent with the peaceful rural residential nature of the Las Palmas community.

1 Traffic

Traffic: First hazard to the community

During the construction

56.1

- Trucks with dirt load to level the parcel and the maintenance of the parcel (trees…)
- Engine for structuring the place on flat-bedded trucks
- Trucks for watering the surface
- Trucks loaded with construction material.

All of them passing by the gate around the entrance park and running to or from the project facility, will make a major hazard to the community, children, adults, and pets. Also concern about the stability of the pavement, bordures and trees with an important flow of heavy truck traffic (we monthly pay an HOA fee for maintaining all infrastructures).

After the construction

- Food deliveries (1)
- Emergency vehicles (2)
- Medical waste
- Trash
- Linen, cleaning suppliers and others
- Employees (3)
- Residents of the facility (4)
- Guard (+/- 20% traffic increase)
- Visitors parking (5)

1) **18 wheelers** will be a big concern in the narrow streets along the park
2) This project is **miles far away** from the closest hospital, doctors…. Fire trucks, Police, emergency vehicles will have to enter the community on a regular basis.
3) Adding from 100 to 200 more residents could impact all roads around – 68, River Rd. -
4) **No** grocery stores, hairdressers or any commodities, malls, etc. at a 3/7 miles radius. There are no pedestrian facilities on SR 68, Reservation Road, or River Road. Pedestrian facilities are provided within the Las Palmas Ranch development along internal roadways. The only way to take a walk will be to use the Las Palmas Ranch park and trails.
5) There is no parking for visitors at the project plan, where will the visitors park? In Las Palmas parking and streets? One more hazard.

All vehicles will go through a narrow street originally designed for residential traffic, using the guard entrance. There are no alternate routes in and out of the facility indicated on the site plan.

Guard entrance

Using the same entrance for all listed above, could lead to a long line of waiting cars and trucks for clearance by the guard, especially during rush hour, increasing hazard for the community on River Road.

Emergency in case fire, flooding or other disaster - Disaster evacuation case, this is another major problem.

56.2

From the residents: **340 homes**

- **340+ cars or pickups** going to only one exit toward River Road.

56.3

Adding a new flow from the project: 144 beds + 12 to 21 employees on site each day

- **50 to 100 more cars + bus + emergency vehicles.**

This is around 400/450 cars-pickup-emergency vehicles

going to one exit,

a **20 to 25% traffic increase**.

From ***one problem*** (fire, flooding, quakes), we will add ***the human hazard*** on top of a natural disaster, all vehicles will go through a narrow street originally designed for residential traffic, using the same exit. ***There are no alternate routes in and out of the facility indicated on the site plan***.

Concern on traffic

Las Palmas is a quiet community -- children playing, people walking dogs, and residents enjoying the peaceful nature at the foothills of the Toro Park.

There is no compatible way between this development and the added traffic using the existing entrance to our neighborhood.

2 Security

Security is the second hazard to the community

Residents are secure, the **HOA guard** keep them informed about who comes into our community.

During the construction

56.4

- Security of the neighborhood would be compromised by opening the neighborhood to non-residents.
- As a community we have taken steps to preserve the security of the neighborhood including installing gates and employing security guards to check all incoming traffic.

After the construction

- The guard's duty is to link a visitor to a house in the Las Palmas community. Who would he call when the visitors would like to enter the community?
- As visitors of the facility, anybody will be able to enter the community.
- This proposed large non-residential development would open the neighborhood to incessant traffic, coming and going throughout the daytime and evening.
- It would be almost impossible to regulate this traffic and guarantee the security of the neighborhood.
- Make the entrance of Las Palmas Ranch 1 on River Road a challenge.

3 Environment

Environment and aesthetic is the third hazard to the community. This residential community is along the Toro Park foothills (State Park), and the large proposed non-residential development is inconsistent with the peaceful rural residential nature of the Las Palmas community. 56.5

The nature has designed the hill over the time, with rain and wind, if the project changes this balance; We will have flooding and mudslides during the rainy season, we already had severe floodings at the bottom of the hill in the fire department trail. Above and around the community, a wild community exists with more than **80 (70+ year-old) eucalyptus trees:**

- Habitat for Barn Owls** (endangered species) we can hear their hooting at night
    - There are feeding on mice, rats…, destroying their habitat could result to a proliferation of pest – like Voles (large field mice).
- Habitat for Great Horned Owls
    - There are feeding on mice, rats…, destroying their habitat could result to a proliferation of pest.
- Red Tails Oak
- Coyotes
- Bobcats
- Mountain Lions
- Deer
- A large diversity of birds in the trees area

**The Barn Owl is considered endangered now. A lack of environment remaining as well as access to food has put it on this list. That means that they can't find what they used to consume in such areas before. The fact that there are various farming methods that require moving around crops is part of this. The other is that many farmers continue to plant more and more to keep up with demand.
http://www.owlworlds.com/owls-endangered/

On the project area, more than **80 (70+ year-old) eucalyptus trees**, only seen in this area, that will be removed under current plan. 56.6

- These trees provide reduction in wind, ridgeline exposure
- Hwy 68/RR noise abatement.

Concerns

Having a large and flat surface for the project: 56.7

- Will add a large amount of water going to the already too **small drain collector**.
- The water will use the road to the park as a quick evacuation.
- Adding more water at the bottom of the project will increase the chance of flooding.
- This last concern will make evacuation another **hazard to the Las Palmas Ranch 1 community**.
- Make **mud slides**, like winter 2016 under the project area.

Environment: *Noises during* and after *the construction (**echoing in the Las Palmas Ranch Valley**)*

- Cutting the trees
- Beeping sound of trucks and engine
- Truck engines leveling the project area
- All trucks engines digging operation
- Construction truck engines and other
- Truck engines surfacing the streets
- Food and other deliveries trucks
- Emergency vehicles (several a week)
- Visitors
- Employees
- General use of the project

56.8

Environment: Dust during and after the construction

- Cutting the trees (dust from wind)
- Leveling the project area
- All digging operations
- Construction
- Surfacing the streets
- Trucks going to or from the area

56.9

Environment: Smell during and after the construction

- Substantial numbers of meals
- Leveling area trucks engine
- All digging operation engine
- Construction products, roofing…
- Surfacing the street -gas and more-
- Trucks going to or from the area
- Regular operative odors
- Kitchens lunches, dinners…

56.10

4 Aesthetic

From all around our community, we enjoy the view of Toro Park hills, a peaceful rural residential area with nature as our backyard.

Trees, more than **80 (70+ year-old) eucalyptus trees**, only seen in this area (the only set of it are just here at the project development area) 56.11

- **From outside the community** would be able to see a disfigured landscape from
  - River Road,
  - 68 from Salinas
  - 68 to Salinas,
  - Spreckels Road
  - While Hiking in Fort Ord Monument, the project would be seen from a distance
- **From inside the community**: Project could be seen from almost every corner of Las Palmas Ranch

Concern

For all the describe above, a large non-residential development is firstly inconsistent with the peaceful rural residential nature of the Las Palmas community, and secondly this will bring the houses value down.

The Proposed Non-Residential Development

- Under the Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood.
- We have purchased our home and started to build our lives in reliance on Plans that provided an opportunity to live in and enjoy a rural residential neighborhood
- This parcel is zoned "medium density residential," at 2.61 units per acre.
- Under the Las Palmas Plan, this parcel was specifically approved for 8 units total, not 105 units as the project needs.

56.12

An assisted living facility **is - not a residential use**, because it does not operate or function in a manner like independent residential units' employees are making the facility working not residents.

Conclusion

WHY HERE?

This is inconsistent with The Las Palmas and Monterey County Plan

1. In the report, there is **no mention on impact on life and depreciation of living for the Las Palmas residents**, it's looks like **we are the negligible amount**.
2. (***From 8 units as MDR to 105 units***) This parcel is zoned "**medium density residential**," at 2.61 units per acre. Under the Las Palmas Plan, this parcel was specifically approved for 8 units total. The developer now seeks a "**conditional use permit**" to allow development of a non-residential facility with a total of 105 units.
3. (**Non-residential development)** The proposed development is a **non-residential use**. The proposed Assisted Living Facility does not operate or function in a manner consistent with the Las Palmas Plan, nor the rural nature of the community.
4. (**Non-residential development)** Approving this amendment to the Las Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community and the value of each house.
5. There are no facilities of any type in a 3 to7 miles radius for the project residents.
6. (**The Residents first**) Las Palmas is a highly desirable residential community. Residents have invested here, based on the rural nature of this community under the approved Las Palmas Plan. Residents have relied on the approved Las Palmas Plan and its resulting development.
7. (**The Residents first**) The major risk for the Las Palmas residents is a large devaluation on the houses pricing.

56.13

I respectfully request you to carefully consider these issues when considering this proposed development **having first in mind the 340 houses' residents** of the Las Palmas Ranch 1.

Thank you for your consideration.

Respectfully submitted.

Richard Fontana

Website Designer in Las Palmas1

Letter 56

COMMENTER: Richard Fontana

DATE: April 9, 2018

Response 56.1

The commenter states that traffic would be a hazard to the community, congest the Subdivision entrance, and damage Subdivision roads.

Please refer to Topical Response D. As described therein, the project would not result in a significant impact related to traffic safety; a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts; and mitigation is required to reduce impacts to road surfaces to a less than significant level.

Response 56.2

The commenter describes concerns related to emergency evacuation.

The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. Also refer to Topical Response D.

Response 56.3

The commenter states that the project would add traffic to the area, and that increased traffic would congest exit routes in the event of an emergency evacuation.

Please refer to Topical Response D for a discussion of impacts on emergency evacuation and emergency access. The project would not result in a significant impact on emergency preparedness within the Subdivision, and would maintain adequate emergency access routes to the project site.

Response 56.4

The commenter states that the project would compromise the Subdivision's private security operations.

Please refer to Topical Response A for a discussion of the project's impacts on security operations. The project would not result in a significant impact on police service within the Subdivision. Regarding the Subdivision's private security operations, an agreement would be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Response 56.5

The commenter states the project would have environmental impacts. The commenter states that the project would disrupt the landscape and impact wildlife, including endangered barn owls.

Regarding impacts to wildlife, please refer to Topical Response G. As stated therein, impacts to wildlife would be mitigated to less than significant by preconstruction surveys and avoidance.

Response 56.6

The commenter states that the project would remove eucalyptus trees that are currently providing ecosystem services for the area, including wind and noise abatement.

Tree removal and impacts to wildlife are discussed in Topical Response G and Section 7.0, *Biological Resources,* of the Draft SEIR. As noted in Topical Response G, impacts to common wildlife species would not be considered significant under CEQA.

Response 56.7

The commenter states that the project would drain stormwater into the Subdivision, increasing flood risks and mudslide risks.

Please refer to Topical Response E. As noted therein, the project includes on-site stormwater control measures designed to achieve zero net increase in the rate of stormwater discharge relative to pre-project conditions. This would reduce the potential for runoff from new development to exceed the capacity of storm drainage facilities and contribute to off-site flood hazards.

Response 56.8

The commenter states that the project would cause noise impacts.

Refer to Topical Response H, which includes a detailed discussion of the potential noise impacts of the project. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 56.9

The commenter states that the project would cause airborne dust impacts.

Suspended particulate matter emissions (including airborne dust during construction) are discussed in Section 6.0, *Air Quality*, of the Draft SEIR. As described therein, construction of the project would expose nearby residences to particulate matter emissions from the use of off-road equipment as well as large diesel-fueled trucks. Mitigation Measures AQ-1, AQ-2, and AQ-3 are required to reduce this impact to a less than significant level. These three measures require, respectively, the inclusion of dust control measures in the project's grading plan, appointment of a site monitor, and maintenance of equipment for low emissions. For a full description of particulate matter emissions and mitigation measures, refer to Section 6.0, *Air Quality*, of the Draft SEIR.

Response 56.10

The commenter states that the project would cause odor impacts from construction activities and meals.

Odor is discussed in Section 6.0, *Air Quality,* of the Draft SEIR, and again in Topical Response C. Odors released outdoors from meal preparation would be intermittent and unlikely to be objectionable to the extent of causing a public nuisance

Response 56.11

The commenter states that the project would have aesthetic impacts due to tree removal.

Please refer to Topical Response F regarding views of the site. As stated therein, impacts to scenic resources and private views would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Regarding impacts to wildlife, please refer to Topical Response G. As stated therein, impacts to wildlife would be mitigated to less than significant by preconstruction surveys and avoidance.

Response 56.12

The commenter states that the project is inconsistent with the site's zoning and applicable land use plans.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 56.13

The commenter states that the project is a non-residential project in a residential area. The commenter states that the project would destroy the nature of the community and impact neighboring home values.

Please refer to Topical Response C. As described therein, property value is not an environmental impact and therefore is not analyzed in the Draft SEIR, and the project would be consistent with the site's zoning and land use requirements.

Received by RMA-Planning
on April 10, 2018.

Letter 57

From: Scott Cooper Date: April 10, 2018

Address: 17703 Riverbend Rd. Salinas, CA. 93908

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us

roygobets@aol.com , Roy Gobets 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Greetings Joe,

I Scott Cooper resident at 17703 riverbend rd Salinas ca 93908 am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. This parcel is zoned medium residential, NOT COMMERICAL, so we should not allow a permit to build commercial business in a residential zone in the middle of a quiet residential area. 57.1

I strongly urge the developer to find alternate venue and access for his proposed facility.

Please respond to the issues I listed above in writing.

Respectfully,

X Scott S Cooper

Letter 57

COMMENTER: Scott Cooper

DATE: April 10, 2018

Response 57.1

The commenter states that the project would cause traffic and safety impacts. The commenter states that the project is not compatible with the site's zoning or surrounding land uses. The commenter urges that the project be relocated.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response C regarding land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classification, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

Letter 58

Received by RMA-Planning
on April 10, 2018.

Sidor, Joe (Joseph) x5262

From: Tim Donlon <tim@mmwestcoast.com>
Sent: Tuesday, April 10, 2018 9:50 AM
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334
Subject: Letter re: Riverview development

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Mr Sidor,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. 58.1

I respectfully urge the developer to find alternate venue and access for his proposed facility.

Please respond to the issues I listed above in writing.

Respectfully,

Best Regards,

Tim Donlon
tim@mmwestcoast.com
M&M West Coast Produce, Inc.
831-998-7372
831-998-8434 fax
831-233-8270 cell

Letter 58

COMMENTER: Tim Donlon

DATE: April 10, 2018

Response 58.1

The commenter states that they are concerned about the project's impacts on traffic, safety, and land use incompatibility. The commenter urges that the project be relocated.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response C regarding land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Refer to Response 57.1, above, for a discussion of an alternative site.

Letter 59

Received by RMA-Planning
on April 11, 2018.

Sidor, Joe (Joseph) x5262

From: jeremiah ruttschow <j_ruttschow@yahoo.com>
Sent: Tuesday, April 10, 2018 8:20 PM
To: Sidor, Joe (Joseph) x5262
Subject: Senior living facility at Las Palmas.

Please consider this email as a voice strongly opposed to building the senior living facility, or any similar construction in the proposed area. The impact this project would have on the totality of this neighborhood is so severely significant to the people who live here as to be incomprehensible to anyone who does not. We have worked very hard to finally purchase a home in this neighborhood, one which backs up to the hills you want to develop. The traffic, noise and aesthetic impacts will be enormous. Thank you for your time. 59.1

Jeremiah and Jennifer Ruttschow
21156 Old Ranch Ct.

Letter 59

COMMENTER: Jeremiah and Jennifer Ruttschow

DATE: April 10, 2018

Response 59.1

The commenters state that they are opposed to the project, due to impacts on traffic, noise, and aesthetics.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Regarding traffic impacts, refer to Topical Response D. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

For a discussion of the project's potential noise impacts, refer to Topical Response H. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Please refer to Topical Response F regarding aesthetic impacts. As stated therein, impacts to scenic resources and private views would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Letter 60

Received by RMA-Planning
on April 12, 2018.

Joseph Sidor, Associate Planner

April 11, 2018

Brandon Swanson, Planning Manager

Monterey County Planning Commission

Dear Planning Commission Leaders,

I have owned my Las Palmas 1 home since June of 1998. I am against the proposed development of Riverview at Las Palmas (PLN#150372) for various important reasons. Although I usually support nursing facilities as part of a healthy community, the location of the proposed project is simply not the best location for the needs of the project's users and our residential neighborhood. 60.1

Traffic will be a serious problem for both groups: the commercial vehicles for the Riverview facility would be impacted by the residential traffic of Las Palmas and vice-a-versa. One entry and exit is simply not sufficient for this area. 60.2

I purchased my Las Palmas home for the desirability of the rural location. I believe that the proposed development is not consistent with the Las Palmas Plan. 60.3

I strongly urge you to abandon this project as a viable choice for our community.

Most sincerely,

Paula Browning

17531 Sugarmill Rd.

Salinas, CA 93908

Letter 60

COMMENTER: Paula Browning

DATE: April 11, 2018

Response 60.1

The commenter states that they are opposed to the project because it is not an appropriate land use for the site.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Please refer to Topical Response C regarding land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 60.2

The commenter states that the project would cause traffic impacts, and that one entry and exit is not sufficient to handle the traffic increase caused by the project.

Please refer to Topical Response D for a discussion of a separate entry for the project. As noted therein, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts. Additionally, the project would not result in a substantial increase in traffic within the Subdivision.

Response 60.3

The commenter states that the project is not consistent with the LPRSP.

Please refer to Topical Response C regarding land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Received by RMA-Planning
on April 12, 2018.

Letter 61

Joseph Sidor, Associate Planner

Brandon Swanson, Planning Manager

Monterey County Planning Commission

April 11, 2018

Dear Sirs,

As a homeowner in Las Palmas 1, I fervently recommend that you relocate the proposed project of Riverview at Las Palmas. Here are my concerns: 61.1

1) The area of Woodridge Ct., Sugarmill Rd., Old Ranch Ct. and Country Park Rd. is essentially a canyon. The proposed site is surrounded by dry vegetation. 61.2
2) The proposed area has limited road access and it would be extremely difficult to evacuate Riverview residents in any disaster (earthquake or fire).
3) Future flooding is also a real concern. The entrance & exit road to the proposed facility could be impacted by flood waters. 61.3

Quite frankly, we need to prevent the possible danger of loss of life by not continuing with this location for the Riverview project. Prevention is the important element for this dangerously unsafe locale. 61.4

Respectfully,

Roy Browning

17531 Sugarmill

Salinas, CA

93908

Letter 61

COMMENTER: Roy Browning

DATE: April 11, 2018

Response 61.1

The commenter states that the project should be relocated, due to a list of concerns.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classifications, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

The commenter's individual concerns are addressed below.

Response 61.2

The commenter states that the project site is a canyon surrounded by dry vegetation and would be difficult to evacuate in the event of a natural disaster.

Please refer to Topical Response B. As stated therein, the proposed site plan has been designed to comply with the County's fuel modification standards (Title 18, Chapter 18.56.090 *Fuel Modification Standards*) to minimize potential wildfire hazards on the project site and vicinity.

The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. Also refer to Topical Response D for additional discussion regarding traffic.

Response 61.3

The commenter states that flooding is a concern, and that the project's entrance road could be flooded.

Please refer to Topical Response E. As noted therein, the project includes on-site stormwater control measures designed to achieve zero net increase in the rate of stormwater discharge relative to pre-project conditions. This would reduce the potential for runoff from new development to exceed the capacity of storm drainage facilities and contribute to off-site flood hazards.

Response 61.4

The commenter states that the project should be prevented to avoid the loss of life that could occur from building on a dangerous site.

Please refer to Topical Response E. As described therein, a geotechnical report was prepared for the project, with recommendations to be included in the project plans. The project would not result in significant impacts related to geologic hazards.

Letter 62

Received by RMA-Planning
on April 11, 2018.

Sidor, Joe (Joseph) x5262

From: anglasala@yahoo.com
Sent: Wednesday, April 11, 2018 8:37 AM
To: Sidor, Joe (Joseph) x5262
Cc: roygobets@aol.com
Subject: RVPL SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Mr Sidor,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. As a mother of a very young family, Las Palmas 1 was the neighborhood we chose to raise our children due to its privacy, low traffic roads, and incredible parks. All of which will be greatly compromised by the proposed project. Further, the scale and scope proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that all Las Palmas residents chose when they located here in the first place. 62.1

I respectfully urge the developer to find alternate venue and access for his proposed facility. 62.2

Please respond to the issues I listed above in writing.

Respectfully,

Angela Caraccioli 21060 Country Park rd.

Letter 62

COMMENTER: Angela Caraccioli

DATE: April 11, 2018

Response 62.1

The commenter states that the project would cause traffic and safety impacts. The commenter states that the project is inconsistent with the surrounding land use.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 62.2

The commenter urges the developer to relocate the project.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classifications, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting.

From:	Terry Bowen
To:	Sidor, Joe (Joseph) x5262
Subject:	Assistive living/Las Palmas
Date:	Friday, April 13, 2018 10:10:41 PM

Letter 63

Mr. Sidor,

My name is Terry Bowen and my mother lives on Riverbend Road in the Las Palmas subdivision. I have great concerns regarding the assistive living complex that is being considered for this area. 63.1

My biggest concern is the traffic that will occur with not only the construction of this facility but with the future residents and associated entities,i.e., employee traffic, laundry and food services, etc.

Will there be a separate entrance for this complex? Traffic light? Separate water/sewage-not tied into Las Palmas? Although I tried to read the pdf that was attached regarding this complex, it was difficult to understand. Layman terms would be helpful. 63.2

Thank you,

Terry Bowen

Letter 63

COMMENTER: Terry Bowen

DATE: April 13, 2018

Response 63.1

The commenter states that they are concerned about the project. The commenter states that the biggest concern is traffic.

Please refer to Topical Response D for a discussion of traffic-related impacts of the proposed project. The commenter's concern is noted and herewith shared with County decision makers for consideration.

Response 63.2

The commenter asks if the project would have a separate entrance or a traffic light. The commenter asks if the project would have water and sewage service separate from the Subdivision.

Please refer to Topical Response D for a discussion of a separate entry for the project. As noted therein, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts.

Refer to Section 10.0, *Water Supply,* of the Draft SEIR, and Response 4.5 for a discussion of water supply, and refer to Response 8.26 for a discussion of wastewater service.

Letter 64

From: Jennifer Lukasik
To: Sidor, Joe (Joseph) x5262
Cc: Holm, Carl P. x5103; Swanson, Brandon xx5334; Onciano, Jacqueline x5193; roygobets@aol.com
Subject: Letter RE: : RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)
Date: Sunday, April 15, 2018 8:40:35 AM

Jennifer M. Lukasik
17506 Sugarmill RD
Salinas, CA 93908
(714)470-3116
Jenner10@msn.com

April 13, 2018
To: Mr. Joseph Sidor, Associate Planner (Sidorj@co.monterey.ca.us), (831) 755-5262

Cc Mr. Carl Holm, Planning Director (holmcp@co.monterey.ca.us),
Cc Mr. Brandon Swanson, Planning Manager (swansonb@co.monterey.ca.us),
Cc Ms. Jacqueline Onciano, Chief of Planning (oncianoj@co.monterey.ca.us)

Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901

RE: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (**PLN#150372**)

Mr. Sidor,

I am resident of Las Palmas 1 and strongly opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372).
As a medical professional for over 35 years, I am supportive of the building of "Senior Living Facilities", Long Term Care and Rehabilitative Centers. Building a non-residential development of this nature *is not* consistent with the residential atmosphere here in Las Palmas 1 community. This type of development will interrupt the quiet, serene neighborhood here. It is surrounded by beautiful hillsides that cater to wildlife, trees and plants. Aesthetics of our hillsides would be compromised by this project. Wildlife would be displaced at a detriment to them, removing them from their natural surroundings.
Excessive traffic, safety and security concerns, noise/light pollution, "overburdening" of current easement agreement is just the beginning why Riverview at Las Palmas is not a "neighborhood fit" in our residential community. Scenic View is also comprised as this project can be seen from Hwy 68, Spreckels Blvd and River Road.

64.1

1-TRAFFIC
A 105 unit non-residential development will create a vast number of traffic concerns. A variety of vehicles will be coming and going on a daily basis (24hrs a day, 7 days a week). Commercial vehicles, delivery trucks, mail (UPS, Fed-Ex), food deliveries, linen supply, medical

64.2

supply, medical waste, pharmaceutical supply, plumbers, electricians, trash service trucks. Not to forget Emergency Vehicles, ambulances (drop off and pick up), Paramedics and Fire trucks, Police, social services, Physicians, Psychiatrists, contracted therapists (physical therapist, speech therapist, occupational therapists).Friends, family visiting patients. Lastly, employee vehicles entering and exiting overlapping shift changes 30 to 60 minutes 3 times a day.

This incessant traffic will overburden the small residential road to access the Parcel Q. Families want to be able to ride their bikes, walk their dogs and have their children play in our neighborhood. We do not want increased risk of congestion of cars which could impact that. Increase traffic raises risk of injury to families out enjoying their day.

At the employee change of shift 3 times a day, our Guard Shack entry way will be backed up onto River Road. The exit onto River Road will also be impacted by people leaving. This causes an increased risk for accidents at the River Road Las Palmas Intersection. There already have been numerous accidents here without the traffic that will be caused by this development.

64.3

There is no way to regulate this additional traffic coming and going 24 hours a day 7 days a week.

Approving the building of this non-residential community here in Las Palmas 1 increases our Safety and Security risk.

2-SAFETY AND SECURITY

64.4

Las Palmas residents have a good sense of feeling safe and secure in our neighborhood. Our main entrance is staffed during the day by a security guard that monitors residents coming and going. We have patrols on our quiet streets at night. Allowing all of the above mentioned vehicles access here, there is no way to ensure residents safety. We would be opening up our families to “unknown” persons going up to this development.

Again, anyone can say they are going to Riverview to our guard but then come into Las Palmas with other intentions.

Our Guard Shack will be overburdened with only one entry with a one lane access. Residents will be inconvenienced being backed up at the Guard shack. This puts our Guard at an extra risk with inpatient and angry drivers all trying to get in at peak times.

There is only one ingress and egress to this development. If there were a major fire blocking this egress…How would emergency vehicles get to this development? How would the patients get to safety and evacuate if this egress were blocked?

There has already been flooding of the fire road behind Country Park Road which damaged owner’s fences and backyards. With the excavation of the trees and the hilltop…what assurances do the residents have that the increased risk of additional water runoff won’t damage their homes??

3-SCENIC VIEW/RIDGELINE

64.5

-

This proposed development site can currently be seen from Hwy 68, River Road and

Spreckels Blvd. It's right above our homes and would definitely be a distraction from our beautiful surroundings.
There is no way the mitigation proposed can hide the scarring that would result from removing 80 mature Eucalyptus trees. To pretend that landscaping would "enhance" the development is unrealistic.
Three story buildings with multiple casitas is not a fit in this quiet rural community.

4-OVER BURDENING OF EASEMENT

Parcel Q, the proposed area for this development, Riverview at Las Palmas: Zoned for "medium density residential", at 2.61 units per acre. The Las Palmas Plan states "this parcel was specifically approved for 8 units total. The Applicant wants to change that by obtaining a "conditional use permit" to build 105 units a "non-residential community". Las Palmas is a planned residential community built in a rural area. This is not consistent with our community or Las Palmas Master Plan.

If this were to be allowed the access easement from Woodbridge Court/ River Run Road would be overburdened.

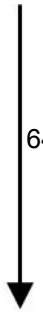
Parcel Q has a grant deed that states:

"A non-exclusive easement for ingress, egress, road and utilities over that portion of River Run Road and Woodbridge Court being a portion of Common Area Parcel C and Las Palmas Road being Common Area Parcel A as shown and designated on that Map entitled Amended Map of Las Palmas Corey House Area/ Unit 1 Tract 1086A filed June 15, 1989, in Volume 16 of Cities and Towns at page 70 in the Office of the County Recorder of Monterey County, California. Said easement shall be appurtenant to Parcel Q as shown designated on the referred Map of Tract 1086A."

The Applicant's proposed development of Riverview at Las Palmas (PLN#150372), a non-residential 105 unit development, is not consistent with the current easement that was put in place for 8 original units. Our roads will be over crowded with traffic and over used.

5-NOISE/LIGHT POLLUTION

Riverview at Las Palmas sits atop a hillside above Country Park and Sugarmill RD. Two 3 story buildings and 26 casitas will compromise our quiet streets and neighborhood. They will have to have a lighted parking lot and walkways. Buildings will have lights, some that stay on all the time and some that can be turned off. This will be seen by all of Las Palmas owners and from River Road, Spreckels Blvd and Hwy 68. It will be a constant disruption to people sleeping as well a distraction to our peaceful dark evenings.



There will be additional noise from all the traffic, or delivery trucks… Patient's that have dementia or Alzheimer's Disease also pose an issue. They can scream and cry uncontrollably for hours from bouts of confusion and depression. There is nothing to block the sound coming into the neighborhood. This can be severely disruptive to someone that has never been exposed to that and also for people that have.

Picture a community that is used to a "quiet privacy", a place where small children can ride their bicycles, walk their dogs, adults can walk/run and just enjoy life safely and securely. If RVLP is built that will change. There is no mention in the SEIR what effect will it have on the homeowners and their families.

Please strongly consider listening to the Homeowner's voices here at Las Palmas 1! Riverview at Las Palmas should be built at a venue where it does not impact closed neighborhoods. There are plenty of open spaces to do so. You will have a lot of unhappy families on your hands. We will stand up for our community and do not want it destroyed!

64.8

Respectfully submitted,

Jennifer M. Lukasik

Letter 64

COMMENTER: Jennifer M. Lukasik

DATE: April 13, 2018

Response 64.1

The commenter states that they are opposed to the project. The commenter lists concerns about land use incompatibility, quality of life, wildlife, aesthetics, safety, noise, and light pollution.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Regarding traffic impacts, refer to Topical Response D. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

Regarding aesthetic and light pollution impacts, please refer to Topical Response F. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

For a discussion of the project's potential noise impacts, refer to Topical Response H. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Please refer to Topical Response C for a discussion of land use compatibility and quality of life. As described therein, the project would be consistent with the site's zoning and land use requirements, and quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

Response 64.2

The commenter states that the project would an increase in traffic through the Subdivision. The commenter states that roads would be overburdened and unsafe.

For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision.

Response 64.3

The commenter states that traffic caused by the project would compromise the Subdivision's private security operations.

Please refer to Topical Response A for a discussion of the project's impacts on security operations. The project would not result in a significant impact on police service within the Subdivision. Regarding the Subdivision's private security operations, an agreement would be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Response 64.4

The commenter states that the project would bring unknown visitors to the Subdivision, which would increase safety risks. The commenter states that the project would worsen the existing flood

and fire risks, and that emergency evacuation from the senior living community would be problematic.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision. Regarding the Subdivision's private security service, refer to Topical Response I, which discusses the project applicant's responsibility to share in the LPHOA's security costs.

Please refer to Topical Response D for a discussion of impacts on emergency evacuation. The project would not result in a significant impact on emergency preparedness within the Subdivision.

For a discussion of wildfire impacts, please refer to Topical Response B, which includes analysis added to the Final SEIR addressing wildfire hazards. Impacts related to wildfire and fire protection would be less than significant.

Please refer to Topical Response D for a discussion of impacts on emergency evacuation. The project would not result in a significant impact on emergency preparedness within the Subdivision.

Please refer to Topical Response E. As noted therein, the project includes on-site stormwater control measures designed to achieve zero net increase in the rate of stormwater discharge relative to pre-project conditions. This would reduce the potential for runoff from new development to exceed the capacity of storm drainage facilities and contribute to off-site flood hazards.

Response 64.5

The commenter states that the project would scar the landscape and distract from the beautiful, rural surroundings. The commenter states that landscaping would not enhance the landscape.

Please refer to Topical Response F regarding scenic resources and landscaping. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Response 64.6

The commenter states that the project would build a large number of residential units in a rural area, and would be inconsistent with the LPRSP. The commenter states that the project would exceed the limit of eight units that the site's easement allows.

Please refer to Topical Response C. As noted therein, the proposed project is not a residential use, and the LPRSP residential unit limitation of 1,031 does not apply to this project.

Response 64.7

The commenter states that the project would cause light pollution. The commenter states that the project would cause noise pollution from traffic and noisy residents.

Please refer to Topical Response F for a discussion of light pollution. As noted therein, mitigation is required to reduce lighting impacts to a less than significant level.

For a discussion of the project's potential traffic and operational noise impacts, refer to Topical Response H. As described therein, traffic and operational noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 64.8

The commenter states that the voices of the Subdivision's homeowners should be considered.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Letter 65

From: Mark Reith (mreith)
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103; roygobets@aol.com; Camille Reith (camillebikle@yahoo.com)
Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)
Date: Friday, April 13, 2018 1:05:37 PM

Hello Mr Sidor,

We are very concerned about the proposed project outlined in PLN150372. Its proposed use of Las Palmas 1 residential roads will pose unacceptable traffic, safety and security problems in our neighborhood. Our home values are based on the desirability of living in a quiet, family-oriented and safe neighborhood. We, and other homeowners depend on this quality in order to maintain our home values. With the addition of the proposed development, the value of a safe, family neighborhood will be significantly impacted due to the development work, traffic load, and security concerns of a large influx of workers, visitors, and guests. Approving this development in our area is not only approving a major financial loss for each homeowner in Las Palmas, but negatively impacting the overall safety for the families raising children in the neighborhood. 65.1

We respectfully urge the developer to find alternate venue and access for his proposed facility. 65.2

Mark and Camille Reith
17712 Riverbend Rd
Salinas, CA 93909

Letter 65

COMMENTER: Mark and Camille Reith

DATE: April 13, 2018

Response 65.1

The commenter states that the project would have impacts on traffic, safety, and neighboring property values.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response C. As described therein, property value is not an environmental impact and therefore is not analyzed in the Draft SEIR.

Response 65.2

The commenter urges that the project be relocated.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

This commenter's preference is herewith shared with the County's decision makers for their consideration.

April 13, 2018

Letter 66

RECEIVED
APR 16 2018
Monterey County RMA

Mr. Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place
Salinas, CA 93901

RE: River View at Las Palmas Assisted Living Senior Facility – Parcel Q

Dear Mr. Sidor,

I am writing with concerns of the proposed project at River View at Las Palmas. I am not opposed to the actual senior facility itself as my own mother is elderly and may soon need to live in a senior housing facility. I am, however, opposed to this project having access to the Las Palmas I entrance on River Road. During construction and thereafter it will create a great deal of traffic. There will be a constant flow of traffic coming in and out of this entrance with construction vehicles, contractors' and carpenters' vehicles, delivery vehicles with supplies during the building and after completion (i.e. food, linens, etc.), emergency vehicles, along with employees and guests of the facility. All of this undo traffic will also create a hazard as vehicles will be backed up onto River Road trying to enter. There has already been one fatality at this entrance let alone other collisions. 66.1

This facility needs to have their own separate entrance. 66.2

Thank you for taking the time to read my concerns about this proposed project.

Joyce Shimamoto
17755 Riverbend Rd.
Salinas, CA 93908

Letter 66

COMMENTER: Joyce Shimamoto

DATE: April 13, 2018

Response 66.1

The commenter states that they are opposed to the project using Las Palmas Road in its access route. The commenter states that this route will result in a constant flow of traffic and will create safety hazards by congesting the entrance from River Road.

Please refer to Topical Response D for a discussion project site access. As noted therein, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts.

Response 66.2

The commenter states that the project should have a separate entrance.

Please refer to Topical Response D for a discussion of a separate entry for the project. As noted therein, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts.

Letter 67

Received by RMA-Planning
on April 16, 2018.

Law Office of C. Denise Benoit

80 GARDEN COURT, SUITE 250
MONTEREY, CALIFORNIA 93940

C. DENISE BENOIT

Certified Specialist, Family Law
The State Bar of California

denise@cdbenoitlaw.com

TELEPHONE (831) 975-5448
FACSIMILE (831) 424-0845

April 15, 2018

Mr. Joseph Sidor
Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place
Salinas, California 93908

Re: RVPL Draft SEIR for proposed development of Riverview at Las Palmas I (Plan #150372)

Dear Mr. Sidor:

I have lived in Las Palmas I now for almost 18 years. I chose this area as my home because I treasured the pastoral setting and the freedom from traffic as well as the relative security of the neighborhood. The Riverview at Las Palmas project threatens all of these.

Traffic

I don't know if you have tried exiting Highway 68 onto River Road/Reservation Road between 5:00-6:00 p.m. on a weekday, but I have, and it is already a dangerous proposition. There have been many a time when the off-ramp is already completely filled with traffic waiting to turn onto River or Reservation Roads and it is backed up onto Hwy. 68. This is not going to improve with a project which will bring in a tremendous amount of additional traffic. While Mr. Shingu has, in my opinion, minimized the impact of the traffic, I believe that it is obvious that it cannot help but make that exit more dangerous, without even considering the traffic which will back up at the light and entrance to Las Palmas on River Road. 67.1

Not only do the 3 shifts of caregivers/workers at the facility need to be taken into consideration, but also the residents of the facility themselves, many of

whom will still be driving while residing there. I speak from some experience, as my father resided at Villa Serra in Salinas (another assisted care facility) for 10 years and there were always residents coming and going from the facility. In addition, there were, and can be expected here if the project is approved, ambulances on an almost daily basis as illnesses, injuries and deaths are more frequently experienced by the elderly. I would also expect a facility of this sort to have large food delivery trucks, linen services, equipment delivery and service vehicles, mail and other delivery services, cable TV and utility workers, hospice care workers, other individually hired caregivers, family members, doctors, nurses and friends.

Not only will this additional traffic be an issue in coming into our secured gate because the amount of space between the turn and our security gate is not large, but it also impacts the very security we sought to protect by hiring a security company. Our security guard regularly turns away persons who have no legitimate reason to be on the property and the daytime burglaries we experienced while we were at work has virtually ceased as a result of the diligence of our security personnel. We will have no ability to determine whether persons passing our security gate are truly visiting/working at the facility, or just saying this to get past our security guard and then vandalizing/burglarizing homes in the neighborhood. As it currently stands, each residence provides advance notice to the guard of anyone they are expecting and identification is required by the guards. 67.2

Neighborhood children play basketball and skate freely in our streets at the present, because it is a safe place. With added traffic, they would not be able to do so due to the frequency of visitors.

<u>Quiet and peaceful enjoyment of country lifestyle</u>

At night, we have been able to enjoy quiet, starlit nights. If this project is approved, not only will we have interference with our security, but the lights from the project will overshadow the views we sought when purchasing our properties. There are approximately 80 eucalyptus trees scheduled to be removed, along with all the wildlife that this project will affect. Our neighborhood is home to many owls and we have supported the Boy Scouts in building boxes to allow them to nest safely nearby. Removal of the trees would affect their homes. We also have bobcats, deer and mountain lions. 67.3

It was not that long ago that a deer which had been killed by a mountain lion was found on one of our back paths. Imagine what would happen if an elderly person with dementia were to wander from the facility.

We pay for the maintenance of our streets and sidewalks. Las Palmas has had to pay for injuries in the past when individuals tripped and fell on our private property. How would the proposed facility keep their residents and their guests from wandering our streets or using our sidewalks so we are not at increased risk of suit? 67.4

Large delivery trucks traveling up the inclined road would cause vibration and noise to the residents below. Some have already experienced disruption of their sleep due to late night work and viewings by Mr. Shingu or his hired personnel. 67.5

Landslide risk

This project is scheduled to be placed on top of a very steep hillside which has already washed away and onto the property of residents backing up to the hillside. It took Mr. Shingu many months before the damage was repaired and the first effort to clear mud away from our drainage system was insufficient and had to be re-done. That took several more months. There is no guarantee that adding significant weight and traffic to the hillside will not increase the risk of damage to residents living below, some of whose homes are mere feet away from the base of the hillside. We would not want a mudslide to damage property or cause a loss of life, as in the Southern California mudslides. 67.6

Security

As I mentioned above, my father resided in Villa Serra for 10 years. I cannot begin to stress the amount of staff turnover for this type of facility. There were multiple occasions of which I was aware when staff were caught stealing from residents and were let go. Unfortunately, while many caregivers are good and honest people, some less honest people are also attracted to this field because the persons they serve are not able to protect themselves. These are not people we want to have access to our homes and neighborhoods, but they will have access if the project is approved. 67.7

Once past the guard gate, anyone claiming to "visit" a resident will have full access to our whole neighborhood and we could not afford to have enough security guards roaming the entire neighborhood 24/7.

I ask that you not approve this project as it is in direct contravention of the general plan at Las Palmas, which would allow for the building of 3 residential units, not a commercial facility. 67.8

Thank you for your time and consideration.

Sincerely,

C. Denise Benoit
17716 Riverbend Rd.
Salinas, Ca. 93908

Cc: Brandon Swanson, Planning Manager
Jaqueline Onciano, Chief of Planning
Carl Holm, Planning Director

Letter 67

COMMENTER: C. Denise Benoit

DATE: April 15, 2018

Response 67.1

The commenter states that the Draft SEIR does not accurately represent the project's traffic impacts, particularly on the SR 68 River Road/Reservation Road exit. The commenter states that the project would increase traffic due to resident trips, ambulance trips, and commercial trips.

Please refer to Topical Response D for additional discussion regarding traffic, including the types of trips that would be generated.

Response 67.2

The commenter states that crime has decreased since the Subdivision hired a security service, but that the project would compromise operations at the security gate. The commenter states that the Subdivision would lose control over identifying who enters the Subdivision, and would also experience safety risks from increased traffic.

Please refer to Topical Response A for a discussion of the project's impacts on security operations. The project would not result in a significant impact on police service within the Subdivision. Regarding the Subdivision's private security operations, an agreement would be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Topical Response A and Topical Response D provide a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 67.3

The commenter states that the project would disrupt the area's environment by adding light pollution, removing trees, and displacing wildlife.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

Regarding impacts to wildlife, please refer to Topical Response G. As stated therein, impacts to wildlife would be mitigated to less than significant by preconstruction surveys and avoidance.

Response 67.4

The commenter states that the Subdivision homeowners pay for maintenance of the Subdivision's private streets and sidewalks. The commenter asks how residents would be restricted from walking on the Subdivision's streets and sidewalks.

Please refer to Topical Response I. As noted therein, a written agreement between the LPHOA and the applicant would be necessary in order to clarify cost-sharing and responsibilities associated with

the streets, drainage facilities, and security operations. Such an agreement is not currently in place. It is outside of the scope of the Draft SEIR to facilitate an access agreement between the applicant and the LPHOA.

Response 67.5

The commenter states that delivery trucks to the project site would cause noise impacts.

For a discussion of the project's potential noise impacts, including traffic/truck noise impacts, refer to Topical Response H. As described therein, traffic noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 67.6

The commenter states that the project site is on top of a steep hillside that is prone to erosion. The commenter states that adding weight and traffic to the project site would increase mudslide risks to the Subdivision.

Please refer to Topical Response E for a discussion of slope stability and landsliding. As noted therein, 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, including slope stability and landslides.

Response 67.7

The commenter states that the employees of the senior living community would increase crime risks in the Subdivision. The commenter states that the Subdivision's security operations would no longer be capable of monitoring visitors to the Subdivision.

Please refer to Topical Response A for a discussion of the project's impacts on security operations. The project would not result in a significant impact on police service within the Subdivision. Regarding the Subdivision's private security operations, an agreement would be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Topical Response A and Topical Response D provide a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 67.8

The commenter states that the project conflicts with the LPRSP.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Letter 68

From: Jayne
To: Sidor, Joe (Joseph) x5262; Holm, Carl P. x5103; Swanson, Brandon xx5334
Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)
Date: Sunday, April 15, 2018 3:28:52 PM

Dear Mr. Sidor, Holm and Swanson,

I am a resident of Las Palmas and strongly oppose the proposed development of Riverview at Las Palmas. This community was chosen by me because it is a quiet, safe and a haven from the Salinas proper area. PLEASE VOTE NO ON THIS. 68.1

I have lived here for nineteen years. The thought of my peaceful neighborhood being overrun by additional traffic from the staff, visitors, food trucks, laundry trucks, physicians, nurses, CNA's and all non medical deliveries not to mention ambulances and fire trucks at all hours of the day and night is a horror. The noise and traffic generated by the construction is very problematic to me. My husband spent time in a nursing/ assisted living place so I have first hand knowledge of the amount of "comings and goings" inherent in this type of place. 68.2

Is the guard at the gate supposed to handle all this extra traffic? Speaking of traffic, it already backs up at the entrance along River Road. I feel security will be compromised by this proposed building. 68.3

It is my understanding that under the Monterey County Plan, the Las Palmas Community was approved and developed as a rural residential neighborhood and that is how I desire it to stay. I see my property value decreasing. If I wanted to live by a assisted living home, I would have purchased my home there. Perhaps this development could be built next to your place of residence. I urge the developer to find another place to build, perhaps closer to a hospital. 68.4

Please respond to these concerns in writing.

Respectfully,

Jayne Carolan
17760 Riverbend Road
Salinas, CA 93908
831-455-9439
Catkeeper3@aol.com

Sent from my iPhone

Letter 68

COMMENTER: Jayne Carolan

DATE: April 15, 2018

Response 68.1

The commenter states that they are opposed to the project.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 68.2

The commenter states that the project would cause traffic and noise impacts.

Topical Response D for a discussion of traffic impacts. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

For a discussion of the project's potential noise impacts, refer to Topical Response H. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 68.3

The commenter states that the project would compromise the Subdivision's private security operations and asks if the Subdivision's entrance gate guard staff would be responsible for monitoring the increased traffic.

Please refer to Topical Response A for a discussion of the project's impacts on security operations. The project would not result in a significant impact on police service within the Subdivision. Regarding the Subdivision's private security operations, an agreement would be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Topical Response A and Topical Response D provide a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks. Response 68.4

The commenter urges that the project be relocated.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classifications, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access. This commenter's preference is herewith shared with the County's decision makers for their consideration.

David Tucker
17535 Sugarmill Road
Salinas, Ca 93908

Date 04/15/2018

Letter 69

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us

roygobets@aol.com , Roy Gobets 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr. Sidor,

I am a home owner in Las Palmas Ranch 1 and am writing this letter in opposition of this proposed project. I have been an HVAC contractor for the last 32 years and understand the need for facilities like these but not in residential communities as this is for all purposes a hospital without operating rooms and does not belong in a zoned residential community. I am fully aware of the noise and light pollution associated with such a project. If it were in the city it would be one thing but out in a rural development with very little night time lighting and minimal noise this facility will stand out like a beacon in the night with it's exterior lighting and constant drone of vehicles, HVAC equipment, Kitchen equipment, generators and building alarms not to mention fire department and ambulance response to the proposed facility at all hours of the night. 69.1

I just bought a home in Las Palmas and was not made aware by owner or real estate agent about the impending Parcel Q project or I would have passed on buying the home. I bought in Las Palmas as it is a quiet, peaceful, safe and secluded neighborhood in a rural setting. The only noise you hear are the Dove in the morning and during the day noise is normal for the type of rural setting. At night there is almost complete silence and no light pollution like in city living. I am sure most of the residents of the 329 homes in the Las Palmas community share my feelings about why we have chosen to live in this private community nestled in the hills. 69.2

My view from the upstairs master bedroom, downstairs main portion of my home and patio is directly of the proposed project site and is only 600 feet from my home. The current view is of the hillside and Eucalyptus trees. The new view if project is allowed would be of every building along the southern edge of the hill and would be silhouetted against the sky and all the trees will be removed. See the following: 69.3

HEIGHT: 18'-3" ABOVE AVERAGE GRADE @ IND. LIVING
27'-9" ABOVE AVERAGE GRADE @ ASSIST. LIVING
41'-3" ABOVE AVERAGE GRADE @ MEMORY CARE

It is going to be hard to hide these structures.

The above being said the Parcel Q project would bring unwanted noise 24 hours a day, 7 days a week. I realize it is being billed as a residential community but with a 3 level memory care, 50,972 square ft facility and 2 level assisted living, 58,539 square foot facility along with 13 duplex casitas for a total of 26 units at 27,993 square foot is not consistent with the single family dwelling, medium density residential development design like Las Palmas. The zoning would have to be changed and a variance given by the county to even accommodate this facility from the properties current zoning. 69.4

According to the developer the 92 base employees would is an estimate and once open would most likely increase due to patient requirements. The constant stream of delivery trucks, garbage service required to support a facility of this size would be very large. The emergency calls for service requested from the fire departments and ambulances to these types of facilities is astoundingly high. So not only will you have food service semi-trucks, garbage trucks, oxygen delivery, medical supply deliveries there will be fire trucks and ambulances. I understand the ability to designate specific hours for service vehicles to enter for deliveries, but fire and ambulance will be showing up at any given hour when the need arises. When a fire truck enters Las Palmas currently due to the canyon shape the exhaust and engine noise carries up the valley and it is very loud. 69.5

If the Traffic is diverted to the proposed new road through the park that does not mitigate noise traveling up the valley. So now we have maybe a dozen cars that come at night we will have hundreds of vehicles a day as employees come and go and residents who are still able to drive leave and enter property. Highway 68 is at LOS f already which states not 1 more vehicle is permitted due to traffic overload. Is the plan to not allow any vehicles from this project to enter onto highway 68 westbound? It seems a lot of plans are based on anticipated traffic projects on highway 68 not actually projects. Las Palmas would be required to hire more security to deal with large influx of vehicles and people to the private community. 69.6

In 2006 when Samuel Persall tried to develop this property with a 15,686 square foot home that included a gym, garage and care takers quarters he was given strict guidelines on exterior lighting, building visibility from the adjoining neighborhoods and roadways. This square footage was far below what is being proposed. See the following for Persall(highlighted areas are important): 69.7

MONTEREY COUNTY ZONING ADMINISTRATOR

Meeting: October 26, 2006 Time: 9:50 AM **Agenda Item No.:**

Project Description: Administrative Permit and Design Approval for the construction of a 9,940 square foot single family dwelling with an attached 1,076 square foot four-car garage, an attached 1,053 square foot caretaker's unit, an attached 3,617 square foot gym and associated grading (350 cubic yards cut and 350 cubic yards fill). The property is located on parcel “Q” in the Las Palmas Subdivision, Salinas (Assessor's Parcel Number 139-211-035-000), south of River Road and west of Las Palmas Road, Toro Area.

Project Location: Parcel "Q" in the Las Palmas Subdivision, Salinas
APN: 139-211-035-000
Planning File Number: PLN060121 **Name:** Samuel and Linda Persall
Plan Area: Toro Area Plan **Flagged and staked:** Yes
Zoning Designation: **:** MDR/2.61-D & O-D: Medium Density Residential, 2.61 units/acre with Design Control, and Open Space with Design Control
CEQA Action: Categorically Exempt per Section 15303 (a)
Department: RMA - Planning Department

RECOMMENDATION:

Staff recommends that the Zoning Administrator approve the Persall Administrative Permit and Design Approval based on the Findings and Evidence **(Exhibit C**) and subject to the recommended Conditions **(Exhibit D)**.

PROJECT OVERVIEW: This project involves the construction of a single family dwelling, with an attached caretaker unit, garage, and gym. With a combined total of 15,686 square feet of structures, the project is larger than existing residential development on other properties in the Las Palmas Subdivision. The 15.67 acre lot is also considerably larger than other residential lots in Las Palmas, which average 6,000 square feet. The project meets all zoning requirements, including lot coverage, height and setbacks. The project is not located on the crest of a hill, and therefore would not result in ridgeline development. The staking for the proposed project is visible behind the existing Eucalyptus grove when viewed from the Highway 68 Scenic Corridor. The parcel is designated in the Toro Area Plan as visually sensitive. Monterey County policies require architectural and landscaping controls and sensitive site design to protect the scenic qualities of area. To conform to County policies, the project has been modified extensively. Design modifications include lowering the building pad for the proposed residence by six feet, lowering the building pad for the proposed gym by ten feet, and using earth tone materials and colors. The project would be screened with multi-level landscaping. Several large landscaped berms would be installed and planted with shrubs native to the Toro area. Large 24" box live oaks, 15 gallon oaks, 5 gallon oaks, and other native trees would be planted behind the berms. Once installed, the proposed landscaping would screen the majority of the project from view from Highway 68, and should completely screen the proposed project from view from Highway 68 within 10 years. The landscaping would be monitored on an on-going basis to ensure its longterm
health and survival. The planted area between the project and River Road would be placed in a scenic easement to ensure permanent screening for the project, permanently protect additional contiguous open space, and potential wildlife habitat. Those portions of the property where the slope exceeds 30%, primarily in the eastern portion of the lot, would also be placed in a
scenic easement. The project, as described and conditioned, is consistent with the Toro Area Plan,
the Las Palmas Specific Plan and all applicable County of Monterey policies and regulations. No unusual circumstances, unresolved issues, or adverse environmental impacts were identified during project review.

2

CEQA Guidelines §15303 (a) categorically exempts the new construction of small structures, including one single family residence and accessory structures in a residential zone. The geotechnical investigation prepared for this project, the site visit by planning staff on May 24,

2006, and review of the project by planning staff did not identify any unusual circumstances that would indicate any potential adverse environmental impacts. An Environmental Impact Report was prepared for the Las Palmas Specific Plan on December 7, 1982. The proposed project complies with all mitigation measure and standards within the EIR. The geotechnical investigation prepared for this project, the site visit by planning staff on May 24, 2006, and review of the project by planning staff did not identify any unusual circumstances that would indicate any potential adverse environmental impacts. No unresolved issues remain.

OTHER AGENCY INVOLVEMENT:

- Salinas Rural Fire Protection District
- Public Works Department
- Environmental Health Division
- Water Resources Agency

The above checked agencies and departments have reviewed this project. Conditions recommended by Water Resources Agency, Salinas Rural Fire Protection District, Environmental Health and the Planning Department have been incorporated into the recommended conditions of approval **(Exhibit D)**.

The project was referred to the Toro Land Use Advisory Committee (LUAC). On August 14, 2006 the Toro LUAC recommended denial of the project on a 5 to 2 vote **(Exhibit E).** The LUAC expressed concerns regarding the size of the proposed project, the effectiveness of the proposed landscape screening, potential problems with drainage, erosion, landslides, fire, lighting, potential ridgeline development, and concerns that the project would be used as an adjunct to the Corey House. See the discussion section for an analysis **(Exhibit B)**.

Note: The decision on this project is appealable to the Planning Commission.

Annie Murphy
(831) 755-5228, murphya@co.monterey.ca.us
September 28, 2006
cc: Zoning Administrator; Salinas Rural Fire Protection District; Public Works Department; Environmental Health Division; Water Resources Agency; Bob Schubert; Annie Murphy; Carol Allen, Linda and Samuel Persall (Owners); Anatoly Ostretsov (Agent); Planning File PLN060121.

Attachments: Exhibit A Project Data Sheet
Exhibit B Discussion
Exhibit C Recommended Findings and Evidence
Exhibit D Recommended Conditions of Approval
Exhibit E LUAC minutes
Exhibit F Public Comments
Exhibit G Site Plan, Elevations, Floor Plans
Exhibit H Proposed scenic easement

This report was reviewed by Bob Schubert, Acting Planning and Building Services Manager
3
4

EXHIBIT B

DISCUSSION
PLN060121/ Persall
October 26, 2006
Proposed Project

The owners of the property, Samuel and Linda Persall, are requesting permits to construct a new two-story 9,940 square foot single-family residence with an attached 590 square foot garage, an attached 1,053 square foot caretaker's unit, an attached 3,617 square foot gym; and associated grading required for constructing the building pad below grade (350 cubic yards cut and 350 cubic yards fill). Monterey County Code (Title 21) requires an Administrative Permit and Design Approval for the caretaker unit, and Design Approval for the residence and gym. A significant area of the parcel would be dedicated as a scenic easement. Due to public controversy, the project was referred to the Zoning Administrator for a public hearing per Title 21.

Site & Setting

The subject parcel is a 15.67 acre lot located in the Las Palmas Subdivision (parcel Q). The parcel is located approximately 100 feet southwest of River Road, and approximately 1/2 mile southeast of the intersection of Highway 68 and River Road. Residential lots within Las Palmas border the property to the east, open space parcels border the southern property boundary, an open space parcel borders the parcel to the north between the parcel and River Road, and open space land borders the western property boundary. There is an existing access road on the property. The parcel is located on a north-facing hillside. The parcel is not located on the crest of a hill. The central portion of the lot where the majority of development would take place is relatively flat. West of the flat area the land slopes upward with 20% to 25% slopes, and slopes steeply downward to the east, with slopes ranging from 30% to 50%. Approximately 65 clusters of Eucalyptus trees occur on the surveyed portions of the property, with the majority of Eucalyptus occurring on the northern and western portions of the property, between the proposed development and River Road and Highway 68. Other than the Eucalyptus and one large Monterey cypress, the vegetation on the parcel consists primarily of non-native annual grasses. The EIR prepared for the Las Palmas Subdivision did not identify any sensitive habitat on the site. The vegetation surrounding the parcel consists primarily of grassland, with native vegetation consisting primarily of a large grove of live oaks and California buckeye to the north and northwest of the parcel.

Toro Land Use Advisory Committee

The Toro LUAC initially considered the project on June 26, 2006. The project was continued to the LUAC hearing on August 14, 2006 when the applicant could be present. The LUAC recommended denial of the project on a 5 to 2 vote at the August 14th hearing. Planning staff recognizes that there is considerable public controversy regarding this project. However, as outlined below, staff has evaluated the LUAC concerns and determined that the project as described and conditioned is consistent with Monterey County policies. Where supported by County policies, the project has been modified or conditioned to respond to LUAC concerns.

1) The size and scale of the proposed project is not proportionate to other homes in Las Palmas.

Staff Response:

The size and scale of the proposed project, with a total of 15,686 square feet of structures, is considerably larger than existing residential development on other lots within Las Palmas. However, the 15.67 acre subject parcel is approximately 113 times larger than the average 6,000 square foot Las Palmas lot. With an overall lot coverage of approximately two percent, the scale of the proposed project is in proportion with the 15.67 acre lot size. Historically, Monterey County has regulated the size of residential projects by limiting overall lot coverage, and evaluating the project for consistency with other County policies. Lot coverage for the proposed project is well below the allowed lot coverage of 25% for Medium Density Residential zoning districts. The project meets all other zoning requirements, including setbacks.

2) Views of the project from the Highway 68 scenic corridor
Staff Response: See the discussion under "Visual Analysis".
3) The effectiveness of the proposed landscape screening
Staff Response:
Once installed, the proposed landscaping would screen the majority of the project from view from Highway 68, and should completely screen the proposed project from view from the Highway 68 corridor within 10 years. As required by condition #6 (Exhibit D), a mix of native oaks and other native trees and shrubs would be planted to provide dense coverage from ground level to ultimately reach a height of 25 feet when viewed from the Highway 68 scenic corridor. The existing eucalyptus would provide additional screening. Several large landscaped berms would be installed and planted with native shrubs. Large 24" box live oaks, as well as smaller 5 gallon and 15 gallon oaks, would be planted between the berms and the proposed project. Planting a variety of trees sizes would allow for the survival of those trees best adapted to site conditions. The landscaping would be monitored on an on-going basis to ensure its long-term health and survival. After a period of five years, replanting would be required for any shrubs or trees that fail to survive or remain healthy. The planted area between the project and River Road and Highway 68 would be placed in a scenic easement to ensure permanent screening for the project, permanently protect additional contiguous open space and potential wildlife habitat.
4) Potential fire danger posed by Eucalyptus trees
Staff Response:
Salinas Rural Fire has determined that the project as conditioned meets all fire requirements. Paul Pilotte with the Salinas Rural Fire Department visited the site on October 4, 2006, and determined that the eucalyptus trees on the property do not present any additional fire hazard.
5) Potential for erosion and landslides related to location of berms adjacent to hillside and placement of trees on berms
Staff Response:
Condition #6 (Exhibit D) requires that the landscape berms be a located a minimum of 20 feet from the hillside, and that berms be planted with shrubs rather than trees to maintain berm stability. Berms must be designed by a civil or geotechnical engineer. Condition #3 requires that all slopes exposed during the course of construction be covered, seeded, or otherwise treated to control erosion. Condition #12 requires a drainage plan prepared by a registered civil engineer or architect addressing on-site and off-site impacts.
6) Lighting
Staff Response:
Condition #7 (Exhibit D) requires that all exterior lighting be downlit amber bulbs, and that the number of lighting fixtures be limited to that required for safety only.
7) Potential ridgeline development
Staff Response:
The hills to the south of the parcel provide a backdrop for the proposed project when viewed from Highway 68. The parcel is located on a north-facing hillside, with a large relatively flat area in the center portion of the parcel where the proposed development would be located. The project is not located on the crest of a hill, and the staking for the proposed project does not silhouette
6
against the sky. The project would not be considered ridgeline development, pursuant to the definition of ridgeline development in Title 21.06.950.
8) Concerns that the project would be used as an adjunct to the Corey House
Staff Response:

The proposed development could not be used as an adjunct to the Corey House, because public events are not an allowed use within Medium Density Residential Zoning Districts under the Monterey County Zoning Ordinance (Title 21, Chapter 21.12). Any public events would be a violation of the Zoning Ordinance. DT Note(noise from public events not allowed how is this different from noise from a commercial 24/7 Facility)

Visual analysis

While traveling on the Highway 68 scenic corridor on the Salinas River Bridge between River Road and Speckles Lane, portions of the staking for the proposed residence are visible through groves of Eucalyptus trees on the property. Portions of the staking for the project are also visible from River Road. The Toro Area Plan Visual Sensitivity Map (Figure 9) indicates that the parcel is located in a visually sensitive area. The hills to the south of the parcel provide a backdrop for the proposed project when viewed from Highway 68. The project is not located on the crest of a hill, and the staking for the proposed project does not silhouette against the sky. The project would not be considered ridgeline development, pursuant to Title 21.66.010.DT Note(The proposed project would be considered ridgeline as it covers the ridge completely and is seen from both sides)

The General Plan, the Toro Area Plan, and the Las Palmas Specific Plan contain policies to protect the scenic quality of areas visible from the Highway 68 scenic corridor and areas that are visually sensitive according to the Toro Area Plan. As outlined below, the project complies with all policies in the General Plan, the Toro Area Plan, and the Las Palmas Specific Plan for reducing visual impacts.

Policy 26.1.6.1 in the Toro Area Plan, and Policy 40.2.1 in the General Plan, require that additional landscape controls be implemented for projects within the Highway 68 Scenic Corridor, and encourage the use of native plants. Within the Las Palmas Specific Plan, Design and Sensitivity Policy I.7 requires informal massing or irregularly spaced trees to screen development. Consistent with these policies, this project will include extensive landscaping using native shrubs and trees to screen the proposed development. Condition #6 (Exhibit D) requires the use of native shrubs and the use of at least 50 native trees consisting primarily of 24" box native live oaks to provide immediate screening. In addition, condition #6 and requires locating shrubs and trees a significant distance from the Eucalyptus to avoid interfering with the plant growth and development. Consistent with Design and Sensitivity Policy I.3.D, the project retains the existing significant trees on the site. Condition #8 requires that a monitoring contract be implemented to ensure the long-term health and success of the existing and planted landscape screening. Condition #8 requires placing the landscaped area within a permanent conservation easement. Condition #8 also requires that slopes on the parcel greater than 30% be placed in a scenic easement, consistent with Policy 26.1.10 in the General Plan. The landscape screening should immediately reduce the visual impacts of the proposed project, and screen the majority of the project from view within the Highway 68 corridor within 10 years, thereby protecting scenic resources.

To regulate development and protect visual resources within the scenic corridor, Policy 26.1.6.1 in

the Toro Area Plan requires that proposed development in areas of visual sensitivity be reviewed critically for building design and siting. Policy 40.2.1 in the General Plan requires sensitive treatment provisions within the scenic corridor, including the use of architectural controls and siting. Within the Las Palmas Specific Plan, Design and Sensitivity Policy I.4 requires natural materials and earth tone colors on exterior surfaces. Consistent with these policies, the project

7

incorporates the use of earth tone colors which mimic the color of the natural surroundings. At the recommendation of planning staff, the building pads for the proposed structures were lowered from 5 to 6 feet to reduce the overall height and mass of the proposed structures. The structures are sited away from the portion of the parcel closest to Highway 68, reducing the visual impact of the proposed development from the scenic corridor.

In addition to being consistent with Monterey County policies regulating development within the scenic corridor, the project is also consistent with the visual policies in the EIR for Las Palmas Ranch Specific Plan. Parcel Q is designated on Figure E of the Las Palmas Ranch Specific Plan for medium density residential development. Because the analysis of visual impacts within the EIR were based on a much higher density of development than would occur with this project, the visual impacts of the proposed project would likely be much less than those anticipated in the EIR. The EIR anticipates unavoidable cumulative visual impacts to the rural character of the Toro area as a result of the Las Palmas Ranch. The EIR states: "Highway 68 is a designated scenic route, and River Road passes through a largely rural and open area; conversion of adjacent undeveloped lands to residential use could significantly alter viewsheds." Mitigations for this unavoidable cumulative impact include providing a 50' wide landscaped setback along River Road, and employing architectural controls. Consistent with these mitigations, the project does not disrupt the screening along River Road and in fact adds considerable additional screening that would be placed into a permanent scenic easement. The project has also gone through extensive design modification to reduce visual impacts. The project as conditioned also complies with the Conservation and Open Space policies in the Las Palmas Specific Plan, including informal massing of trees to screen development, the use of unobtrusive building materials and finishes, prohibiting development on ridgelines, and designating a proportionate amount of open space relative to housing.

CEQA

An Environmental Impact Report was prepared for the Las Palmas Specific Plan on December 7, 1982. The proposed project complies with all mitigation measure and standards within the EIR. CEQA Guidelines §15303 (a) categorically exempts the new construction of small structures, including one single family residence and accessory structures in a residential zone. The geotechnical investigation prepared for this project, the site visit by planning staff on May 24, 2006, and review of the project by planning staff did not identify any unusual circumstances that would indicate any potential adverse environmental impacts. Grading for this project is limited to that required for the construction of the building pad below grade: 350 cubic yards cut and 350 cubic yards fill. The project complies with Monterey County policies regulating development within the scenic corridor. In accordance with Monterey County policies recommending voluntary dedication of land as open space within the scenic corridor and requiring dedication of scenic easement on slopes greater than 30%, the property owners will dedicate a scenic easement on the property to permanently protect open space. No unresolved issues remain.

8

EXHIBIT C
RECOMMENDED FINDINGS AND EVIDENCE

1. **FINDING: CONSISTENCY** – The project, as described in Condition No. 1 and as conditioned, conforms to the policies, requirements, and standards of the Monterey County General Plan, Toro Area Plan, Las Palmas Specific Plan, and the Monterey County Zoning Ordinance (Title 21), which designates this area as appropriate for development.

EVIDENCE: (a) The text, policies, and regulations in the above referenced documents have been evaluated during the course of review of applications. No conflicts were found to exist. No communications were received during the course of review of the project indicating any inconsistencies with the text, policies, and regulations in these documents.
(b) The property is located at Parcel "Q" in the Las Palmas Subdivision, Salinas (Assessor's Parcel Number 139-211-035-000), Toro Area Plan. The parcel is zoned MDR/2.61-D & O-D: Medium Density Residential, 2.61 units/acre with Design Control, and Open Space with Design Control. Development will occur only on the portions of the parcel designated as Medium Density Residential. The subject property complies with all the rules and regulations pertaining to zoning uses and any other applicable provisions of Title 21, and is therefore suitable for the proposed development.
(c) The project planner conducted site inspections on May 12, 2006 and June 19, 2006 to verify that the project on the subject parcel conforms to project plans in file PLN060121.
(d) The application, project plans, and related support materials submitted by the project applicant to the Monterey County RMA - Planning Department for the proposed development found in Project File PLN060121.
2. **FINDING: SITE SUITABILITY –** The site is physically suitable for the use proposed.
EVIDENCE: (a) The project has been reviewed for site suitability by the following departments and agencies: RMA - Planning Department, Salinas Rural Fire Protection District, Public Works, Environmental Health Division, and Water Resources Agency. There has been no indication from these departments/agencies that the site is not suitable for the proposed development. Conditions recommended have been incorporated.
(b) The Geotechnical Report and the Final EIR prepared for the Las Palmas Ranch Specific Plan indicate that there are not physical or environmental constraints that would indicate that the site is not suitable for the use propose. The following reports have been prepared:
- "Final Environmental Impact Report for the Las Palmas Ranch Specific Plan (EIR 80-100), prepared by Grunwald, Crawford and Associates, Hanford, CA, 1982.
- "Geotechnical Soils-Foundation and Geological Hazards Report" prepared by Grice Engineering, Salinas CA, April 2006.

(c)Staff conducted site visits on May 12 and June 19, 2006 to verify that the site is suitable for this use.
(d) Materials in Project File PLN060121.
9
3. **FINDING: CEQA (Exempt): -** The project is categorically exempt from environmental review.
EVIDENCE: (a) California Environmental Quality Act (CEQA) Guidelines Section 15303 (Class 3) categorically exempts new construction of limited new small facilities, such as the construction of a single-family home in a residential area.
(b) The EIR prepared for the Las Palmas Ranch Specific Plan includes

development of the subject parcel in its review. Mitigation measures identified in the EIR for reducing impacts to visual resources and wildlife have been incorporated in the project as designed and conditioned.
(c) No adverse environmental effects were identified during staff review of the development application during site visits on May 12 and June 19, 2006.
(d) See preceding and following findings and supporting evidence.
4. **FINDING: NO VIOLATIONS -** The subject property is in compliance with all rules and regulations pertaining to zoning uses, subdivision, and any other applicable provisions of the County's zoning ordinance. No violations exist on the property. Zoning violation abatement costs, if any, have been paid.
EVIDENCE: (a) Staff reviewed Monterey County RMA - Planning Department and Building Services Department Monterey County records and is not aware of any violations existing on subject property.
5. **FINDING: HEALTH AND SAFETY -** The establishment, maintenance, or operation of the project applied for will not under the circumstances of this particular case be detrimental to the health, safety, peace, morals, comfort, and general welfare of persons residing or working in the neighborhood of such proposed use, or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.
EVIDENCE: (a) Preceding findings and supporting evidence.
6. FINDING: VISUAL SENSITIVITY – The project as described and conditioned is consistent with Policy 26.1.6.1 in the Toro Area Plan, which requires that development in areas near the Highway 68 Scenic Corridor designated as Visually Sensitive on the Toro Visual Sensitivity map will not adversely affect the scenic beauty of the area.
EVIDENCE: The project has been modified to be consistent with the following policies that require additional land use controls to regulate development within the scenic corridor, and in doing so protects the scenic value of the area.
(a) **Landscaping:** Policy 26.1.6.1 in the Toro Area Plan, and Policy 40.2.1 in the General Plan, requires that landscape controls be implemented for projects within the Highway 68 Scenic Corridor, and encourages the use of native plants. Within the Las Palmas Specific Plan, Design and Sensitivity Policy I.7 requires informal massing or irregularly spaced trees to screen development. The project has been conditioned to require the use of native shrubs and the use of 24" box native live oaks to provide immediate screening, and the locating the plants a significant distance from the Eucalyptus to avoid interfering with the plant growth and development. Consistent with Design and Sensitivity Policy I.3.D, the project retains the existing significant trees on the site. Condition #6 10
(Exhibit D) requires that a monitoring contract be implemented to endure the long-term health and success of the existing and additional landscape screening. Condition #8 requires placing the landscaped area within a permanent conservation easement. The landscape screening as outlined in condition #6 should when planted immediately reduce the visual impacts

of the proposed project, and screen the majority of the project from view within the Highway 68 corridor within 10 years, thereby protecting the scenic resources of the site DT Note(the proposed project will never be hid from Hwy 68 as it is to tall and to vast)

(b) **Siting and Design:** To regulate development and protect visual resources within the scenic corridor, Policy 26.1.6.1 in the Toro Area Plan requires evaluating the siting of buildings, and Policy 40.2.3 in the General Plan requires the use of architectural controls and siting. Within the Las Palmas Specific Plan, Design and Sensitivity Policy I.4 requires natural materials and earth tone colors on exterior surfaces. Consistent with these policies, the project incorporates the use of earth tone colors which mimic the color of the natural surroundings. The building pads for the proposed structures were lowered from 5 to 6 feet to reduce the overall height and mass of the proposed structures. The structures are sited away from the portion of the parcel closest to Highway 68, reducing the visual impact of the proposed development from the scenic corridor.

7. FINDING: OPEN SPACE– The project is consistent with policy 40.2.2 in the Monterey County General Plan, which states that where land is designated for development at a density which would diminish scenic quality, the owner shall be encouraged to voluntarily dedicate a scenic easement to protect the scenic corridor.

EVIDENCE: Project condition # 8, Exhibit D requires that a scenic easement shall be conveyed to the County over those portions of the property where the slope exceeds 30 percent, and for the northern portion of the property starting 100 feet from the edge of the gym and extending to the Northern property boundary to protect views from the scenic corridor.

8. FINDING: APPEALABILITY - The decision on this project is appealable to the Planning Commission.

EVIDENCE: Section 21.80.040 B of the Monterey County Zoning Ordinance (Title 21).

11

Planning and Building Inspection Department
Condition Compliance & Mitigation Monitoring and Reporting Program*

***Project Name*:** Persall
File No*:** PLN060121 ***APN: 139-211-035-000
Approval by: Zoning Administrator ***Date:*** October 26, 2006

****Monitoring or Reporting refers to projects with an EIR or adopted Mitigated Negative Declaration per Section 21081.6 of the Public Resources Code.***

Permit Cond. No.
Mitig. No.
Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department Compliance or Monitoring Actions to be performed. Where applicable, a certified

professional is required for action to be accepted.

Responsible Party for Compliance

Timing Verification of Compliance (name/date)

1. **PBD029 - SPECIFIC USES ONLY**

The Administrative Permit (PLN060121) and Design Approval allows for the construction of an attached 1,053 square foot Caretaker's unit, and the Design Approval allows for the construction of a 9,940 square foot single family dwelling with an attached 1,076 square foot four-car garage, an attached 3,617 square foot gym; and associated grading (350 cubic yards cut and 350 cubic yards fill). The property is located on parcel "Q" in the Las Palmas Subdivision, Salinas (Assessor's Parcel Number 139-211-035-000), south of River Road and west of Las Palmas Road, Toro Area. This permit was approved in accordance with County ordinances and land use regulations subject to the following terms and conditions. Neither the uses nor the construction allowed by this permit shall commence unless and until all of the conditions of this permit are met to the satisfaction of the Director of Planning. Any use or construction not in substantial conformance with the terms and conditions of this permit is a violation of County regulations and may result in modification or revocation of this permit and subsequent legal action. No use or construction other than that specified by this permit is allowed unless additional permits are approved by the appropriate authorities. (**RMA – Planning Department)**

Adhere to conditions and uses specified in the permit.

Owner/ Applicant

Ongoing unless otherwise stated

12

Permit Cond. No.

Mitig. No.

Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.

Responsible Party for Compliance	***Timing***	***Verification of Compliance (name/date)***		
2. **PBD025 - NOTICE-PERMIT APPROVAL** The applicant shall record a notice which states: "A permit (Resolution _____) was approved by the Zoning Administrator for Assessor's Parcel Number 139-211-035-000 on October 26, 2006. The permit was granted subject to **20** conditions of approval which run with the land. A copy of the permit is on file with the Monterey County Planning and Building Inspection Department." Proof of recordation of this notice shall be furnished to the Director of Planning and Building Inspection prior to issuance of building permits or commencement of the use. (**RMA – Planning Department)** Proof of recordation of this notice shall be furnished to PBI.	Owner/ Applicant	Prior to Issuance of grading and building permits or start of use.		
3. **PBD011 - EROSION CONTROL PLAN AND SCHEDULE** The approved development shall incorporate the recommendations of the Erosion Control Plan as reviewed by the Soils Conservation Service and the Director of Planning and Building Inspection. All cut and/or fill slopes exposed	1) Evidence of compliance with the Erosion Control Plan shall be submitted to PBI prior to issuance of building and grading permits. Owner/ Applicant	Prior to Issuance of Grading and Building Permits		

during the course of construction be covered, seeded, or otherwise treated to control erosion during the course of construction, subject to the approval of the Director of Planning and Building Inspection. The improvement and grading plans shall include an implementation schedule of measures for the prevention and control of erosion, siltation and dust during and immediately following construction and until erosion control planting becomes established. This program shall be approved by the Director of Planning and Building Inspection. (**RMA – Planning Department)**

2) Evidence of compliance with the Implementation Schedule shall be submitted to PBI during the course of construction until project completion as approved by the Director of PBI.

Owner/ Applicant

Prior to Final Inspection

4. **PBD013(A) - GEOTECHNICAL CERTIFICATION**

Prior to final inspection, the geotechnical consultant shall provide certification that all development has been constructed in accordance with the geotechnical report. (**RMA – Planning**

Provide certification from geotechnical consultant that all development has been constructed in accordance with the geotechnical report.

Owner/ Applicant

Prior to Final Inspection

13

Permit Cond. No.

Mitig. No.

Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.

Responsible Party for Compliance

Timing

Verification of Compliance (name/date)

Department)

5. **PBD014 - GRADING-WINTER RESTRICTION**

No land clearing or grading shall occur on the subject parcel between October 15th and April 15th unless authorized by the Director of Planning and Building Inspection. (**RMA – Planning Department)**

None Owner/ Applicant

October 15th to April 15th

Submit landscape plans and contractor's estimate to PBI for review and approval.

Owner/ Applicant/ Contractor

At least 60 days prior to final inspection or occupancy

6. **PBDSP001- LANDSCAPE PLAN AND MAINTENANCE (SINGLE FAMILY DWELLING ONLY) (NONSTANDARD)**

The site shall be landscaped. At least 60 days prior to occupancy, three (3) copies of a landscaping plan shall be submitted to the Director of Planning and Building Inspection for approval. A landscape plan review fee is required for this project. Fees shall be paid at the time of landscape plan submittal. The landscaping plan shall be in sufficient detail to identify the location, species, and size of the proposed landscaping materials and shall be accompanied by a nursery or contractor's estimate of the cost of installation of the plan. With the exception of landscaping immediately around the house, the landscape shall consist of entirely native species. At least 50 trees shall be planted. At least 75 percent of the trees shall be live oaks, consisting of 50% 24" box, 25% 15 gallon, All landscaped areas and fences shall be continuously maintained by the applicant; all plant material shall be continuously maintained in a litter-free, weed-free, healthy, growing condition.

Owner/ Applicant

Ongoing

14

Permit Cond. No.

Mitig. No.

Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.	*Responsible Party for Compliance*	*Timing*	*Verification of Compliance (name/date)*
2. Obtain a contract with a certified arborist or ecologist to perform monitoring actions listed under 3 below. Provide copy of contract to the Planning Department for approval.	Owner/ Applicant	At least 60 days prior to final inspection or occupancy	
and 25% 5 gallon trees. Ten percent of trees shall be California Buckeye. All plants and trees shall be located outside of the Eucalyptus tree canopies. A total of 5 landscape berms shall be installed, and planted with native shrubs. Berms shall be designed by a civil or geotechnical engineer. No trees shall be planted on the berms. The berms shall be located a minimum of 20 feet from any hillside, and shall not be located under the Eucalyptus canopies. The landscape shall be designed to provide a solid screen between the structures and views from Highway 68. Before occupancy, landscaping shall be either installed or a certificate of deposit or other form of surety made payable to Monterey County for that cost estimate shall be submitted to the Monterey County Planning and Building Inspection Department. All landscaped areas and fences shall be continuously maintained by the applicant; all plant material shall be continuously maintained in a litter-free, weed-free, healthy, growing condition. (**RMA – Planning Department)**			
3. Submit reports to the Director of Planning and Building Inspection for review. Report shall address progress of planted trees. If any of the required trees fail to survive or maintain a healthy condition at the end of five years, the project arborist shall recommend			

additional planting. Any replanting shall start a new 5-year monitoring period for the additional trees.	Owner/ Applicant	Annually during required monitoring period.					
7. **PBD – LIGHTING – EXTERIOR LIGHTING PLAN (NON-STANDARD)** All exterior lighting shall be unobtrusive, down-lit, harmonious with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. Exterior lights shall have recessed lighting	Submit three copies of the lighting plans to RMA – Planning Department for review and approval.	Owner/ Applicant	Prior to Issuance of Grading and/or Building Permits				
Permit Cond. No. Mitig. No.	***Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.***	***Responsible Party for Compliance***	***Timing***	***Verification of Compliance (name/date)***			
15	elements. Exterior lighting shall be limited to that required for safety purposes only. The applicant shall submit 3 copies of an exterior lighting plan which shall indicate the location, type, and wattage of all light fixtures and include catalog sheets for each fixture. The lighting plan shall comply with the requirements of the California Energy Code set for in						

California code of Regulations, Title 24, Part 6. The exterior lighting plan shall be subject to approval by the Director of the RMA - Planning Department, prior to the issuance of building permits**. (RMA - Planning Department)**
The lighting shall be installed and maintained in accordance with approved plans.
Owner/ Applicant
On-going

8. **PBDSP003 – EASEMENT - SCENIC (NON-STANDARD)**
A scenic easement shall be conveyed to the County over those portions of the property where the slope exceeds 30 percent, and for the northern portion of the property as shown on the scenic easement map (Exhibit H). A driveway shall be allowed within the scenic easement. A scenic easement deed shall be submitted to, and approved by, the Director of Planning prior to issuance of grading or building permits**. (RMA - Planning Department)**
Submit scenic easement to PBI for approval.
Owner/ Applicant
Prior to Issuance of Grading and Building Permits

9. **PBD030 - STOP WORK - RESOURCES FOUND**
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 Monterey County Planning and Building Inspection Department 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 project planner and the archaeologist shall immediately visit the site to determine the extent of the resources and to develop proper mitigation
Stop work within 50 meters (165 feet) of uncovered resource and contact the Monterey County Planning and Building Inspection Department and a qualified archaeologist immediately if cultural, archaeological, historical or paleontological resources are uncovered. When contacted, the project planner 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.
Owner/ Applicant/ Archaeologist
Ongoing

16
Permit Cond. No. Mitig. No.
Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.
Responsible Party for Compliance
Timing
Verification of Compliance (name/date)

measures required for the discovery. (**RMA – Planning Department)**

10 **PBD032(B) – TREE AND ROOT PROTECTION**
Trees which are located close to the construction site(s) shall be protected from inadvertent damage from construction equipment by fencing off the canopy driplines and/or critical root zones (whichever is greater) with protective materials, wrapping trunks with protective materials, avoiding fill of any type against the base of the trunks and avoiding an increase in soil depth at the feeding zone or drip-line of the retained trees. Said protection shall be demonstrated prior to issuance of building permits subject to the approval of the Director of Planning and Building Inspection. (**RMA – Planning Department)**
Submit evidence of tree protection to PBI for review and approval. Tree preservation specifications listed in the Forest Management Plan shall be printed on the grading and building permit. Installation of the tree preservation zone and straw bale barricades shall be completed prior to the issuance of grading and/or building permits. Submit evidence of tree protection to PBI for review and approval.
Owner/

Applicant Prior to Issuance of Grading and/or Building Permits	**WATER RESOURCE AGENCY CONDITIONS** **(831) 755-4860**		
	11 **WR1 - DRAINAGE PLAN** The applicant shall provide the Water Resources Agency a drainage plan prepared by a registered civil engineer or architect addressing on-site and off-site impacts. Drainage improvements shall be constructed in accordance with plans approved by the Water Resources Agency. **(Water Resources Agency)**		
Owner/ Applicant/ Engineer Prior to issuance of any grading or building permits	Submit 3 copies of the engineered drainage plan to the Water Resources Agency for review and approval.		
	12 **WR40 - WATER CONSERVATION MEASURES** The applicant shall comply with Ordinance No. 3932, or as subsequently amended, of the Monterey County Water Resources Agency pertaining to mandatory water conservation regulations. The regulations for new construction require, but are not limited to: a. All toilets shall be ultra-low flush toilets with a maximum tank size or flush capacity of 1.6 gallons, all shower heads shall have a maximum flow capacity of 2.5		
Owner/ Applicant Prior to final building inspection/ occupancy	Compliance to be verified by building inspector at final inspection.		
17			
Permit Cond. No.			

Mitig. No.	*Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.*	*Responsible Party for Compliance*	*Timing*	*Verification of Compliance (name/date)*
	gallons per minute, and all hot water faucets that have more than ten feet of pipe between the faucet and the hot water heater serving such faucet shall be equipped with a hot water recirculation system. b. Landscape plans shall apply xeriscape principles, including such techniques and materials as native or low water use plants and low precipitation sprinkler heads, bubblers, drip irrigation systems and timing devices. **(Water Resources Agency)**			
	FIRE AGENCY CONDITIONS **Salinas Rural Fire Protection District: (831) 455-1828**			
	Applicant shall incorporate specification into design and enumerate as “Fire Dept. Notes” on plans.	Applicant or owner	Prior to issuance of grading and/or building permit.	
13	**FIRE007 - DRIVEWAYS** Driveways shall not be less than 12 feet wide unobstructed, with an unobstructed vertical clearance of not less than 15 feet. The grade for all driveways shall not exceed 15 percent. Where the grade exceeds 8 percent, a minimum structural roadway surface of 0.17 feet of asphaltic concrete on 0.34 feet of aggregate base shall be required. The driveway surface shall be capable of supporting the imposed load of fire apparatus (22 tons), and be accessible by conventional-drive vehicles, including sedans. For driveways with turns 90 degrees and less, the minimum horizontal inside radius of curvature shall be 25 feet. For driveways with turns greater than 90 degrees, the minimum horizontal inside radius curvature shall be 28 feet. For all			

driveway turns, an additional surface of 4 feet shall be added. All driveways exceeding 150 feet in length, but less than 800 feet in length, shall provide a turnout near the midpoint of the driveway. Where the driveway exceeds 800 feet, turnouts shall be provided at no greater than 400-foot intervals. Turnouts shall be a minimum of 12 feet

Applicant shall schedule fire dept. clearance inspection

Applicant or owner

Prior to final building inspection.

18

Permit Cond. No. Mitig. No.

Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.

Responsible Party for Compliance

Timing Verification of Compliance (name/date)

wide and 30 feet long with a minimum of 25-foot taper at both ends. Turnarounds shall be required on driveways in excess of 150 feet of surface length and shall long with a minimum 25-foot taper at both ends. Turnarounds shall be required on driveways in excess of 150 feet of surface length and shall be located within 50 feet of the primary building. The minimum turning radius for a turnaround shall be 40 feet from the center line of the driveway. If a hammerhead/T is used, the top of the "T" shall be a minimum of 60 feet in length. (**Salinas Rural Fire District**)

Applicant shall incorporate specification into design and enumerate as "Fire Dept. Notes" on plans.

Applicant or owner

Prior to issuance of grading and/or

building permit.					
14 **FIRE008 - GATES** All gates providing access from a road to a driveway shall be located at least 30 feet from the roadway and shall open to allow a vehicle to stop without obstructing traffic on the road. Gate entrances shall be at least the width of the traffic lane but in no case less than 12 feet wide. Where a one-way road with a single traffic lane provides access to a gated entrance, a 40-foot turning radius shall be used. Where gates are to be locked, the installation of a key box or other acceptable means for immediate access by emergency equipment may be required. . (**Salinas Rural Fire District**)	Applicant shall schedule fire dept. clearance inspection	Applicant or owner	Prior to final building inspection.		
15 **FIRE011 - ADDRESSES FOR BUILDINGS** All buildings shall be issued an address in accordance with Monterey County Ordinance No. 1241. Each occupancy, except accessory buildings, shall have its own permanently posted address. When multiple occupancies exist within a single building, each individual occupancy shall be separately identified by its own address. Letters, numbers	Applicant shall incorporate specification into design and enumerate as “Fire Dept. Notes” on plans.	Applicant or owner	Prior to issuance of building permit.		
19					
Permit Cond. No.	***Mitig. No.***	***Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.***	***Responsible Party for***		

Compliance Timing	***Verification of Compliance (name/date)***		
Applicant shall schedule fire dept. clearance inspection	Applicant or owner	Prior to final building inspection	
and symbols for addresses shall be a minimum of 4-inch height, 1/2-inch stroke, contrasting with the background color of the sign, and shall be Arabic. The sign and numbers shall be reflective and made of a noncombustible material. Address signs shall be placed at each driveway entrance and at each driveway split. Address signs shall be and visible from both directions of travel along the road. In all cases, the address shall be posted at the beginning of construction and shall be maintained thereafter. Address signs along one-way roads shall be visible from both directions of travel. Where multiple addresses are required at a single driveway, they shall be mounted on a single sign. Where a roadway provides access solely to a single commercial occupancy, the address sign shall be placed at the nearest road intersection providing access to that site. Permanent address numbers shall be posted prior to requesting final clearance. (**Salinas Rural Fire District**)			
Applicant shall schedule fire dept. clearance inspection	Applicant or owner	Prior to final building inspection.	
Applicant shall incorporate specification into design and enumerate as “Fire Dept. Notes” on plans.	Applicant or owner	Prior to issuance of grading and/or building permit.	

16 **FIRE016 - SETBACKS**

All parcels 1 acre and larger shall provide a minimum 30-foot setback for new buildings and accessory buildings from all property lines and/or the center of the road. For parcels less than 1 acre, alternate fuel modification standards or other requirements may be imposed by the local fire jurisdiction to provide the same practical effect. . (**Salinas Rural Fire District**)
Applicant shall schedule fire dept. clearance inspection.
Applicant or owner
Prior to final building inspection
20
Permit Cond. No.
Mitig. No.
Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.
Responsible Party for Compliance
Timing
Verification of Compliance (name/date)
17 **FIRE017 - DISPOSAL OF VEGETATION AND FUELS**
Disposal, including chipping, burying, or removal to a landfill site approved by the local jurisdiction, of vegetation and debris caused by site development and construction, road and driveway construction, and fuel modification shall be completed prior to final clearance of the related permit. . (**Salinas Rural Fire District**)
Applicant shall schedule fire dept. clearance inspection.
Applicant or owner
Prior to final building inspection
Applicant shall incorporate specification into design and enumerate as “Fire Dept.

Notes" on plans.
Applicant or owner
Prior to issuance of grading and/or building permit.
Applicant shall schedule fire dept. clearance inspection.
Applicant or owner
Prior to final building inspection

18 **FIRE019 - DEFENSIBLE SPACE REQUIREMENTS - (STANDARD)**
Remove combustible vegetation from within a minimum of 30 feet of structures. Limb trees 6 feet up from ground. Remove limbs within 10 feet of chimneys. Additional and/or alternate fire protection or firebreaks approved by the fire authority may be required to provide reasonable fire safety. Environmentally sensitive areas may require alternative fire protection, to be determined by Reviewing Authority and the Director of Planning and Building Inspection. (**Salinas Rural Fire District**)
Applicant shall schedule fire dept. clearance inspection.
Applicant or owner
Prior to final building inspection
Applicant shall enumerate as "Fire Dept. Notes" on plans.
Applicant or owner
Prior to issuance of building permit.

19 **FIRE024 - FIRE ALARM SYSTEM - (SINGLE FAMILY DWELLING)**
The residence shall be fully protected with an approved household fire warning system as defined by NFPA Standard 72. Plans and specifications for the household fire warning system shall be submitted by a California licensed C-10 contractor and approved prior to installation.

Permit Cond. No.	*Mitig. No.*	*Conditions of Approval and/or Mitigation Measures and Responsible Land Use Department Compliance or Monitoring Actions to be performed. Where applicable, a certified professional is required for action to be accepted.*	*Responsible Party for Compliance*	*Timing*	*Verification of Compliance (name/date)*
		Applicant shall submit fire alarm plans and obtain approval.	Applicant or owner	Prior to rough sprinkler or framing inspection	
21		Household fire warning systems installed in lieu of singlestation smoke alarms required by the Uniform Building Code shall be required to be placarded as permanent building equipment. (**Salinas Rural Fire District**)			
		Applicant shall schedule fire alarm system acceptance test.	Applicant or owner	Prior to final building inspection	
		Applicant shall enumerate as “Fire Dept. Notes” on plans.	Applicant or owner	Prior to issuance of building permit.	
		Applicant shall schedule fire dept. rough sprinkler inspection	Applicant or owner		

Prior to framing inspection

Applicant shall schedule fire dept. final sprinkler inspection

Applicant or owner

Prior to final building inspection

Applicant shall schedule fire dept. clearance inspection

Applicant or owner

Prior to final building inspection

20 **FIRE021 - FIRE PROTECTION EQUIPMENT & SYSTEMS - FIRE SPRINKLER SYSTEM (STANDARD)** The building(s) and attached garage(s) shall be fully protected with automatic fire sprinkler system(s). Installation shall be in accordance with the applicable NFPA standard. A minimum of four (4) sets of plans for fire sprinkler systems must be submitted by a California licensed C-16 contractor and approved prior to installation. This requirement is not intended to delay issuance of a building permit. A rough sprinkler inspection must be scheduled by the installing contractor and completed prior to requesting a framing inspection. **(Salinas Rural Fire District)**

Applicant shall schedule fire alarm system acceptance test.

Applicant or owner

Prior to final building inspection

The requirements were low amber lighting for Persall and that is not what this large facility will have as it will be lit from dawn to dusk including interior building lighting visible through every exterior window. Exterior building lighting, roadway lighting, Casitas exterior and interior lighting. Persall was going to have to completely shroud his project from being seen from highway 68 and surrounding neighbors.

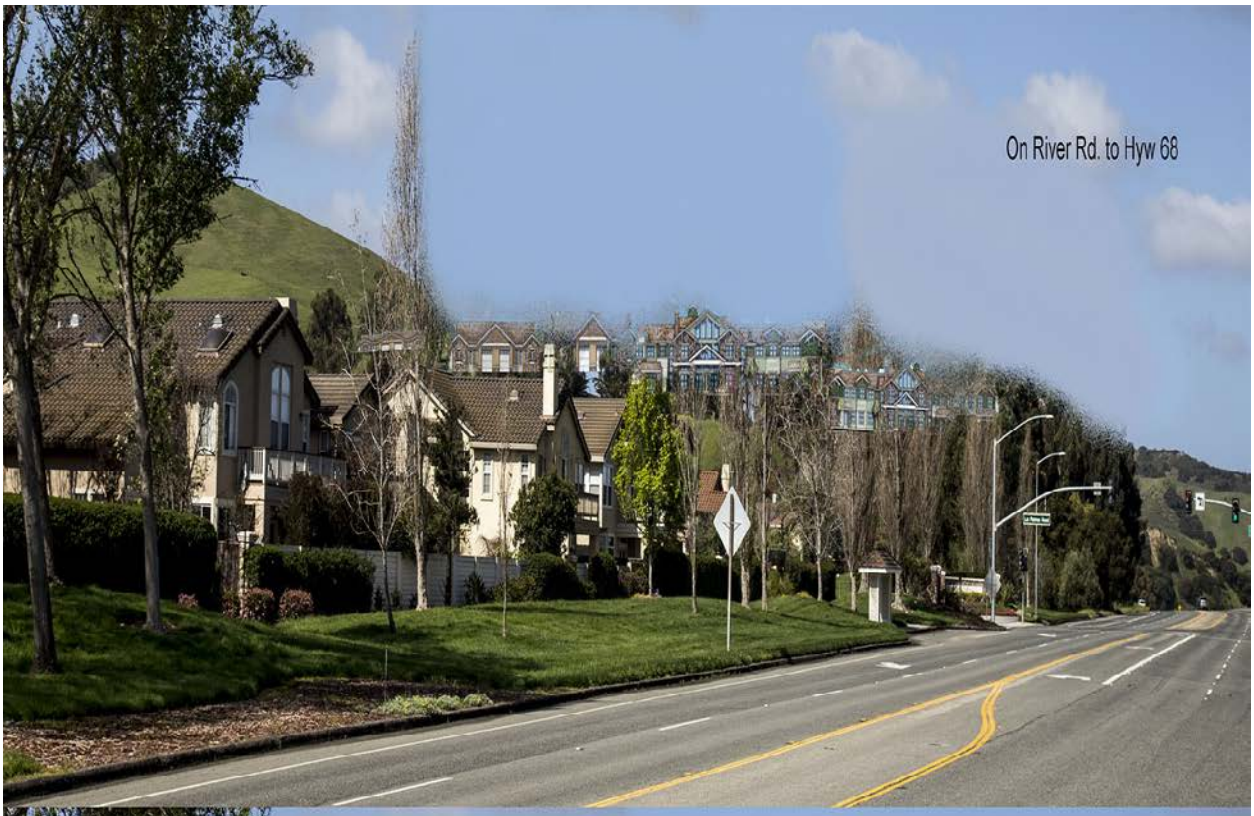
Impact on Scenic View and Environment

The proposed project would be within the existing view shed of public areas, including from areas that offer views of scenic vistas and from viewpoints on designated and proposed scenic roadways (State Route 68, River Road and Reservation Road). The proposed project would also alter the existing, natural visual character of the project site. Although the LPRSP FEIR concluded that visual impacts on Highway 68 would be less than significant with full River View Draft EIR Page 2 buildout of the specific plan area, including the project site, potential visual impacts of the proposed project is considered a significant adverse environmental impact....” (p. 5-30) Below are simulated images produced by a graphic designer (Highway 68 E or W view)

69.8

From 68 (E or W) into River road to LasPalmas

Hyw 68 drom or to Salinas (view From the bidge)


On River Rd. to Hyw 68

From "Sandy Ridge Trail" the top of Fort Ord Public Lands

Let us call this project what it is “Visually obtrusive and hard to hide” no matter how much landscape to throw at it.

Violation of Monterey County Codes

69.9

• L.U.-1.4: Growth areas shall be designated only where an adequate level of services and facilities such as water, sewerage, fire and police protection, transportation, and schools exist or can be assured concurrent with growth and development.

• L.U.-1.5: Land uses shall be designated to achieve compatibility with adjacent uses.

• L.U.-1.11: Development proposals shall be consistent with the General Plan Land Use Map designation of the subject property and the policies of this plan.

• LU-2.19 The County shall refer amendments to the General Plan and zoning changes that would result in the creation of new residential, industrial, or commercial areas to the nearest cities for review and comment.

• L.U.-2.23: Medium Density Residential (MDR): Medium Density Residential areas are appropriate for a range of residential uses (1-5 units/acre) and housing types, recreational, public and quasi-public, and other uses that are incidental and subordinate to the residential use and character of the area. The extent of use of land for this designation shall be limited to building coverage of 35% of the subject property.

• OS-1.2: Development in designated visually sensitive areas shall be subordinate to the natural features of the area.

• OS-1.3: To preserve the County's scenic qualities, ridgeline development shall not be allowed.

• T-1.6: Existing legal lots of record located in the critical viewshed may transfer density from the acreage within the critical viewshed to other contiguous portions of land under the same ownership, provided the resulting development meets all other Toro Area and General Plan policies.

• T-3.1: Within areas designated as “visually sensitive” on the Toro Scenic Highway Corridors and Visual Sensitivity Map, landscaping or new development may be permitted if the development is located and designed (building design, exterior lighting, and siting) in such a manner that will enhance the scenic value of the area.

Traffic and Public Safety

Another concern regarding this project is traffic and public safety. There is only one main entrance in and out of the community at Las Palmas Road. Las Palmas Road is narrow with blind corners, with very little room on the shoulders. Many residents and their children walk, run, play or bike on these roads at all times of day. River Road is already a very busy road due to traffic from other neighborhoods further down the road, Buena Vista Middle School, commercial vehicles and farming equipment. 69.10

Furthermore, the intersection of Highway 68 and Reservation Road has become a bottleneck after the addition of homes in East Garrison, Marina, and more is to come. It is important to note that the last complete traffic study for the area was conducted in the 1980s. The current traffic report prepared by Keith Higgins doesn't fully analyze the project or major arterials surrounding the community. Traffic volumes and trip generation ratio is always coming or going to Highway 68 which has been determined to currently operate at LOS F. The projected increase in trip generation from this project would exacerbate existing conditions. 69.11

The application proposed a mitigation measure as a staggered schedule to avoid peak morning and afternoon hours. However, the proposed schedule and shifts for the project and 92 employees should not be taken in full consideration since it cannot be enforced one way or another and once facility is built will change according to the needs of the facility.

Traffic

The increased traffic with the proposed facility will be a danger for the residents and a concern for public safety. It is already difficult to keep the cars moving through the front gate during peak hours. With a projected increase of 400 trips a day due to the facility, further traffic congestion at the entrance of our community will occur. This entrance has historically seen serious and deadly accidents. Furthermore, in the event of an emergency or a natural disaster, evacuating both residents of Las Palmas 1 and the residents of the facility would be chaotic and quite an undertaking due to the inherent traffic congestion in conjunction with emergency vehicles that will be trying to get in and out of the area.

Commercial Kitchen

The proposed facility will have a commercial kitchen providing around 600 meals or more daily. Given that the residences of Las Palmas 1 are below the proposed facility, and coupled with the breezy conditions the area experiences, the smells from the facility's kitchen will easily travel to the homes. This will impact those homes which enjoy the fresh air by leaving windows and patio doors open 69.12

Project Comparison

The proposed project will have the capacity of housing 142 residents with 142 beds as part of a senior care assisted living community. If we look at either the Natividad Medical Center or the Salinas Valley Memorial Hospital, which can accommodate 137 beds and 225 beds, respectively, we can see that this senior care assisted living with a memory care facility project in the grand scheme of things is extremely large. Even though the hospitals provide medical services that this facility will not, the proposed 3-story memory care facility is a medical care facility. Doctors, nurses and caregivers will be a major part of the staff thereby generating a significant unavoidable impact on public services including water, traffic and emergency services. 69.13

25%-30% Population Increase

In Las Palmas, there are 329 homes with an estimated 1,000 residents. The proposed project will add an additional 142 residents, 92 employees, and vendors and visitors, which will add up to approximately 300 additional people to the community. This is an additional 25-30% of our total population in this very small residential community. This would be equivalent to adding 40,000 new residents to the city of Salinas without taking into consideration traffic, police, fire, disaster preparation, and infrastructure. 69.14

Water Supply Quality and Quantity

The proposed project will negatively affect the demand on the groundwater basin and consequently affect groundwater availability for existing and approved communities. Based on the projected population increase of 25-30%, it can be determined that water consumption in Las Palmas 1 will have more than a 10% increase. This increase in water consumption will further impact the quality of water in the entire basin. Further, the Public Utilities Commission (PUC) states that a 10% increase in production of an existing system requires the production of a Water Supply Assessment (WSA). A Water Supply Assessment (WSA) has not been prepared for the proposed facility which is required under SB 610 and California Water Code section 10910. 69.15

A hydrogeologic report is needed to determine the viability of a long-term water supply of suitable quality for the proposed project. This should be an evaluation of the site-specific water supply. The location of this project is within Zone 2C. According to provided reports from Brown & Caldwell's State of the Salinas River Groundwater Basin report, Zone 2C is out of hydrologic balance, meaning that there is an unbalanced ratio of salt water to fresh water in the basin. Due to the already high usage of fresh water from this basin, the level of salt water intrusion into the fresh water is high, which has already reduced the overall quality of our water. Additionally, the basin is in severe overdraft and seawater intrusion is threatening the quality of water extracted from the aquifers. This is a significant and unavoidable environmental impact.

We feel that the applicant is relying on the Can and Will Serve letter from Cal Water. A Can and Will serve letter does not guarantee service. A long-term water supply of suitable quantity and quality must be proven. The water supplier must determine whether these supplies are acceptable as to quality, quantity and reliability. The State Water Code requires that the County shall

determine, based on the entire record, whether projected water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses.

The Salinas Valley Ground Basin is in an overdraft condition. The California Department of Water Resources (DWR) has designated the 180/400 Foot Aquifer Sub basin as Critically Overdrafted Basin. The Sustainable Groundwater Management Act (SGMA) requires that a Groundwater Sustainability Agency (GSA) be formed to manage the Salinas Valley Groundwater Basin by June 2017, and that the GSA must file a Groundwater Sustainability Plan with DWR by January 2020.

1 Is there sufficient hydrological evidence of acceptable water quality and quantity (sustained yield) to serve the proposed project?

2 Can the new development be served by an identifiable, available, and long-term water supply?

3 Will the proposed development result in an individual and cumulative impact to the aquifer's long-term safe yield level, seawater intrusion and long-term maintenance of local priority agricultural water supplies?

Until these questions are answered, there is no way to determine if there is sufficient water to serve this project.

Public Services

Fire

Due to an estimated 400+ trips directly and indirectly on Highway 68, the response time will be delayed even further from the Toro or Laureles Station located at State Route (SR) 68 . Further analysis needs to fully study the significant impacts to fire/medical services. Response time is a combination of travel time and get-away time (the time it takes the engine to leave the station once an alarm is received). 69.16

Does the Toro Station maintain a population to staff ratio standard required? Do these stations have adequate staffing to provide adequate emergency response to fires, medical incidents, rescues, vehicle accidents, hazardous materials incidents, disasters (floods, earthquakes, etc.)? Is the station equipped with ladder trucks required for 3-story high density structure?

For emergency medical services, do these stations have engines that are equipped with a full complement of first responder medical supplies including CPR equipment, semi-automatic defibrillators and rescue equipment such as Jaws of Life?

Draw down of fire/rescue resources from the MCRFD to augment and provide an adequate level of service to back-fill this project will take away critical fire and life safety services to the existing regional area taxpayers. Reflex time (time it takes from the initial 911 citizen call to on-scene arrival and set-up) is a significant issue to provide adequate fire and life safety services from the MCRFD with no fiscal or financial off sets.

Medical services which are provided for the existing population will be adversely impacted with the spike in population. The proposed 142 senior assisted care facilities complex with 250 residents counting the employees (quarter of the population of this neighborhood), will have a significant impact on fire protection and/or medical services. Therefore, we feel the EIR is deficient. 69.17

Police

The Monterey County Sheriff's Office (MCSO) services the project area and is located within Beat 4. Currently, there is one and a maximum of two deputies per shift covering the Beat 4 area. The increased caseload and additional patrol area associated with the project will negatively affect the MCSO's response times. 69.18

The MCSO has established a target ratio of one deputy per 1,000 persons. However, industry standards for law enforcements services with this type of facility usually require additional police officer staffing in the 2 staff per 1,000 population ratio. To meet response times and maintain a service standard of one deputy per 1,000 persons, additional deputies will be needed to serve the current population.

Noise Pollution

The proposed 3-story memory care facility, the 2-story senior care assisted living, and the 13 casitas are considered commercial due to their application, and per California Building and Fire Codes they will most likely be classified as Type R2.1. 69.19

R2.1 Explanation

R-2.1 Facilities housing clients on a 24-hour basis in a supervised environment that provides personal care services. May contain more than six non-ambulatory and/or bedridden clients, including,

Assisted living such as:

Residential care facilities

Residential care facilities for the elderly (RCFE's)

Adult residential facilities

Congregate living health facilities

Group homes

Residential facilities for the chronically ill

Congregate living health facilities for the terminally ill

For such a building classification (R2.1), the following are the fire alarm requirements:

1 A manual fire alarm system monitored for fire dispatch 24x7 (entire facility)

2 An automatic fire alarm system (smoke and heat detectors, with full coverage), including all sleeping rooms and all common public areas monitored for fire dispatch 24x7 (memory care facility)

3 Automatic smoke detectors in all corridors, hallways and public areas monitored for fire dispatch 24x7 (2-story senior care assisted living)

4 Single station smoke detectors (120 volts AC powered) with battery backups (in the casitas and the sleeping rooms in the 2-story senior care assisted living)

5 Single station smoke detectors with battery backup (all sleeping rooms except memory care building)

6 Notification appliances (horns, strobes, horn strobes combinations or chimes); the required sound level for notification appliances are 70 decibels "at the pillow" in each sleeping room; there is also a required decibel level for all other notification appliances which is 15% above the listed ambient level for all public areas (entire facility)

7 Delayed egress doors with local alarms connected (memory care facility facility)

All of the above minimum requirements must be complied with without compromises or variances to comply with California Fire Code and NFPA 72 National Fire Protection Association and must be cleared with the Local Fire Department before State licensing would allow the occupancy of such facility. The proposed 3-story memory care facility and the 2-story senior living facility will have 150 or more automatic smoke detectors as part of an automatic fire alarm system. If any detector in a building is activated, it will automatically trigger the fire alarm system in the entire building for evacuation, and all the notification devices (horns, strobes, and or chimes) will be sounding until the fire department arrives. Every fire alarm signal must be verified by the fire department, which means a fire engine and will be dispatched to the location. Such noise levels will be easily heard by Las Palmas 1 residents. For example, Chateau Coralini located in Las Palmas 1 has an automatic fire alarm system that has gone off several times, and noise has traveled throughout Parkside. Chateau Coralini is a small vacant building in comparison with what is currently being proposed.

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Delayed egress door systems (memory care facility)

Similarly, per code, the proposed facility will be equipped with delayed egress door alarms. This type of automatic door release system prevents people from being trapped inside a building. If a resident or employee rests on such a door for more than 5 seconds, an alarm will sound, and the door will open. A staff member will have to manually turn off the system with a key. Again, this is a loud and noisy alarm that we, the residents of Las Palmas 1, will be subjected to. 69.20

Emergency Power Generator

Should it be required, the proposed 3-story memory care facility will also have a diesel or gas generator as a means of power backup. These generators normally self-start twice a week for about 30 minutes each time. This also is a source of noise pollution. And depending on where the generator is installed, the noise will travel and be heard by the residents of Las Palmas 1. 69.21

With all the fire alarm detection, evacuation, and all other alarm devices that this facility will require and or will have, the probability of multiple alarms sounding daily is extremely high. Most facilities with these types of systems do experience these alarms all the time. The noise level that these systems will generate is high, not to mention the noise from the emergency vehicles which will be dispatched when alarms or emergency are detected.

Other systems that will impact the noise level are:

1 Security local alarms for all windows or screens (memory care facility)

2 Nurse Call Systems or emergency pull cords (entire facility)

3 Paging and alert systems

4 HVAC systems

5 Commercial kitchen with exhaust and makeup air system as part of a commercial kitchen hood system

6 Vehicles: service trucks and delivery trucks with built-in refrigeration

All the above-mentioned will greatly impact the daily lives of the residents of Las Palmas 1. We are greatly concerned that studies determining the noise impact of such a facility on our residential area have not been conducted and shared with the residents. This should have been the first step. I, like many others, moved to Las Palmas 1 due to the location, safety, and the peaceful and quiet environment that this community has to offer.

Lighting Pollution

For a project of this magnitude, minimum codes and standards must be met for safety and visibility. Light emanating from the buildings and casitas will radiate to the homes down the hill from the facility. Even with shades drawn, light will still be an issue. In addition, the proposed parking spaces will directly deliver headlights into a majority of residents' bedrooms which typically face the hills. 69.22

Lighting at nighttime from inside the facility will also be intrusive for those properties in close proximity to the proposed project. Since this facility is a 24-hour operation, all public areas of the two suggested multi-level buildings will require lights to be on at any given time for the safety of the residents and staff.

For any clarification on the points mentioned above, we would strongly urge you to consult with Salinas Rural Fire since they are the AHJ (Authority Having Jurisdiction) for the area, and they can confirm the accuracy of what has been stated. Note that any type of fire protection is always a deferral permit which means the County does not approve the fire systems permit, the Fire Department does. 69.23

I have read the biological resources report and there are several species native to our area that are noted. The same mitigation answer for every species is "if species is found 15 days prior to start of project it will be relocated. Is this standard practice and how do we know it will survive once relocated to a new area? 69.24

We do not believe that development as a means for profit should negatively impact the quality of life for 1000 people directly and thousands more indirectly. This project, if approved, will inevitably reduce the value of the properties located in Las Palmas 1, which in turn will lower the amount of property taxes that the county will receive. We believe that the Draft Subsequent EIR 69.25

According to the project description and the applicant's statement, the applicant agrees and states that the facility is not for residential use and is asking the County to amend its Specific Plan. If the County amends its plan for Parcel Q, the County will be setting precedent for future projects within the County. This constitutes spot zoning.

I believe that the use of the land should remain as was originally intended and zoned for by the county. I also believe that the County should have the 329 homeowners' best interest in mind, and that safety and the current County codes should be a priority with no variation or compromises. The short-term and long-term negative, significant, and unavoidable environment impacts that this project will have on this neighborhood and nearby areas do not justify any short term financial gains for the County.

I do not believe that development as a means for profit should negatively impact the quality of life for 1000 people directly and thousands more indirectly. This project, if approved, will inevitably reduce the value of the properties located in Las Palmas 1, which in turn will lower the amount of property taxes that the county will receive. We believe that the Draft Subsequent EIR is inadequate under CEQA and contains too many holes and unanswered important and vital questions.

The site is not good for the proposed project because it is too far away from services (medical, financial services, food, shopping, transit) and infrastructure. Moreover, the parcel is not zoned appropriately. As proposed, the project will cause significant unavoidable negative environmental impacts. Therefore, I believe that this project should be built in another location that will not significantly impact the environment and adversely impact the Las Palmas 1 community and violate the current zoning of Las Palmas.

I am not sure how the county even let this project get so far as it was apparent from the time it was proposed that it was not within the zoning guidelines of the county for the Las Palmas Ranch 1 zone and the surrounding Toro and Highway 68 area.

I have 2 letters from Land Watch Monterey County and all the other reports that have been done with regards to this project and it appears the process is being circumvented for the owner's financial gain. I have read all reports done for the owner and square footage is understated versus the actual plan which in turn will show lower water requirements and wastewater requirements. A facility of this size will have enormous water usage and waste water reclaiming requirements. Not to mention the hazardous medical waste and associated materials IE: Needles, bloody bandages, wipes, etc.

69.26

I ask you to read and respond to our concerns and to take into careful consideration the enormous negative and significant environmental impact that such a commercial operation would have on a residential community.

In addition, the approval of this project against the wishes of most of the homeowners in Las Palmas 1 will encourage future litigation against the County of Monterey for approving a project that clearly violates Monterey County land use regulations and the California Environmental Quality Act (CEQA).

Thank you for taking the time to read this letter.

Please confirm receipt of this letter.

Respectfully submitted,

David Tucker

Letter 69

COMMENTER: David Tucker

DATE: April 15, 2018

Response 69.1

The commenter states that they are opposed to the project due to concerns about land use incompatibility, lighting, and noise. The commenter states that the project is similar to a hospital.

The senior living community would provide care to residents who do not require 24-hour skilled nursing care but do require personal assistance with daily living. As a senior living community, the medical services and overall activity level would be less intense than that of a hospital. For a description of the nature of the senior living community, refer to Section 4.1, *Project Objectives,* of the Draft SEIR. For discussion of lighting, noise, and land use incompatibility issues, please refer to Topical Responses F, H, and C, respectively.

Response 69.2

The commenter states that the project would cause noise impacts.

For a discussion of the project's potential noise impacts, refer to Topical Response H. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 69.3

The commenter states that the project would change the view from his home.

Please refer to Topical Response F. As described therein, the project would be visible from local roads and would also be visible from Subdivision residences. However, the project plans incorporate visual screening, and mitigation measures further reduce aesthetic impacts, including night sky light pollution, to a less than significant level. Additionally, with regard to the potential impact to the view from the commenter's home, Monterey County Code does not protect private views.

Response 69.4

The commenter states that the project would have noise impacts. The commenter states that the project is not consistent with the site's zoning.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 69.5

The commenter states that the project would cause noise impacts due to commercial and emergency traffic to the site.

Please refer to Topical Response H for a discussion of the project's potential traffic and emergency noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 69.6

The commenter states that SR 68 is at Level of Service F, and that no vehicle traffic can be added. The commenter states that the Subdivision would need to hire more security to deal with the traffic.

The commenter is correct that any increase in vehicle traffic is considered a significant and unavoidable impact, as is stated in the Draft SEIR.

Please refer to Topical Response A for a discussion of the project's impacts on security operations. The project would not result in a significant impact on police service within the Subdivision. Regarding the Subdivision's private security operations, an agreement would be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Topical Response A and Topical Response D provide a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 69.7

The commenter states that in 2006 a separate project (PLN060121) was proposed at the project site. The commenter states that PLN060121 had strict guidelines on lighting and visibility from roadways. The commenter includes documentation of PLN060121's administrative permit and design approval and the project's conditions of approval.

For additional discussion of visual impacts and mitigation measures, please refer to Topical Response F. As noted therein, mitigation is required to reduce lighting impacts to a less than significant level.

The approximately 25 pages of conditions for PLN060121 pertain to a different project that is not the subject of this Draft SEIR. The conditions do not address the adequacy of the Draft SEIR or CEQA process. therefore, no further response is required.

Response 69.8

The commenter states that the project would alter the visual character of its surroundings and would impact the view from SR 68, a state scenic highway. The commenter includes simulated images of the project's potential impact to views.

Please refer to Topical Response F. As described therein, the project would be visible from local roads and would also be visible from Subdivision residences. However, the project plans incorporate visual screening, and mitigation measures further reduce aesthetic impacts, including night sky light pollution, to a less than significant level.

Response 69.9

The commenter states that the project would violate Monterey County codes related to zoning, land use, and visually sensitive areas.

Regarding consistency with the LPRSP, refer to Topical Response C. As noted therein, the project would be consistent with LPRSP policies and the residential unit cap for the LPRSP Plan Area is not applicable to the proposed project because the project is not residential.

Response 69.10

The commenter states that there are concerns about traffic and safety, including risks to children that use the Subdivision roads.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 69.11

The commenter states that the intersection of SR 68 and Reservation Road is a bottleneck. The commenter states that the traffic report by Keith Higgins does not fully analyze the project's traffic impacts.

Please refer to Topical Response D regarding potential impacts to SR 68 and Reservation Road. As stated therein, the project would result in LOS C traffic conditions at the intersections of SR 68 ramps with Reservation Road, which would be acceptable.

Response 69.12

The commenter states that the project would include a commercial kitchen that would make approximately 600 meals daily. The commenter states that neighboring homes would be impacted by the odor from the senior living community's meals.

The senior living community would host a maximum of 142 residents. Meals and meal preparation would occur throughout the community, rather than in one central location. The Casitas units, with a total of 42 beds, would include a private kitchen.

Odor is discussed in Section 6.0, *Air Quality,* of the Draft SEIR, and again in Topical Response C. Odors released outdoors from meal preparation would be intermittent and unlikely to be objectionable to the extent of causing a public nuisance.

Response 69.13

The commenter states that because of the project's large size, there would be impacts on public services including water, traffic, and emergency services.

Development impact fees would be paid to mitigate the project's contribution to public service demands. As stated in Topical Response A, the project would also provide its own on-site security and would implement fire design recommendations from the MCRFD. Section 11.9, *Public Services,* of the Draft SEIR, contains discussion of public services and has been revised to clarify that the project would have a less than significant on fire and police protection services. Implementation of

the project would not require new or expanded public facilities to continue providing the existing level of public services experienced by residents in the vicinity of the project site.

Water supply is discussed in Section 10.0, *Water Supply,* of the Draft SEIR, and in Letter 3, above, from the Monterey County Water Resources Agency.

Traffic is discussed in Topical Response D. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

Response 69.14

The commenter states that the project would represent a substantial population increase in the Las Palmas Plan Area, by adding 142 residents, 92 employees, and additional vendors/visitors. The commenter states that the project would add approximately 300 people to the community. Please refer to Topical Response C regarding growth inducement. As stated therein, while the proposed project would indirectly result in business and population growth due to the increased local investment from revenues generated by the project, projections of any potential growth would be speculative.

The Draft SEIR includes analysis of potential impacts associated with growth, including traffic and noise. These impacts were determined to be less than significant or less than significant with mitigation incorporated, with the exception of traffic impacts to SR 68, which would be significant and unavoidable. For a discussion of traffic, refer to Topical Response D, and for a discussion of noise, refer to Topical Response H.

Response 69.15

The commenter states that the project would add 300 people to the Las Palmas Plan Area, which would be a 25-30% population increase. The commenter states that a ten percent increase in water consumption requires a Water Supply Assessment (WSA).

The commenter's population increase estimate includes employees, visitors, and vendors. The maximum number of individuals that would be living in the senior living community would be 142.

The commenter refers to Senate Bill 610 (SB 610), which requires a WSA for development projects that represent a ten percent increase in service connections for a water utility. "Service connection" refers to the piping that connects a building to a water distribution line. Therefore, the number of connections added by the project would be far less than the number of individuals that would reside there. Regarding the Senate Bill 610 provision that the commenter references, the number of new connections would be compared to the existing number of connections that the public water system is currently serving. The system serving the project site is the Salinas Hills service area of the California Water Service Company Salinas District. The Salinas Hills service area serves 1,639 connections, according to the 2015 Salinas District Urban Water Management Plan. Therefore, the project does not trigger a WSA based on an increase in service connections or any other parameters under SB 610.

Response 69.16

The commenter states that additional analysis of traffic impacts should be performed because traffic impacts could affect emergency response services. The commenter asks if adequate fire services exist to account for the project's demands.

Please refer to Topical Response B. As stated therein, Section 11.9, *Public Services,* of the Draft SEIR, has been revised to include anticipated response time for fire protection services provided by the MCRFD to the project, which would be approximately five minutes for emergency calls from the Toro Station. The Toro Station would be the primary fire station for the project site, providing fire protection and emergency medical response to the project site. The project proponent would be required to pay development impact fees that would go toward funds to maintain fire protection facilities, pursuant to Monterey County's Fire Mitigation Fee Ordinance (County Ordinance Title 10, Chapter 10.80; Monterey County 2019). The MCRFD reviewed the proposed site plan and building plans and determined that new or expanded fire facilities and additional equipment are not needed in order to provide fire protection services to the project. Therefore, the project would have a less than significant impact with adherence to applicable fire safety codes and design features as approved by MCRFD and payment of the County's Fire Mitigation Fee. Also refer to Topical Response D for discussion of traffic impacts related to emergency access. Topical Response D explains that a new access route to the project site would not be necessary to avoid impacts on traffic circulation because the level of service on roads providing access to the project site would remain acceptable under the project.

Response 69.17

The commenter states that the project would impact medical services for Subdivision residents due to a spike in population. The commenter states that fire protection would also be affected.

Section 11.9, *Public Services,* of the Draft SEIR, has been revised to include information about the capacity of and primary contingency plan at the Salinas Valley Memorial Hospital, which is the nearest public hospital to the project site. It is reasonable to assume that the Salinas Valley Memorial Hospital may receive project residents needing emergency care due to its proximity to the project site. However, the commenter is speculative in assuming the Memorial Hospital would be the sole medical care facility used by project residents and employees. The project itself would provide on-site day-to-day medical assistance for residents as noted in Section 4.0, *Project Description,* of the Draft SEIR. Please refer to response 69.16, above, pertaining to fire protection services for the project.

Response 69.18

The commenter states that the project would affect the Monterey County Sheriff's Office service ratio target of one deputy per 1,000 persons.

Please refer to Topical Response A and Topical Response B. As noted therein, Section 11.9, *Public Services,* of the Draft SEIR, has been revised to clarify that the Monterey County Sheriff's Office has a total of 442 employees that consists of 320 sworn officers and deputies, and 122 non-sworn officers and professional staff. Based on the County's current population estimate of 110,000 residents (unincorporated), the Sheriff's Office maintains a service ratio of approximately three sworn officers for every 1,000 residents (unincorporated). Implementation of the project would not require new or expanded Sheriff facilities to continue providing the existing level of police protection services experienced by residents in the vicinity of the project site.

Response 69.19

The commenter states that the project would have strict fire alarm requirements that could lead to noise impacts from fire alarms and emergency response vehicles.

For a discussion of the project's potential operational noise impacts, refer to Topical Response H. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated. As noted in Topical Response H, sirens from emergency vehicles would result in a short-term spike in ambient noise levels at nearby residences. However, there is an agreement in place that the Subdivision is a "no-siren zone." Additionally, the County Code exempts "emergency vehicles being operated by authorized personnel" from noise regulation. Therefore, emergency vehicles would have a less than significant impact on ambient noise. Impacts from fire alarms would be similar.

Response 69.20

The commenter states that the senior living community would include door alarms that could cause noise impacts.

For a discussion of the project's potential operational noise impacts, refer to Topical Response H. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 69.21

The commenter states that the project may include a generator. The commenter states that generators normally self-start twice a week for 30 minutes, which could cause a noise impact. The commenter reiterates concerns about alarm/emergency response noise impacts. The commenter states that HVAC systems, commercial kitchens, and vehicles could also cause noise impacts.

For a discussion of the project's potential operational noise impacts, refer to Topical Response H. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 69.22

The commenter states that the project would cause light impacts from lit buildings and vehicle headlights.

Please refer to Topical Response F for a discussion of light pollution. As noted therein, incorporation of mitigation would reduce lighting impacts to a less than significant level.

Response 69.23

The commenter encourages consultation with Salinas Rural Fire.

Please refer to Topical Response B. As stated therein, Section 11.9, *Public Services,* of the Draft SEIR, has been revised to include information about the MCRFD, specific to the Toro Station which would be the primary responding station for the project. The MCRFD reviewed the proposed site plan and building plans for the project. The project would implement all design recommendations provided by the MCRFD to ensure project compliance with the Fire District's regulations and reduce fire hazards on the project site.

Response 69.24

The commenter notes that the Draft SEIR includes mitigation measures that require relocation of certain species. The commenter asks if this is a standard mitigation and if species are likely to survive the relocation process.

Relocation of wildlife from construction areas is a typical mitigation measures employed on almost every project. A Draft SEIR can only require relocation of no-listed species (i.e., those species not protected under the Federal Endangered Species Act or the California Endangered Species Act). Listed species can only be relocated by a permitted biologist and only if the project has been issued "take" authorization from CDFW and/or USFWS. The relocation of non-listed wildlife is limited to small amphibian, reptiles, and mammals, and is done by a biologist qualified and experienced with the safe capture of wildlife. The wildlife is generally relocated to the closest area of similar habitat outside of the construction footprint, with no risk of injury or mortality. Larger species such as foxes, racoons and deer would not be captured, would be avoided, and would be allowed leave the site of their own volition.

Response 69.25

The commenter states that the project is inconsistent with the site's zoning. The commenter states that the project would have impacts on property values and quality of life for neighboring residents.

Please refer to Topical Response C. As described therein, the project would be consistent with the site's zoning and land use requirements. Further, property value and quality of life are not environmental impacts and are not directly analyzed in the Draft SEIR.

Response 69.26

The commenter states that additional concerns have been noted in two letters from LandWatch Monterey County, and states that other reports conducted for the project were prepared in a way to benefit the owner by underestimating the total square footage for the purpose of underestimating water requirements and wastewater generation. The commenter also expresses concern regarding hazardous medical waste generated by the project.

The LandWatch letters are included herein as Letters 4 and 6. Refer to Responses 4.1 through 5 and 6.1 for responses to these letters.

The total square footage (110,085 sf) is provided in Section 4.0, *Project Description*, of the Draft SEIR. Water demand was estimated using the total number of units, not the square footage of the total facility. This provides a more accurate estimate of the water needs, as it is divided into each subcategory of water fixture, including sinks, toilets, showers, and other fixtures that would utilize water. The wastewater generation was also not estimated based on the total square footage, but based on the total number of people utilizing the facility. This is described in Section 11.12, *Wastewater*, of the Draft SEIR.

Section 11.5 of the Draft SEIR describes the use of hazardous materials on the project site, including medical waste. As stated therein, the project would be required to adhere to state and local regulations for appropriate transport, use, and disposal of medical waste. This impact was determined to be less than significant.

The commenter's opinion is noted and herewith shared with the County's decision makers for consideration.

April 16, 2018

Vince & Dorey Cardinale
17527 Sugarmill Rd
Salinas Ca 93908

Letter 70

Mr. Carl Holm, Planning Director,
holmcp@co.monterey.ca.us
Mr. Joseph Sidor, Associate Planner,
Sidorj@co.monterey.ca.us
Mr. Brandon Swanson, Planning Manager,
swansonb@co.monterey.ca.us

Gentlemen:

I am original owner and resident of Las Palmas 1 since 1990. I am strongly opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372). This community was chosen by the residents as a quiet, safe and relatively dark haven from the Salinas proper area. 70.1

As an original owner I was promised by Michael Fletcher, the Las Palmas developer, that Las Palmas would be “Country Living” . This promise will be broken if the proposed development is approved. This proposed large non-residential development is inconsistent with the Las Palmas community core values.

I will site several reasons as to why we oppose the RVLP PLN#150372.

I. Traffic: • River Road Traffic: The stop light at LP1 entrance has seen 20 accidents over the last 10 years. One 4-year old child has already died by a texting drunk-driver. 70.2

• Potential Accidents:

Currently, the curve blocking the visual to the LP1 light going south, allows only 4-5 seconds (traveling at 55 mph) before reaching the intersection. This short distance is suspected as the cause of several accidents at this point. I personally was nearly hit by a Monterey County Sheriff who ran the red light in December of 2012. Additional traffic for the “Parcel Q” will aggravate this situation.

If the proposal is approved, any celebrations with family members over holidays and family events at “Parcel Q” will significantly increase the traffic load and potential for accidents.

• Security Stops:
Traffic already backs up into the River Road exit lane at peak times due to our security check point. Adding 50-90 cars and construction vehicles a day will increase the potential for further traffic congestion and accidents.

• Emergency Situations:
A NW wind driven fire could spread exponentially in these closely packed houses as seen in recent fires in both northern and southern California. There are only 2 exits to get out for more than 300+ homes plus the emergency vehicles, potential staff and patients! 70.3

• Construction Traffic:
The traffic generated by the construction phase will be extremely problematic. This quiet valley is nestled between two large hill sides. Any construction traffic noise would be echoed off the hills. Construction and delivery equipment would need to climb a steep entrance road at low gear. 70.4

Any subsequent grading equipment will emit a loud back up beeping noise that will be heard from all LP1 units. This constant and increased traffic would irrevocably alter the safe, peaceful nature of the community.

• Commercial Traffic:

The proposed development would bring increased emergency fire and ambulance calls as both are required to attend. These will bring unwanted noise and light pollution at all hours of day and night. Any commercial vehicles -- food deliveries, medical waste, trash, linen, etc., -- and potentially 90+ employee vehicles will funnel through a narrow street originally designed for residential traffic.

II. Security •

Security of the neighborhood would be compromised by this unwarranted, greedy assault on LP1 community. As this will open the neighborhood to non-residential traffic, we fear an increase in crime that has decreased since installation of LP1 security personnel. 70.5

There will be no way to regulate this increased traffic and guarantee the security of the neighborhood. This is a very real concern.

III. The Proposed Non-Residential Development is Inconsistent with the Existing Residential Community
• Under The Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood. • This parcel is zoned "medium density residential," at 2.61 units per acre. Under the Las Palmas Plan this parcel was specifically approved for 8 unit's total. The developer now seeks a "conditional use permit" to allow development of a non-residential facility with a total of 105 units. 70.6

This is inconsistent with The Las Palmas and Monterey County Plans. • The developer seeks to circumvent these plans by requesting an amendment for a non-residential use. Specifically, the developer asks you approve an amendment with the following language; "Assisted living facilities are not considered residential units (and should not be) subject to the residential limitation of the (Las Palmas) Plan." An assisted living facility is not a residential use, because it does not operate or function in a manner like independent residential units.

• Las Palmas is a highly desirable residential community with stable property values. Residents fear the loss of their investment potential from a rush to get out of LP1 due to the nature of this development. Several friends have moved out fearing this project.

• To approve this amendment to the Las Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community .In closing we strongly urge you to oppose this development as proposed.

With Kindest regards,

Vince & Dorey Cardinale

Letter 70

COMMENTER: Vince and Dorey Cardinale

DATE: April 16, 2018

Response 70.1

The commenters state that they are opposed to the project, noting that the project would be inconsistent with the community's core values.

The commenters' opposition to the project is noted and herewith shared with County decision makers for their consideration. The commenters' individual environmental concerns are addressed below.

Response 70.2

The commenters state that the entrance to the Subdivision has experienced traffic accidents, and that the security checkpoint causes congestion. The commenter states that holiday parties and special events at the senior living community would aggravate traffic safety risks.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

The proposed project would not include large holiday parties or special events open to the public.

Response 70.3

The commenter states that there are only two exit routes available for emergency evacuations in the event of a fire.

Please refer to Topical Response D. The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project.

Response 70.4

The commenter states that the project would cause noise and light pollution impacts resulting from increased traffic and construction activities.

Please refer to Topical Response F for a discussion of light pollution. As noted therein, mitigation is required to reduce lighting impacts to a less than significant level.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 70.5

The commenter states that the project would compromise the Subdivision's private security operations.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision. Regarding the Subdivision's private security service, refer to Topical Response I, which discusses the project applicant's responsibility to share in the LPHOA's security costs.

Response 70.6

The commenter states that the project is inconsistent with the site's zoning and the applicable land use plans. The commenter states that the project would affect property values and quality of life.

Please refer to Topical Response C. As described therein, the project would be consistent with the site's zoning and land use requirements. Further, property value and quality of life are not environmental impacts and are not directly analyzed in the Draft SEIR.

Letter 71

RECEIVED
APR 23 2018
Monterey County RMA

From: Kurt Krieg Date: 4-16-18.

Address: 21103 Old Ranch Ct.

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us

roygobets@aol.com , Roy Gobets 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Joe,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. 71.1

I strongly urge the developer to find alternate venue and access for his proposed facility.

Please respond to the issues I listed above in writing.

Respectfully,

X Kurt Krieg

Letter 71

COMMENTER: Kurt Krieg

DATE: April 16, 2018

Response 71.1

The commenter states that the project is inconsistent with surrounding land uses and would cause impacts on traffic and safety. The commenter urges that the project be relocated.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classifications, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

RECEIVED
APR 19 2018
Monterey County RMA

April 16, 2018

Melody McDonald
17590 Winding Creek Rd
Salinas, CA 93908

Letter 72

Joseph Sidor, Associate Planner
Monterey County RMA Planning Second Floor
1441 Schilling Place, Salinas, CA 93901

Subject: RV PL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN #150372)

Dear Mr. Sidor,

I am very concerned about the proposed project. The extra congestion of traffic at our entrance concerns me very much. Its proposed use of the Las Palmas 1 will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. I respectfully urge the developer to find an alternate venue and access to his proposed development. Thank you for your consideration in this matter.

72.1

Respectfully, Melody McDonald

Letter 72

COMMENTER: Melody McDonald

DATE: April 16, 2018

Response 72.1

The commenter states that they are concerned that the project would congest traffic at the Subdivision entrance, resulting in safety problems. The commenter urges the developer to find an alternate venue and access point for the project.

Please refer to Topical Response D for a discussion of a separate entry for the project. As noted therein, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts. Additionally, the project would not result in a substantial increase in traffic within the Subdivision.

Letter 73

From: tom mercurio
To: Sidor, Joe (Joseph) x5262
Subject: Fwd: Fwd: PARCEL Q/RVPL DRAFT SEIR FOR PROPOSED DEVELOPMENT
Date: Monday, April 16, 2018 12:40:57 PM

-------- Forwarded Message --------
From: tom mercurio <aemt5@aol.com>
Subject: Fwd: PARCEL Q/RVPL DRAFT SEIR FOR PROPOSED DEVELOPMENT
References: <8daea8e1-0725-97f0-5955-c9b2ff69e101@aol.com>
To: Roy Gobets <roygobets@aol.com>
Message-ID: <8792e07b-9277-ba3d-6d4b-718b9e7354cc@aol.com>
Date: Mon, 16 Apr 2018 12:39:15 -0700
User-Agent: Mozilla/5.0 (Windows NT 6.1; rv:45.0) Gecko/20100101 Thunderbird/45.8.0
MIME-Version: 1.0
In-Reply-To: <8daea8e1-0725-97f0-5955-c9b2ff69e101@aol.com>
Content-Type: multipart/alternative; boundary="----------0725DB7D59F7E782B7B586B6"

April 16th, 2018

Mr. Joseph Sidor, Associate lPlanner
Monterey County RMA-Planning Second Floor
1441 Schilling Pl, Salinas, Ca.
(831) 755-5262

My name is Tom Mercurio and have been a Resident of Las Palmas 1 for the past 6 years. Prior to my retirement, I was in the Food Service and Hospitality Industries as part of the upper management teams for various companies. That experience served me well as a member of the business community in understanding the complexities of what it took to make a successful company. The purpose of this correspondence is to express my deep concern by the proposed Parcel Q. development and the impact it will have on The Las Palmas Ranch community. Prior to getting into the specifics, I would like to make a few comments and observations. Upon review of the E.I.R., it is clearly evident that it has been written with bias towards the developer and has many errors. As an example, in the reports introduction opening statement about the **purpose of preparing the E.I.R.** where as it states that the developer _ volunteered to do an E.I.R. Quite the contrary, it was the County Planning Department that required such a report due to the circumstances surrounding the proposed project impact to the Las Palmas community and C.Q.E.A. This statement sets the entire

73.1

tone for the report as to its biases and errors. Therefore it proposes to ask the question as to why the Planning Department accepted it? Also, it is important to note that a planning review is not evident.

In the fall of 2017, I obtained a copy of the 7/24/2017 A.D.E.I.R. as prepared by E.M.C. through a public record request. Fast forward to March 2018 when the S.D.E.I.R. was posted on the RMA website for public comment. I can find no visible indication that the S.D.E.I.R. was critically reviewed by the county prior to posting for public comment, which is a CEQA requirement. With the exception of the document dates, some minor formatting, text shifts and a missing set of pages (3-14 and 3-34); tables dealing concerning consistency with applicable plans I can detect no difference in substance between the A.D.E.R. as submitted to the county on 7/24/2017 and the posted version dated 1/29/2018. Is this correct? If so, where is the RMA content review and analysis? Does RMA support the claims and ass

"The draft EIR which is sent out for public review must reflect the independent judgment of the lead agency. The lead agency is responsible for the adequacy and objectivity of the draft E.I.R." Note: authority cited: section 21083 public resources code; reference; section 21082.1. Why was this document posted for public comment without RMA analysis evident. I may have missed something if so, please point it out. Further, where is RMA counsel review regarding the rather bold land use claims and the proposed amendment to the Las Palmas specific plan? Surely, RMA counsel must weigh in on the various claims about zoning, easement and conformance to LPSP, etc. Are we to understand that RMA endorses these? It is my understanding that the selection of the company to perform the review is to be done by the county and paid for as well. Reimbursement then would come from the developer to the county. Since the developer was allowed to choose the company and pay for its services directly the questions arises if this is ethical and should the report be accepted.

The following information and questions are based on the premise of how does the developers plan (Lombardo & Assoc. letter to the County planning department May 2016 as well as the E.I.R. (Jan. 19th, 2018) not conform to the Las Palmas Ranch Specific Plan in addition to issues with the E.I.R. itself?

VIEWS

L.P.R.S.P STATES IN ORDER TO PRESERVE THE SEMI-RURAL CHARACTER OF THE AREA AND TO MITIGATE ADVERSE IMPACTS ON significant view shed areas, higher density housing should be clustered behind natural land forms, generally at lower elevations and not on steeper slopes or ridge lines. Also, on the L.P.R.S.P. (page roman numeral 2-3, policies/item 2 states to prohibit building on ridge lines visible from designated scenic corridors as delineated on figures H&K). The key phrase is "prohibit building" which doesn't mean to build and then attempt to screen. 73.2

The developers plan, (pg.4) states that a significant amount of landscaping will screen views of the project from neighboring properties and distant views from Hi-way 68. The E.I.R. further states that this problem also will be resolved by obstruction from existing single family residences, topography, in addition to landscaping. This is attempted to be supported by photos 5-6, 5-7 and 5-8 within Section 5.0 which only show certain view points and angles creating a misleading image of the projects view from within the development, which in actuality will be seen clearly from many different areas of L.P. This became obvious when 73.3

the developer placed wooden skeletons of various structures, outlined with orange tape mimicking what an actual structure on the top of the plateau facing country park rd. would look like.

When examining photos 5-6 and 5-8 of the E.I.R.,they show existing eucalyptus trees, which has been pointed out will be removed when the buildings are erected. This then will make the building structures easily visible from many points with L.P. A point of interest is both the E.I.R. and the project plan state that installing a significant amount of landscaping will block views from Hi-way 68. With the main building structures being approximately 28 ft in height and that planted trees will be used to screened them will be 48 inches tall, it will take, if ever, many, many years before these structures will be blocked from view. Is this acceptable, I think not. Another significant thing to point out is that the E.I.R. fails to mention views from Spreckles Blvd. which will also be effected.

ZONING

According to the L.P.R.S.P.(chapter 3,section 2, pg. roman numeral 3-2) single family lots larger than one acre ordinarily should be placed in "RR-1-S" (integrated single family) R-2. The E.I.R. states that the developer will ask for an amendment of the existing zoning ordinance, which according to the M.D.R. includes assisted living facilities (zoning ordinance 21.12.050/c) **QUESTION**-If what is stated is correct, why then is the developer asking for an amendment to the current MDR Zoning? 73.4

LAND USE-

According to the developers letter to the county (May 2016) because the property is designated MDR/2.61 units per acre, up to 40 dwellings could be approved. What isn't stated is the L.P.R.S.P. states that only a total of 1031 residential units are allowed and with already having 1028 units, only 3 more can be developed. The developer is attempting to use a scare tactic that if the project is not approved there could be even more of an impact to L.P.R. This is not accurate. The project includes 13 Casitas structures, providing 26 separate units. A Casitas by definition is a "small home." The developer on one hand states these are not independent living units and therefore don't qualify as individual residences. 73.5

In the May 2016 planning document (pg. 2) residents (a resident is a persons home, the place where someone lives) may maintain a moderate level of independence in their life style. By definition, moderate means "average in amount" and therefore these Casitas are independent living units.(residential in nature) By examining the drawings provided in the E.I.R. The 13 structures are identical in appearance to a duplex which is in fact a residential unit as well. In conclusion with these Casitas being individual residences the project exceeds by 23 the number of residences allowed to be built.(3) The L.P.S.P. states altering existing scenic vistas and visual character of the project site is not allowed. The proposed solution, according to the E.I.R. (table 2-1 pg. 2-3) will only solve a small part of the problem.

EMERGENCY EVACUATION/FIRE PROTECTION

According to the L.P.R.S.P. (page roman numeral 2-25 concerning fire protection, it states "that according to the fire district, significant development in the River Road ADC may at a future point require the development and manning of a new fire station in the River Road area." Therefore, the question needs to be asked, since the plan was done in 1983 when this statement was made, has there been development to the extent that this recommendation should be considered? One would think that with the size of the proposed development on Parcel Q, that in of itself may require the recommendation to go forward with building a new 73.6

fire station. If so, will the developer be required to pay for it?

The E.I.R. Document (Pg. 9.4 under "emergency access) states that in the event of an emergency evacuation, it would be accommodated by the existing neighborhood roadway system. Further, it states that implementation of the proposed project would not result in inadequate emergency access to the project site itself or to the residences in the L.P.R neighborhood. Once again the E.I.R. does not fully address this issue and makes statements that are totally false. In the event of an emergency evacuation, there is but a single road (Woodridge Ct.) in and out of the development, which at some point reduces in width to only 27 ft. Is this road width adequate to allow two way traffic and sufficient to accommodate emergency vehicles attempting to gain entry? 73.7

Emergency vehicles would have additional difficulty in gaining access to the development due to the evacuation of all staffing personal and visitors attempting to leave who would also have difficulty in exiting the facility. There would be other vehicles attempting to get into the development in order to provide transportation for residents not having their own vehicles. Lets not forget the physical limitations of those who would reside in the facility. Many of them would be non ambulatory and require assistance in evacuation. To further complicate this problem, the residents on Country Park Rd. and other roads in L.P.R , would also be a attempting to use Woodridge Ct. as an exit road within the development. 73.8

Currently Country Park Rd. dead ends prior to reaching Woodridge Ct. which is only due to the placement of bollards. However, these bollards are made to be easily removed by hand in order to provide direct access to Woodridge Ct. which is part of L.P.R. emergency evacuation plan. This is a disaster waiting to happen. Can one imagine the massive gridlock that would take place. Given the recent issues in the country where as there have been many incidents of long term care facilities experiencing such problems resulting in deaths to its residents. If the county doesn't insist that this issue be addressed and resolved(with a single road in and out of Parcel Q the only certain way to prevent such an occurrence would be to not build such a facility at this location.)

Both the developer and the county would open itself up for many lawsuits that could result because people died due to inadequate emergency evacuation procedures. The easement that the developer has in order to gain access to the property, is just only that, an easement with ingress and egress rights and nothing more. It also needs to be mentioned that there is a possible issue regarding access to the fire hydrant on Woodridge Ct., which is located about half way down the street. It would appear that this hydrant was placed at this location in order to service the needs of a fire engine in the event of a fire in this part of Las Palmas 1.

During the Parcel Q construction, there would be numerous construction vehicles moving up and down Woodridge Ct. along with the many vehicles that would be illegally parked along the roads as well.(i.e. construction workers, the staging of construction vehicles waiting to enter the construction area.) This then brings up two issues, the first being how would a firetruck gain access to this hydrant in the event of a fire in this part of Las Palmas? Second, how are the vehicles that are attempting to park on Woodridge Ct. (according the the L.P.R.S.P. this is not permitted) going to be prohibited from doing so.

When I posed the question of fire truck access to the hydrant on Woodridge Ct. to the Monterey County Fire Chief,his response was that there are other hydrants located in Las Palmas within the 1200 ft. limit capacity of the fire truck hoses. I myself live across from

Woodridge Ct. on Country Park Rd. and would be extremely concerned about the time factor necessary for a firetruck to hook up its hose to another hydrant far away from my house and run it to the fire. With the fire hydrant centrally located on Woodridge Ct. it would provide much quicker access for a firetruck to deal with a fire in my immediate area.

TRAFFIC/TRANSPORTATION

I have broken down the effects of traffic and transportation issues into four different segments.

73.9

1. E.I.R TRAFFIC STUDY

In the E.I.R., there isn't any mention about the problems of access to L.P.R. that would be caused by the development as a result of the guard gate and the required check in procedures that presently exist. The only mention of this is that it is stop controlled which does not explain the full issue. Yet another example of the E.I.R. conveniently leaving out pertinent information as to the effects of Parcel Q development in Las Palmas. L.P.R. residents currently have to stop at the guard gate in order to be properly identified to gain access to the ranches development. This is extremely important to the security of L.P.R.

According to the E.I.R., employees will start arriving around 6 a.m. which is prior to the guard manning the gate which occurs at 8 a.m. Therefore in order to maintain security, which is one of the main reason residents have chosen to live in L.P.R. The guard gate will have to be manned an additional 2 hours every morning in order to maintain security. This will result in added security costs(overtime as well as the guard is presently on an 8 hr. shift) and presents the question is the developer aware that he will have to pay for this? The larger concern is the back up of traffic on the River Road exit lane that will occur as a result of that traffic that will be created with the day to day operation of the Parcel Q. facility. To what extent is unknown as once again the E.I.R. has conveniently not addressed this problem. The only thing that is mentioned, states that the impact at the intersection of River and Las Roads due to the project would still be at acceptable levels. Without addressing what has been pointed out, the traffic study once again is flawed.

2. Traffic Counts

Upon review of the traffic study analysis, it is clearly evident that the study failed to include among other services, emergency, shuttle and visitors vehicles. Therefore the analysis conclusions are not accurate and should be redone. As to the projected 363 vehicles per day that would occur on Woodridge Ct. on the surface doesn't seem like much. However, consideration needs to be given that the majority of this traffic would occur between 6 a.m. and 8 p.m. This then would equate to 26 trips per hour or almost 1 trip every two minutes in an residential area, which would be a heavy impact on that road. Once again, the E.I.R. attempts to paint a picture that is not realistic.

73.10

3. PEDESTRIAN TRAFFIC

Currently the access to the main park in L.P. 1 (Cory Park) from Country Park Rd. and other surrounding roads is across Woodridge Ct. The pedestrian traffic of children and families utilize this as a means of accessing the park, which mostly consists of children and families, who utilize the park for recreation such as family gatherings, owners playing with their dogs, hitting of golf balls, playing catch, etc. as well as the main access point to the areas trail. This anticipated vehicle traffic of 363 cars between the hours of 8 a.m. to 8 p.m.(daylight savings time)(not including visitors, service, shuttle and visitor vehicles) equates to 30 trips per hour. This mix of traffic and pedestrians makes this a recipe for disaster.

73.11

4.PROJECT TRIP DISTRIBUTION AND ASSIGNMENT-SECTION 9.0 TRANSPORTATION AND TRAFFIC

The E.I.R. states that the project would add about one am peak hour trip and four p.m. ones to the two lane section of SR68 immediately west of the Toro Park interchange. Additional trips due to Project Q's development would have no impact on traffic flow because project traffic will dissipate at the many crossroads including Tierra Road and Laureles Grade. This is not an accurate assessment. The majority of this anticipated traffic would be made up largely of workers cars and their shuttle vehicles. Personnel who would be employed at the facility for the most part don't live in these areas serviced by the crossroads mentioned. 73.12

Therefore the conclusion stated in the E.I.R. is flawed. While all these analysis of traffic flows refer to peak hours, consideration needs to be given to commute hours. According to Caltrans Hi-way 68 starts to become congested starting around 6 a.m. With hi-way 68 already being congested during commute hours, the addition of vehicles due to the Parcel Q development will make this situation much worst. Is this what we want for Hi-way 68? As to the traffic counts and impacts stated in section 9.0 pg. 9-21 a question needs to be asked as to whether or not the analysis comparisons were done with the originally planned one house on Parcel Q?

INCLUSIONARY HOUSING

Upon review of the E.I.R. the developer does not address the county requirement of Inclusionary Housing. According to Delinda Robinson of the Monterey County Economic development department in a letter to Jan Royer Barr, Housing Program Manager(June 3,2015) that under the Countys Inclusionary Housing Ordinance #5175 Section 18.40 (A) this would be a requirement for this development. 73.13

EASEMENT

The May 2016 letter to the county by the developer (pg.5) states "Parcel Q has clear rights to the use of Las Palmas and River Rd. and Woodridge Ct." It goes on to say that "those roads were dedicated as part of the L.P.R. Subdivision with no restrictions as to there use. This is also stated in the E.I.R. However, this statement is not accurate. The easement rights that are attached to the owners Grant Deed reads as follows; "a non exclusive easement for ingress, egress, road and utilities over that portion of River Run Road and Woodridge Ct.being a portion of common area Parcel C and Las Palmas Road being common area Parcel A as shown and designated on the map entitled amended map of Las Palmas Ranch Corey House Area/Unit 1, tract 1086 A filed June 15,1989, in volume 16 of cities and towns at page 70 in the office of the county recorder of Monterey County, Ca. Said easement shall be appurtenant to Parcel Q as shown and designated on the above referred map of Tract 1086A A.P.No.139-211-035." 73.14

Currently Woodridge Ct., which this easement is on, is a means of foot traffic and bicycles to access the park across the road which is heavily used by families. Use of this easement both during and after construction would provide safety hazards to those attempting to cross Woodridge Ct. I believe that a review of the easement document makes no mention that it can be used for commercial development traffic. Since the original developer planned on putting a single home on this parcel that would make sense. Other related issues to the easement are questions that need to be asked.

Sewer Hookup-The projects sewer installation will be need to be connected with the existing 73.15

Las Palmas one, which stops at the end of Woodridge Ct. How doe the developer propose to connect his sewer with the existing one without tearing up Woodridge Ct.? The same holds true for storm water run off. Once again the existing easement can only be used for ingress and egress. Also, were the existing storm water runoff drains and sewer drains originally constructed to handle the volume of flow for a facility the size of what is being proposed? This would appear not to be the case due to the original L.P. developer wanting to construct a single home on Parcel Q. 73.16

PARKING

With the limited parking space available to those who will work at the facility, consideration should be given as to what will need to be done to prevent parking on Woodridge Ct. which is H.O.A. property. The H.O.A. considers this to be trespassing. Also, where are the trucks and heavy equipment going to be staged as well along with construction workers parking? The only possible area would be the Woodridge Ct. Rd. which is owned by the Las Palmas H.O.A. In this area the developer has stated in a letter to the county in May of 2016 pg. 5, that Las Palmas road, River Run and Woodridge Ct. are private roads maintained by the L.P.R. H.O.A. Those roads were dedicated as part of Las Palmas Subdivision #1 with no restrictions as to their use. Parcel Q has clear rights to the use of the private roads for the pr 73.17

In the case of Woodridge Ct., which is also owned by the H.O.A., the only rights that the owner of Parcel Q has is ingress and egress.(as stated in their Grant Deed) They cannot do whatever they want to this or any other road in the sub-division. Therefore, the developer cannot use Woodridge Ct. for such things as equipment staging and construction worker parking or putting Porta Potties on it. Page 17&18 of the H.O.A.'s CC&R's, section 7.14 states that parking and vehicular restrictions state that none of the following, collectively "prohibited vehicles" shall be parked, stored or kept on any street public or private within the properties: Any large commercial type vehicle(including, but not limited to any dump truck, cement mixer truck, oil or gas truck of delivery trucks) etc.

AIR QUALITY

The E.I.R. in section 6.0, titled air quality, makes mention of short term construction impacts. The E.I.R. estimates construction to take 18-24 months which would not be short term. It also refers to earth moving equipment as being light in nature. The majority of earth moving equipment is very large and heavy. When discussing the impacts on air quality, the E.I.R. doesn't take into consideration dust from dump trucks that will be coming and going with fill material for the project. Given the estimate of fill needed for the project which is stated in the E.I.R. would come to an estimated 5,000 trips would be generated. I can find no mention of what the effect would be on toxic air contaminants. 73.18

GEOLOGY AND SOILS-SECTION 11.0 TITLED EFFECTS NOT FOUND TO BE SIGNIFICANT

There is reference to a geology hazard report and soil engineering feasibility investigation prepared for the project by Lanset Engineers, Inc. date 2014. This makes this report almost 4 years old and consideration should be given to determine whether or not it needs to be updated. In this section, there is a sub-heading title **Effects not found to be significant** with reference to "landslides" it stated in the E.I.R. that building foundations will be located within geologically suitable building envelopes so as to not be effected by landslides. However, when the developer placed wooden skeletons, outlined in orange tape, representing how buildings would appear, it was evident that these buildings are very close to where a previous landslide occurred last year. He states that this slide was a minor Colluvium slope failure due 73.19

to unseasonably above average participation and was a low risk to human health and safety.

Upon review of rainfall records for our area, from Jan. to March 2017(the slide occurred in March of 2017) the amount of participation was 11.28 in vs the normal of 7.35 in. This unseasonably amount of rainfall was only a few inches above normal. It would be reasonable to think that yearly rainfall during that period of time could easily be repeated to the amount in 2017 or greater. Contrary to the E.I.R.'s statement this poses are real problem. As to human health and safety not being an issue when this slide occurred, several homes experienced water coming up to the foundations of their homes and only the efforts of the local fire department and neighbors this could have become a real disaster.

AESTHETICS SECTION 5.0

Table 2-1 states that the significant impact that the project will cause to the altering of existing scenic vistas and visual character of the project site will be mitigated by landscaping, thus reducing the impact to less than significant. According to the E.I.R., trees of 4 feet in height will be planted for this purpose. Taken into consideration the proposed multi-story building which will be 28 ft. in height, it will take many, many years to achieve this, if at all. The E.I.R. states that the development would be viewed minimally from highway 68, which is incorrect. What it is talking about is the entire L.P.R. development and not just Parcel Q. It goes on to say "the visual impacts of this project are not unexpected or significant." The LPRSP F.E.I.R. (pages 56-59) recognized that the development of Las Palmas Ranch, **including this site** would be expected to change, etc. The LPRSP F.E.I.R. does not state the words **including this site.** The E.I.R. is attempting to show that the LPRSP F.E.I.R. knew and was o.k. for there not being any significant visual impacts that this site, if developed would present. 73.20

Once again the E.I.R. is using statements from the L.P.R.E.I.R. to support its statements that this is about the Parcel Q, site, when its in fact talking about the **entire** L.P.R. development. The photos provided(5-9) attempts to demonstrate this but doesn't show what the views would be like if the trees that currently exist on the building site were removed. This would then provide a significant impact to the view from Hi-way 68 and not minimal as stated. The report fails to mention the impact to the views from Spreckles Rd. The Monterey County Specific Plan states (policies os-1-2 that "development in designated visually sensitive areas shall be subordinate to the natural features of the area." Therefore, the question arises will this development be allowed to not adhere to the plan? Policies 5-20 essentially states that within the Toro Area Plan, new development may be permitted in such a manner that will enhance the scenic value of the area. The question needs to be asked how will the development of the project do this? Development sure wouldn't increase the scenic value of the area, quite the contrary. 73.21

POPULATION GROWTH INDUCEMENT, SECTION 14.4

The E.I.R. states that the proposed project is not a residential use under county codes or the L.P.R.S.P. and the project does not provide dwelling units that will operate or function as independent units. Therefore no direct population increase. The Casitas that are part of the development are actually independent living units. Casitas, by definition is a small home. These homes could add individuals to them thus making the project subject to population increase. Another question that needs to be asked, what if the development wants to expand its facility; would that also create population growth inducement. 73.22

E.R.R. SPECIFIC PLAN AMENDMENT-SECTION 4.0-4.2 73.23

In the first paragraph it is stated that the project does not provide dwelling units that will operate or function as independent uses. This is not correct in that it is also stated on this page that "although Casitas residents may maintain some independence in their life style, including the option of fixing their own meals and able to keep their own vehicles, a full range of assisted living services will be available available to them." Isn't this indep

The individual life style offers residents a safe living environment but with minimal assistance. Isn't this what is being offered to those who want to live in a Castias? Drawings of the Casitas look just like a duplex which are considered independent living units. Therefore the count of 26 small homes(Casitas) that are a part of this project has to be included in the calculation of adding this amount to the existing number of current homes of 1028. This then puts this project at a total number of homes at 1154, far exceeding the allowable 1031 in the L.P.R.S.P. A statement in this section is made that claims that the developer is paying monthly H.O.A. fees. A check of the H.O.A. records disputes this. This is yet another example of miss statements that should support re-doing the entire E.I.R.

73.24

SEWER/STORM WATER RUN OFF

A question needs to be asked concerning sewer installation and storm water runoff for the project. Since the parcels easement states that it can be used only for ingress and egress, how does the developer plan on connecting to the L.P. existing ones somewhere under Woodridge Ct. If the developer plans on tearing up Woodridge Ct. in order to do this, then he is going to have issues with the H.O.A. who owns the road. Another question that needs to be asked is whether or not the size of the drains put under Woodridge Ct. will be able to service the project? It would be reasonable to think not due to the original developer of L.P.R. originally wanting to put a single home on Parcel Q.

73.25

CEQA GUIDELINES- SECTION 15085 NOTICE OF COMPLETION (E)

This section states that public agencies are encouraged to make copies of notices of completion filed for the project pursuant to this section available in electronic format on the internet. To date I have seen only one agencies report. Not having input from all County Departments responsible for the effects a development would have on their areas of responsibility, would not provide a total picture of the effect on land use being proposed to being developed.

73.26

WATER-

The E.I.R. states that the project has a can and will serve letter from American Water. However, it should be pointed out that letter was dated 11/2/15 and states that it is only good for 2 years, making it expired. Should another letter from them be obtained? This also begs the question as to whether or not the project has changed from that date?

73.27

PROJECT DEVELOPMENT-SECTION 4.0 PG. 4-20 THE E.I.R. -OFF SITE DEVELOPMENT

This section states the proposed project doesn't include or require any off site improvements. How therefore do they plan on connecting to the existing sewer and waste water runoff drains on Woodridge Ct. If required, this would also pertain to running new lines under the road.

73.28

SUMMARY

With the addition of additional facts coupled with the pointing our of so many erroneous statements in the E.I.R., this proposed project would have an adverse impact to the functionality and quality of life and scenic beauty that currently exists within the

73.29

development. These facts alone show that a proposed commercial development is not a good fit withing a residential development. It is also important to point out that the claim that this project would be in close proximity to required related services such as hospitals, doctors offices, etc is also not true. The closest hospital is more than 3 miles away. If one examines all of the correct facts and numerous violations of the Las Palmas and Toro AREA specific plans that are not addressed in the E.L.R. i.e. (pg Roman Numerals 11-4#7, pg 11-6#3, pg 11-17#11, pg 111-2paragraph 2 of pg, 111-4and pg a-2#4 that would occur with the development of this project, there isn't any other conclusion that could be drawn than to **DENY THIS PROJECT.**

Tom Mercurio
21001 Country Park Rd.
Salinas, Ca. 93908
805 455 8468

Letter 73

COMMENTER: Tom Mercurio

DATE: April 16, 2018

Response 73.1

The commenter states that they are concerned about the project. The commenter states that the Draft SEIR is biased towards the developer and contains errors. The commenter asks if the Planning Department reviewed the document and supports its claims. The commenter discusses the Draft SEIR process and questions whether or not it is ethical for a developer to pay directly for preparation of a Draft SEIR.

Please refer to Response 38.3.

Response 73.2

The commenter references the LPRSP, which states that higher density housing should be clustered behind natural land forms, generally at lower elevations and not on steeper slopes or ridgelines.

Refer to Topical Response D for a discussion of consistency with the LPRSP. As noted therein, the project is not considered residential, and is generally consistent with LPRSP policies.

Response 73.3

The commenter discusses the project's use of landscaping for view-screening. The commenter states that images 5-6, 5-7, and 5-8 in the Draft SEIR are misleading because they only show certain perspectives. The commenter states that tree removal would increase visibility of the project, and that newly planted trees would not screen the site until many years of growth had occurred. The commenter states that Spreckels Boulevard (Avenue) views would also be impacted.

Spreckels Avenue is approximately 3,700 feet from the project site at its nearest point. The project site could potentially be visible from Spreckels Avenue. Note that the project would not be required to be hidden from view from neighboring roads. Please refer to Topical Response F for more detail regarding scenic resources and landscaping.

Response 73.4

The commenter asks why the project includes a proposed amendment to the LPRSP.

Section 4.0, *Project Description* (page 4-18), of the Draft SEIR, describes the need for a Specific Plan amendment and provides the full text of the proposed amendment. As noted therein, the project falls under the County's general definition of an assisted living facility, which is an allowed use for the project site in the General Plan and the LPRSP. The Specific Plan amendment would serve to clarify the distinction between an assisted living facility and a residence; the distinction is noted in order to confirm that the project would not be subject to the residential limit within the Specific Plan Area. Because the project is already in conformance with the general plan and LPRSP land use designations, the Specific Plan amendment will not create any impacts and therefore does not need to be evaluated within the Draft SEIR.

Response 73.5

The commenter refers to the residential unit limit of 1,031 for the LPRSP Plan Area. The commenter states that the proposed project includes housing that would exceed the limit, because 1,028 homes have already been built.

Regarding the residential unit cap of the LPRSP, refer to Topical Response C. As noted therein, the proposed project is not a residential use under the County code or LPRSP; as such, the residential unit limitation of 1,031 does not apply to the project.

Response 73.6

The commenter asks if the project would necessitate a new fire station, and if the developer would pay for the new station.

Please refer to Topical Response B. As stated therein, Section 11.9, *Public Services,* of the Draft SEIR, has been revised to state that developers in Monterey County are required to pay development impact fees that would go toward fire protection facilities, pursuant to Monterey County's Fire Mitigation Fee Ordinance (County Ordinance Title 10, Chapter 10.80; Monterey County 2019). The Monterey County Regional Fire District reviewed the proposed site plan and building plans and determined that new or expanded fire facilities and additional equipment are not needed in order to provide fire protection services to the project. Therefore, the project would have a less than significant impact with adherence to applicable fire safety codes and design features as approved by MCRFD and payment of the County's Fire Mitigation Fee.

Response 73.7

The commenter states that emergency evacuation of the project site would require use of Woodridge Court Road, which has a minimum width of 27 feet. The commenter asks if Woodridge Court is wide enough to allow two-way traffic and accommodate emergency vehicles.

Please refer to Topical Response D. The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. Furthermore, the existing streets that run through the Subdivision were reviewed and approved for development to ensure accessibility for emergency vehicles when the community was constructed. Additionally, Mitigation Measure T-2 has been added and is described in Section 4, *Amendments to the Draft SEIR,* of this document.

Response 73.8

The commenter states that in the event of an emergency evacuation, the Subdivision roads would be congested with vehicles entering the Subdivision to transport the senior living center residents.

For a discussion of wildfire impacts, please refer to Topical Response B, which includes analysis added to the Final SEIR addressing wildfire hazards. Impacts related to wildfire and fire protection would be less than significant. Please refer to Topical Response D for a discussion of impacts on emergency evacuation and emergency access. The project would not result in a significant impact on emergency preparedness within the Subdivision, and would maintain adequate emergency access routes to the project site.

Response 73.9

The commenter states that the Draft SEIR does not address security operations at the Subdivision entrance. The commenter states that senior living center staff would arrive at 6 am, before security staff arrives. The commenter states that project-generated traffic would congest the Subdivision entrance, including the River Road exit lane.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 73.10

The commenter states that the Draft SEIR traffic analysis does not include emergency vehicles, shuttle service, or senior living center visitors. The commenter states that the majority of the project-generated traffic would occur between 6:00 am and 8:00 pm and would impact the road.

Refer to Response 7.2 for discussion of the Draft SEIR's methodology for estimating trip generation by the project. As discussed therein, the Draft SEIR estimates new trips based on appropriate trip generation rates provided by the Institute of Transportation Engineers. These trip rates provide a reasonable estimate of total trips generated by senior living communities, incorporating typical ancillary trips such as resident trips, visitor travel, truck trips to supply food service and commercial operations, and medical trips.

Response 73.11

The commenter states that pedestrians cross Woodridge Court to access Corey Park. The commenter expresses concern about the mix of vehicles and pedestrians due to project-generated traffic.

Regarding traffic along Corey Park, please refer to Topical Response D. As noted therein, the proposed project would not substantially increase safety hazards for pedestrians and bicyclists, including people accessing Corey Park.

Response 73.12

The commenter asserts that the Draft SEIR underestimates the amount of traffic that would be added to SR 68 because employees on the project site would generate the majority of new trips. The commenter asks if the analysis in Section 9.1 of the Draft SEIR includes a comparison with development of the originally planned single-family home on the project site.

Refer to Response 7.2 for discussion of the methodology for estimating trip generation by the project. As discussed therein, the Draft SEIR estimates new trips on SR 68 and other nearby roadways based on appropriate trip generation rates provided by the Institute of Transportation Engineers. These trip rates account for employee trips generated by senior living communities. Therefore, the Draft SEIR's traffic analysis does not undercount employee trips generated by the project.

Refer to Topical Response D for discussion of the project's impact on traffic conditions on SR 68. As discussed therein, the Draft SEIR acknowledges the project would have a significant and unavoidable impact on traffic conditions on the highway because existing traffic conditions are at an

unacceptable level of service (LOS) F, and the project would worsen these conditions by adding at least one trip during peak hours.

The Draft SEIR's traffic analysis does not compare the project's trip generation to that of the originally planned single-family residence on the project site; rather, it compares new trips to existing baseline conditions. Under this baseline, the project site is undeveloped and does not generate any vehicle trips. This approach is more conservative because it assumes that all new vehicle trips would be additional to baseline conditions.

Response 73.13

The commenter states that the project does not address the County's inclusionary housing requirement. The commenter references a June 2015 letter from County staff that indicates an inclusionary housing requirement for the project.

As noted in Topical Response C, the proposed project is not a residential use under the County code or LPRSP that would be subject to the County's inclusionary housing ordinance. The proposed project would be a licensed Residential Care Facility for the Elderly (RCFE), and would not provide dwelling units that would operate or function as independent units. Provided that the applicant can demonstrate that all units and beds are licensed consistent with the Health and Safety Code prior to occupancy, River View at Las Palmas is not subject to the requirements of the Inclusionary Housing Ordinance. Therefore, the County's inclusionary housing ordinance does not apply to the project.

Response 73.14

The commenter disputes the Draft SEIR's assertion that the project includes rights to the use of Subdivision roads. The commenter refers to the site's Grant Deed language that stipulates a non-exclusive easement for ingress and egress. The commenter expresses the understanding that the grant deed does not allow for the type of traffic that the project would generate.

Please refer to Topical Response I. As noted therein, a written agreement between the LPHOA and the applicant would be necessary in order to clarify cost-sharing associated with use of the streets, drainage facilities, and security operations that are under the control of the LPHOA. Such an agreement is not currently in place. It is outside of the scope of the Draft SEIR to facilitate an access agreement between the applicant and the LPHOA.

Response 73.15

The commenter states that the sewer line serving the Subdivision ends at the end of Woodridge Court, and that the project would need to demolish the road in order to connect the project's sewer line.

Temporary construction impacts may result from the connection of utilities to the project site. Any impacts to the road would be repaired in conjunction with utility improvements.

Response 73.16

The commenter states that due to the Grant Deed restrictions described above, the project would not be permitted to use the Subdivision's stormwater drains. The commenter asks if the Subdivision's stormwater drainage system is capable of handling the volume that would be added by the project.

Please refer to Topical Response E. As indicated therein, a Conceptual Stormwater Control Plan was prepared for the project by Gateway Engineering, Inc. and has been developed for the project as

part of the preliminary design to address stormwater management for the project site in conformance with County and State regulatory requirements. The site drainage is specifically designed to meet County and regulatory requirements, and emulate pre-development conditions, resulting in the water volume, rate and quality of stormwater leaving the site would be similar to current conditions. As a result, there would be no project-related downstream or off-site impacts related to flood hazards or stormwater quality related to project operation.

Response 73.17

The commenter states that Woodridge Court is LPHOA property and that the LPHOA would consider use of the road for project parking to be trespassing. The commenter refers to LPHOA rules that prohibit commercial vehicles from parking on the streets.

As discussed on page 9-8 in Draft SEIR Section 9.0, *Transportation & Traffic*, policy in the LPRSP to provide adequate off-street parking would apply to the project. The project would provide a 28-space parking lot for staff and visitors at the assisted living facility, and a 32-space parking lot for staff and visitors at the memory care facility. These proposed parking lots would provide adequate off-street parking for commercial vehicles. Therefore, it is anticipated that the project would not result in conflicts with LPHOA rules prohibiting such vehicles from parking on streets.

Response 73.18

The commenter states that the Draft SEIR does not address air quality impacts from the project's construction phase, including dust from dump trucks.

Suspended particulate matter emissions (including airborne dust during construction) are discussed in Section 6.0, *Air Quality*, of the Draft SEIR. As described therein, construction of the project would expose nearby residences to particulate matter emissions from the use of off-road equipment as well as large diesel-fueled trucks. Mitigation Measures AQ-1, AQ-2, and AQ-3 are required to reduce this impact to a less than significant level. These three measures require, respectively, the inclusion of dust control measures in the project's grading plan, appointment of a site monitor, and maintenance of equipment for low emissions. For a full description of particulate matter emissions and mitigation measures, refer to Section 6.0, *Air Quality*, of the Draft SEIR.

Response 73.19

The commenter states that the geology and soils reports for the project are from 2014 and should be updated. The commenter states that the building envelope would be near the site of a previous landslide. The commenter states that the rainfall that caused the previous landslide could occur again, and that landslides in this area could result in flooding of homes.

While the Geologic Hazards Report and Soil Engineering Feasibility Investigation (geology and soils report) dated March 2014 is now over five years old, the passage of five years would not substantially change the basic underlying geology of the project site. Additionally, the recommendations of the geology and soils report are premised on the assumption that a qualified engineer will carry out additional design level investigations and review proposed grading, drainage and foundation plans before construction; and a qualified engineer will observe, test, and advise during earthwork and foundation construction. These activities will ensure that all construction activities will be carried out with knowledge of, and taking into account, geologic conditions current at the time of construction.

Please refer to Topical Response E for information regarding landslides. As noted therein, 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, including slope stability and landslides.

Response 73.20

The commenter states that it would take many years for new trees to provide visual screening of the project. The commenter notes that the LPRSP EIR did not discuss the proposed project.

The Draft SEIR for the proposed project refers to the LPRSP EIR to provide context to the project's discussion of aesthetic impacts. The LPRSP EIR is relevant for its discussion of the project site's distance from scenic SR 68, and discussion of the overall aesthetic impacts of development in the area, as the project would add development to the outskirts of the existing Subdivision. However, project-specific impacts are addressed in Section 5.0, *Aesthetics,* of the Draft SEIR.

For further discussion of aesthetic impacts, refer to Topical Response F. As stated therein, impacts to scenic resources and private views would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Response 73.21

The commenter states that the construction of the project coupled with tree removal around the site would result in a significant impact to the view from SR 68, and would also impact the view from Spreckels Road. The commenter refers to a General Plan Policy OS-1.2, which states that development in designated visually sensitive areas shall be subordinate to the natural features of the area. The commenter refers to another unspecified set of policies regarding new development in the Toro Area. The commenter asks if the project would be exempt from policies related to aesthetics.

Visual impacts are discussed in Topical Response F and the project's consistency with General Plan Policy OS-1.2 is discussed in Table 3-1 in Topical Response C. As noted therein, the project site is located within an area designated "sensitive viewshed." Section 5.0, *Aesthetics*, of the Draft SEIR included visual simulations from SR 68 and from Reservation Road. The simulations show that although the project would be visible from these locations, the project is not located on steeper slopes and would not constitute ridgeline development. Mitigation measures ensuring the impacts are less than significant are: 1) requiring a landscape plan to screen the project site from SR 68, Reservation Road, and River Road, as well as from the adjacent neighborhood and trail; 2) building colors and materials to be earth toned to blend with the existing vicinity landscape; and 3) requiring all new utility and distribution lines on the project site to be underground.

Response 73.22

The commenter disputes the Draft SEIR's characterization of the proposed senior living center Casitas units as non-residential. The commenter states that the Casitas would be independent living units, and notes that a casita is, by definition, a small home. The commenter states that the project should be considered to represent a population increase. The commenter asks if an expansion of the facility would represent growth inducement.

The casitas would not be independent (residential) living units; the entire project is an assisted living facility, including the casitas.

Please refer to Topical Response C regarding growth inducement. As stated therein, while the proposed project would indirectly result in business and population growth due to the increased local investment from revenues generated by the project, projections of any potential growth would be speculative.

Response 73.23

The commenter states the proposed Casitas should be counted towards the LPRSP limit of 1,031 total homes in the Plan Area, and that the project would exceed the limit.

Refer to Topical Response C. As noted therein, the proposed project is not a residential use under the County code or LPRSP; as such, the residential unit limitation of 1,031 does not apply to the project.

Response 73.24

The commenter disputes the Draft SEIR statement that the project applicant is paying LPHOA fees.

The applicant pays LPHOA fees. Several commenters acknowledge that the applicant makes payments to the LPHOA but contend that those payments do not represent membership status.

Response 73.25

The commenter reiterates the concerns described in comment 73.16.

Please refer to Response 73.16.

Response 73.26

The commenter inquires as to the availability of public agency comment on the project.

The Notice of Completion (NOC) for the Draft SEIR was filed with the State Clearinghouse on March 12, 2018 (https://ceqanet.opr.ca.gov/2017031025/2). All agency and public comments received on the Draft SEIR are included in this Final SEIR and referred to herein.

Response 73.27

The commenter states that the Can and Will Serve Letter from American Water is from 2015 and is no longer valid.

See updated will-serve letter from California Water Service dated March 26, 2019 in Appendix I-2

Response 73.28

The commenter refers to the EIR statement that the project does not include off-site improvements, and asks how, therefore, the project would connect to sewer and wastewater infrastructure.

Section 10.0, *Water Supply*, and Section 11.12, *Wastewater*, of the Draft SEIR state that California Water Service will provide water and wastewater services to the project site, and has provided a "can and will serve" letter regarding the project. No construction of new water treatment, storage, or distribution facilities would be required, including off-site improvements mentioned by the commenter.

Response 73.29

The commenter summarizes their opposition to the project, stating that there would be impacts to functionality and quality of life and scenic beauty within the Subdivision. The commenter states that the claim that the project is in close proximity to medical services is incorrect, and notes that the nearest hospital is more than three miles from the project site.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR, and proximity to a hospital is not an environmental issue. The proposed location offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access. Salinas Valley Memorial Healthcare is approximately five miles from the project site.

Please refer to Topical Response C. As described therein, quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

From: Suzanne Snyder Date: 4/16/18

Address: 21076 Country Park Rd

Letter 74

RECEIVED
APR 19 2018
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Carl Holm, Planning Director, (831) 755-4879, same physical address
holmcp@co.monterey.ca.us

roygobets@aol.com , Roy Gobets (831) 235-1701 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Joe,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. 74.1

I respectfully urge the developer to find alternate venue and access for his proposed facility.

Please respond to the issues I listed above in writing.

Respectfully,

x Suzanne Snyder
21076 Country Park Rd (I am a long term resident)
We are paying for and have paid for the above by purchasing the open area in front of the Cary house and establishing a gated community. This proposed development would eliminate what we have established.

Letter 74

COMMENTER: Suzanne Snyder

DATE: April 16, 2018

Response 74.1

The commenter states that the project would pose traffic, safety, and security problems, and that the project is inconsistent with the Subdivision's residential atmosphere. The commenter urges the developer to find an alternate venue and access for the project.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

Topical Response D explains that a new access route to the project site would not be necessary to avoid impacts on traffic circulation because the level of service on roads providing access to the project site would remain acceptable under the project.

April 17, 2018

Letter 75

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place
Salinas, CA 93901

Re: RVLP Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr. Sidor,

My name is Megan Castillo and my family and I reside at 21005 Country Park Road in Las Palmas 1. I am writing to express my opposition to the proposed development of Riverview at Las Palmas. We purchased our home in 2011 and were thrilled to become part of the Las Palmas 1 community. For over 7 years we have enjoyed the peaceful and safe neighborhood where our children can ride their bikes and explore the beautiful nature around us. I am deeply concerned by three areas in particular:

1. Traffic/Safety

My understanding of the project, once constructed, is that there would be a host of people entering and exiting this property at all hours of the day via Woodbridge Road. This is a space where my children have learned to ride their bikes, where my neighbors walk their dogs and interact with one another, and that we enjoy watching the sun set over each day. My home is one door down from this road and I would be terrified to leave my children outside to play for fear that they may be in danger of being hit by a car driven by any number of people coming in or out of this facility, including service vehicles, emergency vehicles, staff, family visitors, etc. I do not anticipate that our speed limit will be followed in emergency situations nor by an employee trying to get to work on time. People must cross this road to access the development's largest open space, Corey Park, and dodging vehicles coming through is unacceptable. 75.1

In addition, I also already fear what a mass evacuation would look like in our area should a fire break out in the hills behind our homes or a mudslide occur. This will be a single-entry point for the entire facility to be evacuated, which I feel further jeopardizes the safety of all.

I anticipate that any emergency vehicles responding to this facility will have their sirens and lights on and I feel this would be a disruption to my family's sleep and general sense of well-being. Prior to residents actually being there, the construction of the facility itself would be so incredibly disruptive to our daily lives with all the necessary equipment and materials going in and out through this single-entry point.

2. Security

We currently have a security protocol in place where any guests of our neighborhood are checked in my one single guard at Las Palmas Road. If this facility were to be constructed, it would be impossible for this single guard to have to check in every service vehicle, guest, healthcare provider, or other visitor to this facility. As this would be a 24-hour care facility, there will be no one to ensure visitors are being checked in properly during the hours our security guard is not on duty. I feel this poses a threat to the general safety of our neighborhood as once they enter the LP1 property they are not accounted for. 75.2

3. Residential Area

This area was zoned for residential purposes and the proposed facility is a direct contradiction to this. I do not understand why the developer's project is being considered given the scope of the plan. This is clearly not a plan to build residences as was originally set forth for this area. 75.3

I appreciate you taking the time to consider my concerns and hope the decision will be made not to allow this project to proceed.

Regards,

Megan Castillo

Megan Castillo, Homeowner
21005 Country Park Road

Letter 75

COMMENTER: Megan Castillo

DATE: April 17, 2018

Response 75.1

The commenter states that the project would increase traffic through the Subdivision, which would endanger children playing outside.

For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision.

Response 75.2

The commenter states that increasing traffic in the Subdivision would compromise the existing security checkpoint, because the security guard would not be able to check-in all of the visitors. The commenter states that when the security guard is off-duty, unaccounted-for visitors would enter the Subdivision, posting a general safety threat.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 75.3

The commenter states that the Subdivision is zoned for residential purposes, and that the proposed project is an inappropriate land use for the site.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Letter 76

From: Lan Clayton
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; roygobets@aol.com
Subject: RVPL Draft SEIR for proposed development of Riverview at Las Palmas (PLN#150372)
Date: Tuesday, April 17, 2018 8:02:48 PM

Dear Mr. Sidor,
I would like to voice my concerns about the project proposed in Las Palmas I.

My first concern is that the large scale construction project will bring a tremendous amount of heavy equipment through our quiet neighborhood. I believe this will be not only a nuisance, but potentially dangerous as well when trucks and cars back up onto River Road trying to get past the gate house. 76.1

Next, it is my understanding that the project aims to cut gown many of the trees on the hill top. I enjoy looking up at the surrounding hills to see the cows, grasslands and eucalyptus grove. This project would destroy the natural beauty with its large buildings, cars, and 24 hours lighting. 76.2

Finally, I imagine the ongoing traffic once the project is completed would be intolerable. I ride my bike out onto River Road and walk my dog around the neighborhood. The backup of cars from workers, residents, family members, delivery persons and emergency vehicles would put my safety and the safety of my neighbors on the line. 76.3

Please respond to the concerns that I have listed above in writing.

Respectfully
Lan Clayton
17515 Sugarmill Rd
Salinas Ca 93908
Lanclayton@comcast.net

Letter 76

COMMENTER: Lan Clayton

DATE: April 17, 2018

Response 76.1

The commenter expresses concern that construction of the project will result in traffic safety issues because cars and trucks will congest the Subdivision entrance.

Please refer to Topical Response D. As described therein, the project would not result in a significant impact related to traffic safety.

Response 76.2

The commenter states that the project would remove eucalyptus trees and destroy natural beauty.

Regarding aesthetic impacts, please refer to Response 30.2 above and Topical Response F. As stated therein, impacts to scenic resources and private views would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

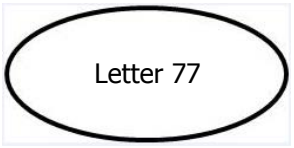
Tree removal and impacts to wildlife are discussed in Topical Response G and Section 7.0, *Biological Resources,* of the Draft SEIR. As noted in Topical Response G, impacts to common wildlife species would not be considered significant under CEQA.

Response 76.3

The commenter states that the project would result in intolerable traffic, and that the added traffic would present safety concerns Subdivision residents.

Please refer to Topical Response D. As described therein, the project would not result in a significant impact related to traffic safety, and impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

From:	Joseph Goncalves
To:	Sidor, Joe (Joseph) x5262
Cc:	Swanson, Brandon xx5334; roygobets@aol.com
Subject:	Letter for proposed Development of Riverview at Las Palmas
Date:	Tuesday, April 17, 2018 5:20:07 PM



Hello Mr. Sidor

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security
problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, is inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. 77.1

We don't want a commercial business built within our neighborhood boundary.
Businesses make profit, homes do not.
Home values will go down. 77.2

Removal of 80 Eucaliptus trees.Light pollution.
Noise pollution during 2 year plus construction phase. Road up hill is 50% grade.
Water resources and California drought. 77.3

I strongly urge Mr Shingu, the developer, to fin alternate location and access for this proposed faclitty. 77.4

Please respond to the issues I listed above in writing.
Respctfully,
Joseph A. Goncalves
17655 Riverebend Rd.
Salinas, CA 93908

Letter 77

COMMENTER: Joseph A. Goncalves

DATE: April 17, 2018

Response 77.1

The commenter states that the project would pose traffic, safety, and security problems.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 77.2

The commenter states that as a commercial use with a large number of housing units, the project is inconsistent with the Subdivision's residential atmosphere, and will decrease property values of existing homes.

Please refer to Topical Response C for a discussion of land use compatibility and property values. As described therein, the project would be consistent with the site's zoning and land use requirements, and property value is not an environmental impact and therefore is not analyzed in the Draft SEIR.

Response 77.3

The commenter states that the project would remove 80 eucalyptus trees and cause light and noise pollution. The commenter mentions water resources and drought. The commenter states that an unspecified road has a 50 percent grade.

The comment concerning road grade does not provide sufficient detail for a response. However, road gradients are typically less than ten percent, and the existing Subdivision roads are not drastically steeper than typical roads.

Water resources are discussed in Section 10.0, *Water Supply*, of the Draft SEIR. The Draft SEIR concluded that impacts would be less than significant, based on the ability of the California Water Service to provide water services to the project per the "can and will serve" letter.

Tree removal and impacts to wildlife are discussed in Topical Response G and Section 7.0, *Biological Resources,* of the Draft SEIR. As noted in Topical Response G, impacts to common wildlife species would not be considered significant under CEQA.

Please refer to Topical Response F, which discusses impacts of the project's lighting. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 77.4

The commenter urges the developer to find an alternate location and access for the proposed project.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classifications, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

Please refer to Topical Response D. As noted therein, secondary access between River Road and the project site during emergency evacuations would be available through the lawn area between County Park Road and Woodridge Court. However, secondary access would not be provided on Woodridge Court between Country Park Road and the first internal parking lot aisle. Mitigation Measure TRA-3 would be required to install improvements that improve access to the lawn area and Woodridge Court. With implementation of this measure, the project would have a less than significant impact on emergency access.

Letter 78

From: nancysidney60@aol.com
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103; roygobets@aol.com
Subject: RVPL Draft SEIR
Date: Tuesday, April 17, 2018 10:09:51 AM

Dear Mr Sidor,

My name is Nancy Montana. I retired in 2003 from Apple Computer after an extended career in electronic sales and purchasing.

My husband and I chose to live in Las Palmas I because of its beautiful, quiet setting and safe atmosphere.

We live near our grandchildren who play and bike in the safe streets in our community. We enjoy the parks. We treasure where we live.

I am now very concerned about the proposed project. It planned use of Las Palmas 1 roads will bring unacceptable traffic, safety and security problems in our peaceful neighborhood. 78.1

The large size and its clear commercial use are not consistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. 78.2

I respectfully urge the developer to find alternate location and access for his proposed facility. 78.3

It does not belong here and we count on the Board of Supervisors to honor the plan they approved that resulted in Las Palmas I. Please do not approve this project.

I look forward to your written response.

Respectfully,

Nancy Montana

21056 Country Park Road

Salinas, CA, 93908

Letter 78

COMMENTER: Nancy Montana

DATE: April 17, 2018

Response 78.1

The commenter states that the project would bring unacceptable traffic, as well as safety and security problems, to the Subdivision.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 78.2

The commenter states that due to the project's size and commercial use, it would not be an appropriate land use in the residential Subdivision.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 78.3

The commenter urges the developer to find an alternate location and access for the project, and asks the Board of Supervisors to deny the project.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Letter 79

From: yukiko yonemitsu
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103
Subject: RVPL draft sir for proposed development of Riverview at La Palmas(PLN#150372)
Date: Tuesday, April 17, 2018 10:51:50 PM

Hello Mr. Sidor,

I am very concerned about the proposed project. I understand that there are not enough senior homes in Monterey County. So I am not against building it. However, it should have its own access so whoever go to there wouldn't need to use Las Palmas 1 Road. There would be unacceptable traffic, safety and security problems. It shouldn't affect any Las Palmas residents who located here first. Please imagine that if you lived in Las Palmas1. 79.1

Respectfully,

Dennis and Yukiko Yonemitsu
17700 Riverbend Rd.
Salinas, CA 93908

Letter 79

COMMENTER: Dennis and Yukiko Yonemitsu

DATE: April 17, 2018

Response 79.1

The commenter states that the project should have a separate access route, rather than use the Subdivision roads. The commenter states that the project would cause unacceptable traffic, safety, and security problems.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Topical Response D explains that a new access route to the project site would not be necessary to avoid impacts on traffic circulation because the level of service on roads providing access to the project site would remain acceptable under the project.

April 18, 2018

Mr. Joseph Sidor, Associate Planner
Mr. Brandon Swanson, Planning Manager
Monterey County Planning Commission

Letter 80

Mr. Sidor and Mr. Swanson,

I am a resident of Las Palmas I. I am opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372) because the proposed non-residential development is inconsistent with the existing residential community, and the development would create traffic, security and safety issues that would have a strongly negative impact on quality of life of Las Palmas I residents. 80.1

1. Traffic

This project would impact both the Las Palmas I neighborhood and roads in the surrounding area. 80.2

Las Palmas I is a quiet, rural community where children play, families ride bikes and walk their dogs. Community streets are narrow and designed for residential traffic. On several streets parking is limited to one side of the road. There are two entrances to Las Palmas I; however, non- resident traffic is limited to the Las Palmas Road entrance.

Construction of this project would result in deliveries, probably dozens in any day, of construction equipment and supplies for an extended period of time. (It is not unrealistic for construction to take 12-18 months.) If the project is completed, traffic would be further congested by the numerous employees (Estimated staffing level is 92 employees at any given time.) and commercial vehicles - food deliveries, linen services, medical and emergency services, and waste and removal required to support the facility. This traffic load would cause traffic to dangerously back up at the Las Palmas Road gatehouse and unto River Road.

The additional traffic coming into Las Palmas I would also impact the already congested Highway 68. Highway 68 is designated as a Level F highway. This is the current situation and two already approved County Highway 68 construction projects have not yet been built. Approval of the proposed non - residential project will only the exacerbate the problem and add to commuter misery.

2. Security.

Safety and security of our families is a high priority. To this end residents have chosen to limit access by installing gates and hiring a security guards to monitor incoming traffic. The proposed large non-residential facility would open our community to continual traffic throughout the day and night. There would be no way to regulate this traffic or the use of our private streets, parks and playgrounds and guarantee the safety and security of the community. 80.3

3. Safety

As mentioned above our roads are narrow and there are only two entrances/exits to the property. There is concern that large construction trucks and emergency vehicles will have difficulty maneuvering the tight turns onto Woodbridge Court and the proposed road leading up the hill to the non-residential 80.4

facility. Evacuation of the facility in the case of an emergency would be very time consuming and therefore pose danger to residents of both River View at Las Palmas and Las Palmas I.

4. The Proposed Non-Residential Development is Inconsistent with the Existing Residential Community

The Las Palmas Plan and Monterey County Plan was approved and developed as a residential neighborhood. The parcel of land on which the developer plans to build a large residential care and nursing facility is zoned "medium density residential," at 2.61 units per acre. Under the Las Palmas Plan this parcel was specifically approved for eight units total. The developer is requesting a "conditional use permit" to allow for the development of a non-residential facility with a total of 105 units. Clearly this is not in keeping with the Las Palmas and Monterey County Plans. 80.5

The developers are also requesting an amendment for a non-residential use. Their reasoning is that assisted living facilities are not considered residential units because they do not operate in the same manner as an independent residential unit and should not be held to the residential limitations of the Las Palmas Plan.

It seems to me that the need for a "conditional use permit" and the developers acknowledgment that the project is not residential, whereas Las Palmas I IS a residential community, that the proposed project is inconsistent with the Las Palmas and Monterey County Plans. I request that the Planning Commission consider how, in light of this inconsistency, the adverse impact on the quality of life of Las Palmas I residents, the traffic impact on the greater community, and the potential safety concerns of future residents of the assisted living facility, this proposed project benefits Monterey County. This proposed non- residential development should not be approved. 80.6

I also request that prior to the Planning Commission meeting that the Commissioners conduct an official site visit to Las Palmas I and the area under consideration.

Thank you for your consideration.

Respectfully,

Lynn Dittrich
17570 Winding Creek Road, Salinas, CA 93908
831-595-0368

Letter 80

COMMENTER: Lynn Dittrich

DATE: April 18, 2018

Response 80.1

The commenter states that the project is inconsistent with the existing residential community, and would create traffic, security, safety, and quality of life issues.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response C for a discussion of land use compatibility and quality of life. As described therein, the project would be consistent with the site's zoning and land use requirements, and quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

Response 80.2

The commenter states that both construction and operation of the project would result in traffic impacts, including dangerous congestion at the Subdivision entrance. The commenter states that the project would exacerbate LOS F conditions on SR 68.

Topical Response D for a discussion of traffic impacts. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

Response 80.3

The commenter states that the project would compromise security operations at the Subdivision entrance.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision. Regarding the Subdivision's private security service, refer to Topical Response I, which discusses the project applicant's responsibility to share in the LPHOA's security costs.

Response 80.4

The commenter states that the Subdivision has only two entrances/exits and that the roads are narrow, which could result in difficult maneuvering for large construction trucks and emergency vehicles. The commenter notes the tight turns onto Woodbridge Court. The commenter states that efficient evacuation of the facility would be challenging, thus posing a danger to its residents as well as the Subdivision residents.

Please refer to Topical Response D for a discussion of site access and evacuation routes. As noted therein, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic

impacts. Additionally, mitigation is required to improve emergency access and evacuation to and from the site.

Response 80.5

The commenter states that the proposed project is inconsistent with the existing residential community. The commenter states that the project would not be consistent with the site's zoning and would include more housing units than the site is meant to contain. The commenter states that the need for a conditional use permit suggests that the project is an inappropriate land use.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 80.6

The commenter requests that the Planning Commission members visit the project site and consider whether or not the project would benefit the County.

The commenter's recommendation is noted and herewith shared with County decision makers for their consideration.

From: Alan & Chris Bockenstedt 4-16-18
17556 River Run Road
Salinas, Ca

Letter 81

RECEIVED
APR 19 2018
Monterey County RMA

To: Joseph Sider
Associate Planner
Monterey County RMA- Planning
Second Floor 1441 Shilling Place
Salinas, Ca

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas(PLN# 150372)

Joseph

Hello, this is Alan & Chris Bockenstedt. We live at 17556 River Run Road which is right inside the gate at Las Palmas 1. If you look at where our house is located you will be able to see our concern with this project. The sidewalk is across the street from our house. We have grandkids and their friends which are at our house all the time. We're concerned with the amount of traffic that will come with this new development both with construction and continuing operation of a 24 hour facility. 81.1

We bought this home in April of 2017 because of the location and the fact that it had security and a limited amount of traffic within the existing community. If this proposed facility gains your approval to build, we would lose all of the qualities for which we originally purchased our home. 81.2

Besides the safety and security issues created, the noise levels will increase substantially.

For these reasons and many more which other people have brought forward, we would urge you to not grant a permit to go forward with the Parcel Q project.

Respectfully,
Alan & Chris Bockenstedt
Al Chris Bockenstedt

P.S. At the time of our home purchase, nothing was disclosed to us about the proposed development. We are hoping that our investment in a home in Las Palmas 1 does not erode with this project going forward.

1556
our home
Google
1439

Our home
1155L
Google
36°37'16"N 121°40'16"W 2,170 ft

Letter 81

COMMENTER: Alan and Chris Bockenstedt

DATE: April 19, 2018

Response 81.1

The commenters express concern that the project would increase traffic in the Subdivision.

For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision.

Response 81.2

The commenters state that the project would result in impacts related to quality of life, safety, security, and noise. The commenter urges denial of the project.

Please refer to Topical Response C. As described therein, the project would be consistent with the site's zoning and land use requirements. Further, property value and quality of life are not environmental impacts and are not directly analyzed in the Draft SEIR. Safety, security, and noise are discussed in Topical Responses A and H.

The commenter's preference for project denial is noted and herewith shared with County decision makers for their consideration.

Letter 82

17503 Sugarmill Road
Salinas, CA 93908
April 19, 2018

Joseph Sidor, Associate Planner
Monterey County RMA-Planning
Second Floor
1441 Schilling Place
Salinas, CA 93901

Dear Mr. Sidor;

I write to you today to express my concern over RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372).

I have owned my home in Las Palmas 1 since November, 2006. It is a peaceful and safe community consisting of a good mix of young families as well as senior citizens. I am worried that this proposed development will upset the balance of a well-established residential community that has existed for nearly 25 years. 82.1

My concerns are as follows:

- It appears on the surface that this proposal is a commercial endeavor which is not in keeping with the zoning and aesthetic nature of the area. 82.2
- This project will increase the traffic flow on Las Palmas roads as well as on River Road creating traffic as well as possible safety issues. 82.3
- The size of the project with its employees and residents would make it impossible to maintain the security and serenity of our community. 82.4
- I cannot imagine how the developer could possibly hope to blend his proposal with the surrounding area environment. It would be visible for miles from River Road as well as from Highway 68. 82.5
- California is already in a water crisis. This project would certainly tax local water resources to their limit and exasperate the current salt water intrusion problem. 82.6
- The current waste water plant is barely keeping up with current demands with neighbors complaining about the foul odor coming from the plant. Cal-Water says that it can accommodate the new demand by expanding the current facility. Does that mean that current residents would have to help pay for this plant expansion?
- I am concerned about the integrity of the proposed site. There is a history of landslides in the area. Is placing a facility for patients with Alzheimer's and other debilitating ailments on this site a good idea? 82.7

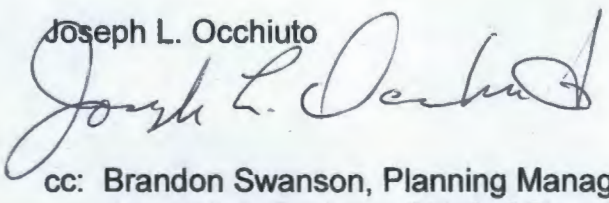
- Evacuation of patients under any conditions, especially a disaster such as fire, earthquake, landslide, etc., would be cumbersome and dangerous under the best of circumstances. 82.8
- Patients/residents of this facility would need medical care which is not immediately available in this area. In a medical emergency immediate treatment is certainly necessary. The nearest hospital and emergency care facilities are a distance away. 82.9
- The construction alone would disrupt our community for a year or more with noise as well as the coming and going of large construction equipment on roads that were not built to withstand that type of traffic. 82.10

I am certain that there are many issues not covered in my letter and I request that you consider all of them before granting the developer's request. I am sure that there are other locations more suitable for this project.

Thank you in advance for your consideration of these issues, and if possible, I would appreciate a response to my letter.

Respectfully yours,

Joseph L. Occhiuto



cc: Brandon Swanson, Planning Manager
Jacqueline Onciano, Chief of Planning
Carl Holm, Planning Director
Roy Gobets

Letter 82

COMMENTER: Joseph L. Occhiuto

DATE: April 19, 2018

Response 82.1

The commenter expresses concern that the project could upset the balance of the Subdivision community.

The commenter's concern is noted and herewith shared with County decision makers for their consideration. Please refer to Topical Response C for a discussion of land use compatibility, property value, and quality of life.

Response 82.2

The commenter states that as a commercial project, the project is not consistent with the site's zoning.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 82.3

The commenter states that the project would increase traffic in the Subdivision and on River Road.

For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision. As stated therein, the project would result in LOS C traffic conditions on River Road, which would be acceptable.

Response 82.4

The commenter states that the project would compromise security and serenity in the Subdivision.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision. Regarding the Subdivision's private security service, refer to Topical Response I, which discusses the project applicant's responsibility to share in the LPHOA's security costs.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 82.5

The commenter states that the project would be visible from River Road and SR 68, and would not blend with the surrounding environment.

Please refer to Topical Response F regarding scenic resources and private views. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Response 82.6

The commenter states that California is in a water crisis, and that the project would tax local water resources to their limit and exacerbate salt water intrusion.

The California Water Service, Monterey County Water Resource Agency (MCWRA), as well as water users have made great strides in reducing consumption, improving efficiency and implementing measures to improve groundwater reliability. Based on these combined efforts, and other considerations addressed in its Urban Water Management Plan, California Water Service projected that, under all hydrologic conditions, its groundwater supply for the Salinas District will fully meet future demands through 2040 (2016 California Water Service). As a result, California Water Service has committed to serving the project in its will-serve letter dated March 26, 2019 in Appendix I-2. In addition, the WCWRA continues to evaluate and implement projects to address seawater intrusion. As indicated in the Draft SEIR, Section 10.0, *Water Supply*, page 10-13, impacts to water supply would be less than significant. As a result, the project would not exacerbate salt water intrusion.

Please also refer to Response 3.3 and 3.4 regarding water supply and conservation efforts, and Response 8.25 regarding MCRWRA's report on seawater intrusion impacts and recommendations.

Response 82.7

The commenter states that they are concerned about the integrity of the proposed site because the area has a history of landslides. The commenter questions the decision to place patients with Alzheimer's disease and other debilitating ailments at the site.

Please refer to Topical Response E. As noted therein, 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, including slope stability and landslides.

Response 82.8

The commenter states that emergency evacuation of the proposed development would be dangerous.

Please refer to Topical Response D. The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project.

Response 82.9

The commenter states that the residents of the proposed project would not be in proximity to medical facilities.

The proposed location offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access. Salinas Valley Memorial Healthcare, the nearest hospital to the project site, is approximately five miles from the project site. For further discussion of the project's siting and land use compatibility, refer to Topical Response C.

Response 82.10

The commenter states that the project would result in traffic and noise impacts.

Please refer to Topical Response D and Topical Response H, which summarize the project's traffic and noise impacts. As described therein, traffic and noise impacts would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

From: Marilyn
To: Sidor, Joe (Joseph) x5262
Subject: Parcel Q
Date: Friday, April 20, 2018 8:05:29 PM

Letter 83

Mr. Sidor,

We have been residents of Las Palmas l Park Side since it was built in 1989. This community was and is a sanctuary for birds, small animals, birds of prey, deer and mountain lions and bob cats. To infringe even more on their lands is not something Monterey county should encourage. 83.1

Secondly, the traffic generated by this 24 hour facility will cause congestion at the light at Las Palmas to River Road that will put 50 shift workers on to River Road at one time being funneled through this family oriented neighborhood causing delays for the people who live here in Las Palmas but also causing delays to the residents of all of the River road communities such as Las Palmas ll and Indian Springs, the farmers and field workers as well as trucks and farm equipment that use River Road, and the schools, teachers and buses that need to get to work or school every day and get home again in a timely manner. This does not include the delivery trucks, ambulances, visitors, etc. that will also use this light. This will happen 3 times a day! The red lights are frequently run and collisions and deaths have happened recently and this will be compounded by the additional volume of traffic. 83.2

This project must have it's own access to River Road as it will cause congestion and noise of idling cars in our neighborhood where people routinely enjoy walking, biking, dogs in the parks, children playing. It will compromise the security of our neighborhood which was set up because our neighborhood was targeted by thieves and the guard gate would no longer be effective. Delivery trucks and ambulances or fire trucks roaring through our neighborhood is not an option as this facility would have a lot of these occurrences. 83.3

The other matter involves the instability of the hillside that the complex would be built on. It has experienced slides whenever there is a normal or heavy rain season. There are homes at the base of the hill and any potential for slide would be disastrous. 83.4

Not only do we feel that this facility should not be built here, we feel the traffic problems will be insurmountable if the entrance to Las Palmas is used and the families here will be negatively impacted. Our peaceful quiet community where children frequently play in the street will be gone. 83.5

Fred and Marilyn Adams
21159 Old Ranch Ct

Sent from my iPad

Letter 83

COMMENTER: Fred and Marilyn Adams

DATE: April 20, 2018

Response 83.1

The commenter states that the Subdivision is a sanctuary for wildlife, and that wildlife habitat should not be infringed upon.

Please refer to Topical Response G. As described therein, the project's impacts related to wildlife would be limited due to the size and placement of the project site. To reduce potential impacts to special status wildlife species, the Final SEIR includes mitigation measures, as listed in Section 4, *Amendments to the Draft SEIR*.

Response 83.2

The commenter states that the project would congest traffic at the Subdivision entrance, as well as throughout the area.

For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision.

Response 83.3

The commenter states that the project should have its own access route from River Road, because using the Subdivision entrance would result in traffic, compromised security, and noise impacts.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Topical Response D explains that a new access route to the project site would not be necessary to avoid impacts on traffic circulation because the level of service on roads providing access to the project site would remain acceptable under the project.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 83.4

The commenter expresses concerns about landslides from the project site damaging homes at the base of the hill.

Please refer to Topical Response E. As noted therein, 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, including slope stability and landslides. In addition, the project includes on-site stormwater control measures designed to achieve zero net increase in the rate of stormwater discharge relative to pre-project conditions. This

would reduce the potential for runoff from new development to exceed the capacity of storm drainage facilities and contribute to off-site flood hazards.

Response 83.5

The commenter states that the project would result in traffic impacts and would disrupt quality of life in the Subdivision.

For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision.

Please refer to Topical Response C. As described therein, quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

RECEIVED
APR 23 2018
MONTEREY COUNTY
PLANNING DEPARTMENT

Letter 84

Alan and Myra Anthony

21028 Country Park Road
Salinas , CA 93908
Phone: 831 206-5430 or 831 277-0245
anthoae2@gmail.com

April 20, 2018

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Shilling Place
Salinas, CA 93901

CC: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us
Roy Gobets, 21056 Country Park Rd, Salinas CA 93908 roygobets@aol.com

Subject: RVLP Draft SEIR Proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr Sidor,

My husband and I moved to Salinas November 2011 from King City. We chose Las Palmas1 for several reasons.

Quiet, Managed, Residential, Secure Community

Due to work and family we have specific needs which were met by Las Palmas 1.

The primary reasons are Safety, Peacefulness and the close sense of Community. The Security of Las Palmas 1 made a big impact on our decision. Due to incidents that have happened in my life, I have never felt safe living anywhere until now. If this Proposed Project goes through, the feeling of safety will be taken away. 84.1

Essential Needs and Unhealthy Disruptions

We live on Country Park Road. Our home backs right against the hill on which the Planned Project will be built. Our Privacy will be disrupted by bright lights necessary for infirm patients also, staff, patients and visitors will look down into our home taking away our privacy. Further the daily noise of these business operations plus the constant vehicular traffic including Emergency Service Vehicles will be disruptive. The vehicles will have to drive up a hill, so there will also be the noise of the large commercial supply and support vehicles shifting gears. My husband along with other residents work various shift hours. His rest time will be heavily impacted. With every day being "Visitor Day" traffic will be heavy with all the vehicles driving back and forth during the day and evening and 84.2

PLN150372

the Emergency Services Vehicles will have to run with "Lights and Sirents". There will be constant sound and airborne dust.

Zoning Change to a Destructive Project - No adequate Process

If this Proposed Project goes through, the feelings of safety and privacy will be taken away. If we had known about the Development being planned, we would not have moved to Las Palmas 1. We would have either remained in King City or looked in other areas off of River Road. With the Development Project, even if we wanted to move, we will be unable due to the decreased value of our home once the Project is Approved. Therefore we should be compensated.

84.3

Other Serious Issues: (Traffic, Noise, Airborn Dirt, Privacy and Security)

If Development Project is approved, Traffic,Security, Privacy and Noise level will be affected. It has been estimated, minimum of 300 vehicles will be driving through the Front Gate, which doesn't include vehicles of Residents and Visitors of people living in Las Palmas 1. I believe estimate is low. **No study of internal traffic has been done.**

84.4

Employees could be hired for 4 and 8 hour shifts. Vehicles could include but not limited to Physicians, Medical Practitioners, Nurses, along with other Medical Professionals checking on Residents and Patients. Assigned Services along with Taxis and Uber could be used for transporting Planned Project Residents to Doctor Appointments, Shopping and other needed errands. Other vehicles but not limited to Pharmacy Delivery, Food, Janitorial, Linen, Appliance, Furniture, Medical Supplies, Plumbers, Electricians, Repairmen, Cable, Telephone Services will be driving through on a daily basis. Many people are ordering more goods through the mail, including food so there would be more types of delivery vehicles such as UPS, Fedex and USPS needing additional access. USPS has a contract with Amazon, where they deliver only for Amazon on Sundays due to the increased orders. Emergency Vehicles which include but not limited to Ambulance, Fire and Police Department will also be needed on a regular basis. The Emergency Service Vehicles alone are going to be very disruptive. With Sirens going off day and night, most likely everyday. The additional amount of vehicles driving through the Front Gate of Las Palmas 1 could affect Emergency Services Vehicles getting to Las Palmas 1 Residents and Planned Project Residents in a timely matter, causing life threatening situations and possible deaths. The Entrance Gate and access roads going to the Planned Development was not designed for this amount of traffic especially during constructon.

Resident Personal and Property Risks to Increase.

Security is going to be a huge problem. The Employees, Residents of Planned Development, Visitors and Drivers can easily wander the premises to use Parks and Walking Trails which the Residence of Las Palmas pay for upkeep. Sadly, there will be some people entering Las Palmas 1 who have other intentions than visiting Planned Project Residents and working. Most likely crime and possible physical assaults could be a problem. It is going to be hard to know if people coming through The Front Gate are here to work or visit Residents of the Development Project or just obtaining access to Las

84.5

Palmas 1. Residents of Las Palmas take great pride in keeping premises clean.There could be garbage thrown within the Community along with the need of additional cement garbage cans which not only would be expensive to purchase but also to upkeep along with being unsightly. The current garbage cans have been strategically placed so they flow with the Communities Landscaping. 84.6

Much Higher Living Costs

Security will need to be increased just to keep some control of crime. The County Sheriff's evening shift Officers are limited to only a few with Jail duties taking precedence. So, our existing Neighborhood Watch will have limitations. 84.7

One Security Guard during the day and night patrols will no longer be able to maintain the Safety, Security and the Rules of Law at Las Palmas. The Security Guard Shack was not built for more than one Guard. We will need a larger staff with three or four Security Guards during the day and possibly two or three the evening shift. The hours of operation at the Guard Shack need to be increased, needing 24 hour Security. In order to handle the extra vehicles, two Security Guards at the Front Gate from 6am to 7pm, then one Security Guard from 7pm to 6am. To protect Las Palmas 1, we will need Security driving and checking the premises of Las Palmas 1 during the day. Two Security Guards may be needed to drive around during the day in order to enforce the Security and Privacy of Las Palmas Residence. A Security Guard will be needed at night besides the Security Guard at the Front Gate. If the Planned Development is approved, we should be prepared to have two Security Guards driving and securing the premises at night in the event crime increases and nonresidential people are wandering the Community. I also have a concern, what legal rights do we have if there are people who are not Las Palmas Residents wandering in Las Palmas 1 Community and will Law Enforcement back the Security Guards when there is a problem?

Zoning Change for a large Health Support Business - Unjust and Unrealistic

The idea of the need for extra security takes away the reason many people have moved to Las Palmas 1. The tranquility will be gone. Parents will no longer feel comfortable to let their children play outside by themselves nor adults may feel comfortable to use the walking paths or to walk their dogs on a regular basis. Our dog will not do her major business in the backyard. There are times, I have taken her outside at 2am. I am at present more concerned about coyotes and skunks, than people. Recently my grand daughter visited from Modesto. It is not uncommon to see bikes, helmets, sport gear and jackets left at the different parks. People may move them out of the way of others, but no one takes them for their own use. For several days, my 11 year old granddaughter saw a bike left at Circle Park. She became very concerned, wanting me to call authorities, thinking someone had kidnapped a child. I finally was able to convince her this was normal for Las Palmas 1. Its brought me comfort I've been able to provide my grandchildren a safe place to be children when they visit. I would be saddened to see this be taken away from my grandchildren and others living in Las Palmas 1. 84.8

No Essential Services for Patients.

Most of the patients will have mobility and other challenges. However in todays world of treatment they do need and deserve good access to personal and health support services. (Coffee shop, Hairdresser, Dentists, Therapist and other Health Professsionals. We have non of these and no commercial services at Las Palmas 1. The Las Palmas development was oriented that way from the beginning. It has been successful for over 30 years.It is eminently unreasonable to change the zoning now for the financial benefit of one developer (or small group). 84.9

(NOTE: The Property, Parcel Q, is presently for sale.

No Commercial Property Here. I recently found out that the commercial zoned 3.23 acres on Unit 1 were purchased by the Las Palmas 1 owners (the grassy area in front of Corey House) in order to prevent disruptive, unsightly Commercial Buildings being built). Not only did the purchase make Las Palmas 1 more pleasant and secure but also made the drive on River Road more enjoyable for travelers. If the Planned Development Project is approved, the 3.23 acres may become land which Las Palmas 1 Residents may no longer be able to use as an additional area to relax due to the heavy traffic which will be going down the street where located. It could become unsafe with vehicles accidentally driving onto property when Las Palmas 1 Residents are enjoying or involved in sometime of activity. 84.10

Rural Ambiance - Original Attractive Design - (To be Destroyed?)

There have been additional concerns pointed out to my Husband and I. When Las Palmas 1 was planned, a lot of thought went to the environment, open areas and roads. There was to be no Commercial Development and Las Palmas 1 was to be a private gated community. People purchased the homes for the open areas and safety factors. 84.11

Access Road Not Adequate - River Road Dangerous:

When Parcel Q was originally sold, it was Zoned Residential Use never Commercial, with access right through the main entrance of Las Palmas. The access road is steep and can't maintain vehicles driving back and forth for the Planned Development Project. We don't have the resources to be able to support such a project. Current and Past Las Palmas 1 Residents have worked hard to maintain the beauty and safety. They worked hard to have the River Road traffic signal light installed. It has reduced accidents but I have seen many close calls. Last year, I saw an accident which resulted in the vehicle ending up on the street entering Las Palmas 1, close to the Guard Shack. The accident could have gone very differently. With the amount of the proposed traffic, there is a high probability of more close calls and accidents. 84.12

Potable Water & WasteWater I understand we pay higher fees for water use and WasteWater services and water is in limited supply here. We should not be impacted by 84.13

this proposed development nor should any development gain for the monies Las Palmas 1 Residents have paid for their development. When we moved to Las Palmas, because of the safety and park use - I felt the HOA fees were not out of line. My Husband paid HOA fees at his prior home in King City but we didn't feel safe nor were the parks and surrounding areas being cared for in the same manner. We paid for Security System which we haven't felt the need to have here because of the Security. If the Planned Development Project goes through, we feel having a Security System will be necessary which will be another added expense. We also see the HOA fees being raised in order to provide safety for Residents of Las Palmas 1. I understand that there has been discussion of the Planned Development Project helping with expenses but that is only one issue and nothing has been offered whicht may not even meet what the Residents of Las Palmas 1 feel is needed. Due to the best interest of both sides, I hope the Planned Development Project is not approved. It would be a safety issue for both Residents of Las Palmas 1 and Resident of The Planned Development Project! Among privacy, criminal and safety issues — the lag time of Emergency Service Vehicles getting to Residents of Las Palmas 1 and Residents of the Planned Development Project, could result in life threatening conditions.

84.14

I request a reasoned response

Thank you

Sincerely yours,

Alan E. Anthony
Myra Anthony

Alan and Myra Anthony

Letter 84

COMMENTER: Alan and Myra Anthony

DATE: April 20, 2018

Response 84.1

The commenters express concern about feeling safe in the Subdivision if the project is approved.

Please refer to Topical Response A for a discussion of safety and security. The commenters concerns are noted and herewith shared with County decision makers for their consideration.

Response 84.2

The commenter states that the project would result in impacts related to light pollution, noise, traffic, and loss of privacy for nearby residents.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views and loss of privacy. As described therein, mitigation measures require landscape screening, earth toned building colors, undergrounding of utility and distribution lines, and unobtrusive lighting.

Regarding traffic impacts, refer to Topical Response D. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 84.3

The commenter states that the project will decrease home values, and that they should be compensated for that loss.

Please refer to Topical Response C. As described therein, property value is not an environmental impact and is therefore not directly analyzed in the Draft SEIR.

Response 84.4

The commenter states that the project would result in impacts related to traffic, security, privacy, and noise. The commenter states that a study of internal traffic has not been performed. The commenter lists sources of traffic that could occur as a result of the project, and states that the Subdivision entrances was not designed to accommodate high traffic volumes.

Regarding traffic impacts, refer to Topical Response D. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable. The traffic analysis included additional study of internal streets. Additionally, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts.

Response 84.5

The commenter states that the project would compromise security in the Subdivision, most likely resulting in crime and physical assaults.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision.

Response 84.6

The commenter states that Subdivision is kept clean, with strategically placed garbage cans, and that the project could result in litter and the need for new, expensive, unsightly garbage cans.

Section 11.11, *Solid Waste*, of the Draft SEIR describes the solid waste generation of the project. The proposed project would include recycling and waste bins throughout the project, which would be collected and disposed of by the Salinas Valley Solid Waste Authority. Trash bins would be sized as appropriate for the amount of waste anticipated to be generated by the project.

Response 84.7

The commenter states that the project would result in a need for added security in the Subdivision. The commenter asks what legal rights the residents have regarding non-residents wandering through the Subdivision. The commenter asks whether or not law enforcement personnel would support the Subdivision's security guards when necessary.

Please refer to Topical Response A. As stated therein, Section 11.9, *Public Services,* of the Draft SEIR, has been revised to include information about the Monterey County Sheriff's Office. The Sheriff's Office determined that the project would not require new or expanded facilities for the Sheriff's Office in order to continue providing the same level of police protection to the site and vicinity.

Response 84.8

The commenter states that the project would impact the area's tranquility, and that Subdivision residents would no longer feel comfortable walking their dogs or letting their children play outside.

As described in Topical Response C, neighborhood fit and quality of life are not environmental impacts and are not directly analyzed in the Draft SEIR.

Response 84.9

The commenter states that the residents of the senior assisted living facility would not have access to commercial services or health support services. The commenter states that it is unreasonable to change zoning for the financial benefit of a developer.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 84.10

The commenter states that if the project is approved, Subdivision residents may no longer be able to enjoy the grassy area in front of Corey House, because of traffic and the risk of vehicles accidentally driving off of the road.

Vehicles driving through the Subdivision to reach the project site would pass by the grassy area discussed in the comment by turning onto Woodbridge Court off of River Run Road. This segment of River Run Road is less than 300 feet long and ends in a stop sign. Landscaping with trees and sidewalk exists between the grassy area and the road. Therefore, use and safety of this area would not be compromised by an increase in traffic on River Run Road. For a broader discussion of traffic impacts, please refer to Topical Response D.

Response 84.11

The commenter states that the Subdivision is a private, gated community with no commercial development.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 84.12

The commenter states that the project site is zoned for residential use. The commenter states that the access road is steep and that the project would increase the probability of automobile accidents.

Please refer to Topical Response D for a discussion of the project site access. As noted therein, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts.

The project is a senior assisted living facility. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. For more detail, refer to Topical Response C.

Response 84.13

The commenter expresses concern about the project resulting in higher prices for water and security. The commenter states that emergency vehicle access to the project site is a safety concern.

The pricing of water and security service for residences is not an environmental impact and is therefore outside of the scope of the Draft SEIR.

For a discussion of security concerns, refer to Topical Response A. As noted therein, the project would not result in a significant impact on police protection within the Subdivision.

Response 84.14

The commenter states that emergency vehicle access to the project site is a safety concern.

Topical Response D explains that a new access route to the project site would not be necessary to avoid impacts on emergency vehicle access because the level of service on roads providing access to the project site would remain acceptable under the project.

From:	roygobets@aol.com
To:	Sidor, Joe (Joseph) x5262
Cc:	Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103
Subject:	DSEIR Considerations, Supplemental to 4/6/2018 Report
Date:	Friday, April 20, 2018 2:21:04 PM
Attachments:	Las Palmas I Neighborhood Survey.pptx

Letter 85

Hello Joe,

Please find below (3) additional concerns I wish to raise upon continued reading of the DSEIR.
These (3) supplemental items should be viewed in combination with my report submitted on 4/6.
I have not yet received your acknowledgement on that (4/6)report, did you receive it?
Please acknowledge both the (4/6) and this (4/20) submission.

Respectfully,
Roy Gobets

Storm Water Removal

From paragraph 11.6:

"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"

There is no such plan available in the DSEIR for review. This statement above says to me: "Our plan is to have a good plan.....Trust us - approve the plan and all will be well."

As it stands, this bold assertion in the DSEIR cannot critically be reviewed. Some serious issues are not raised.

1) Does this "plan" assume that there will be some linkage with the Las Palmas I stormwater drainage system? If so - no one here at Las Palmas is aware of any such discussions.
RVLP is NOT a member of the Las Palmas I HOA Association Membership. There is no implied consent to such a hook-up.

Diverting stormwater from an elevated plateau with 190,000 square feet of impermeable structures will overwhelm existing LPI systems designed for residential use.

If not counting on linkage with Las Palmas I systems - how would this potential torrent of precipitation be diverted? How will this storm water be mitigated?

Until the DSEIR includes a serious consideration of these critical issues it is clearly incomplete.

85.1

Waste Water
From Paragraph 10.1

" Landscape irrigation on the project site associated with the proposed project would use reclaimed water from the Las Palmas Ranch Wastewater Treatment Facility, operated by California American Water. Reclaimed water pipe connections to the treatment facility are already located on the project site."

2) Members of our LPI HOA were advised in a meeting with Cal American Water that the waste water treatment plant at the Kinship Center would be closed and waste streams would need routing to Marina along a "Force Main". Thus assumptions about California America Water serving RVLP are clearly questionable.

85.2

The RVLP DSEIR must provide further clarity how its needs will be serviced for both waste water treatment and grey water sourcing. And, just as in (1) above, any assumed dependencies on Las Palmas I infrastructure or grey water allocations must be clearly stated. Again, LPI was designed for residential use, not commercial entities. Clearly the DSEIR is lacking critical detail that precludes any intelligent discussion on this item.

Neighborhood Fit

Attached is a report summarizing a neighborhood survey to obtain direct feed back on the RVLP proposed project. The data shows overwhelming (93%) opposition to the project. This report was submitted earlier to the County and was NOT included in the DSEIR appendices. It is hereby resubmitted. The signature sheets collected are available upon request.

85.3

Letter 85

COMMENTER: Roy Gobets

DATE: April 20, 2018

Response 85.1

The commenter discusses Section 11.6 of the Draft SEIR, which states that the project would implement a stormwater control plan. The commenter states that the stormwater control plan is not included in the Draft SEIR, and thus cannot be reviewed. The commenter asks whether or not stormwater control would include connections to the Subdivision drainage system, and states that the Subdivision LPHOA has not agreed to allow such connections.

A Conceptual Stormwater Control Plan was prepared for the project as part of the preliminary design to address stormwater management for the project site and is provided in Appendix I-1. Please also refer to Topical Response E.

Response 85.2

The commenter questions the statement in Section 10.1 of the Draft SEIR that the project site would use reclaimed wastewater for irrigation. The commenter states that the wastewater treatment plant at the Kinship Center is scheduled to close, and thus future service from California American Water to the project site is in doubt. The commenter requests clarity about wastewater treatment and graywater sourcing.

The project would use recycled water from the Las Palmas treatment plant to irrigate common areas.

California American Water has stated that it will provide wastewater service to the project (see Appendix G of the Draft SEIR and Appendix I-2 of the Final SEIR). Therefore, continuous wastewater service can be reasonably anticipated, including during and after any changes to facilities.

Response 85.3

The commenter states that a neighborhood survey found that 93 percent of respondents were opposed to the project.

The comment is noted and is herewith shared with the County decision makers for their consideration.

Letter 86

David C. Dalby
21024 Country Park Road
SALINAS CA, 93908 USA

Email: dalbyd345@gmail.com
Phone 831-455-2231
Cell 831-595-6091

Mailing Address:
820 Park Row - PMB539
Salinas, CA 93901

April 20, 2018

Joseph Sidor, Associate Planner
The Monterey County RMAgency - Planning 2nd Floor
1441 Schilling Place
SALINAS , CA 93901

Reference: RVLP Draft SEIR for Proposed Development of Riverview at Las Palmas (PLN150372)

Mr Sidor,

As a 17 year resident of the Las Palmas Phase I sub-division in Salinas California and a Professional Engineer with extensive property development experience, please find and accept four copies of my report, in response to the DSEIR filed on March 12, 2018. A soft PDF copy will be sent by email for filing purposes 86.1

In summary I am rather disappointed with the DSEIR and its avoidance of several critical subjects and seemingly unsupported dismissal of subjects critical for residents rights, well-being in the Las Palmas property they have invested in. Our clear expectation is for recognition and continuity of proper planning processses and decisions.

Serious Concerns include:

- Discard of the Las Palmas Specific Plan - Process ? Precident ?
- Wastewater - present incapacity, major diversion planned.
- Water supply not consistent with the Developer's claims and needs.
- Land use inconsistent with County Standards.
- Inappropraite treatment of Memory patients .
- Both LUAC and the HOA Board withdrew specific support for this project

Although the report is my own Professional work, as a current Board Member of the Las Palmas I HOA we will collectively have significant challenges and responsibility for dealing with the aftermath of this Planning work.

I will be pleased to answer any questions that you may have and I wish to participate in future events such as relevant Planning Department and Planning Commission meetings.

Thank you,

Yours Sincerely

David C. Dalby P. Eng; NSPE

Encl. - c.c. Brandon Swanson - Planning Manager;
Jacqueline Onciano Chief of Planning;
Carl Holm, Planning Director and Roy Gobets - Las Palmas I

DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (DSEIR) RESPONSE

For

SUBMISSION IN THE PUBLIC COMMENT PERIOD AFTER THE PUBLICATION OF THE DSEIR BY THE COUNTY OF MONTEREY

Regarding

THE RIVER VIEW AT LAS PALMAS LLC (RVLP)
DEVELOPMENT APPLICATION PLANNING FILE
Number PLN 150372

PREPARED BY
17 YEAR RESIDENT OF THE LAS PALMAS I SUBDIVISION OF SALINAS CA 93908

DAVID C. DALBY P. ENG, NSPE

APRIL 20 , 2018

CONTENTS

PAGE

INTRODUCTION 3

SECTION 1 DSEIR Assessment 3

1.1 **DSEIR Summary - Errors and Omissions**

1.2 **Conclusions & Solution** 3

1.2.1 Summary of DSEIR items Missed 4

a) HOA Membership
b) LP Specific Plan Completion
c) CAL Water; CAL-AM
d) Management- Parcel Q
e) Road Access-Traffic
f) Access Overburden
g) Wastewater
h) Storm Water
i) Aesthetics Incompatibility & Ridgeline
j) Dangerous in Catastrophy
k) Mud Slides

1.2.2 Conclusions 8

1.2.3 The Solution 8

SECTION 2 PROJECT ENVIRONMENTAL EFFECTS & DSEIR Comments 9

2.1 **DSEIR Overall summary comments 9**

2.2 **Aesthetics 9**

DSEIR Comments

2.2.1 Sight Issues - Ridge-Line Development 10

2.2.2 Historic Building - Corey House - Road Overburden 13-14

2.2.3 Lighting 14

2.2.4 Noise and Sound Levels

2.2.4.1 Commercial Development Limited

2.2.4.2 Contractor Work Hours Limited 17

2.3 **Climate Change/Greenhouse Gas Emissions** 17

DSEIR Comments

2.3.1 Drought - Grass and Forest Fire Risks

2.3.2 Winter - Heavy Rains and Flood

2.3.3 Occupancy Risk Issues

2.4 **Hydrology/Water Quality - DSEIR Comments** 21

2.4.1 Potable Water-Ground Water

2.4.2 Wastewater

2.4.3 Flood Risk Established

2.4.4 Earthquake Results

2.5 **Land Use and Planning** 24
DSEIR Comments
2.5.1 Parcel Q - Original Plan
2.5.2 Utility Services - Limited and Assigned

2.6 **Transportation and Traffic - DSEIR comments** 26
2.6.1 Traffic - Access Issues 26
2.6.2 Emergency Access and Egress 26

Appendix - D.C. Dalby Bio and References 27 - 28

Introduction and Comments re: Draft SEIR

This report is prepared by David C. Dalby, a 17 year Las Palmas Home Owners Association (HOA) resident with over 20 years experience in HOA governance and over 2 years on the Board of the HOA of the Las Palmas I subdivision of Salinas, California. (See Bio in the Appendix). The proposal of the "River View at Las Palmas LLC" (RVLP) is to occupy part of the Phase I parcel also known as Parcel "Q" and develop a 24x 7 Seniors support and treatment facility plus 26 Casitas for residential accommodation for those who may not require treatment or support. Permission for this business enterprise requires violating the present land zoning i.e. the Las Palmas Special Plan of 1986 which overall affects over 1028 homes contained in the Las Palmas I & II Subdivisions with collective residential and community investments of many hundreds of millions of dollars providing a substantial taxing base for schools and Social Services.

SECTION 1 **DSEIR Assessment**

1.1 Summary

Issued March 12, 2018 by the Resource Management Agency - Planning Department, of Monterey County. This paper follows and lists the CEQA questions and its format guidelines as far as possible. All topics listed are considered to be capable of causing "Potentially Significant Impact" on the environment and particularly in the residential neighborhood that this commercial enterprise will affect. These conclusions are often in direct opposition to the stated remediation effects in the DSEIR. 86.2

Further, treatment of Memory patients has changed dramatically recently requiring access to family, community and modern health treatment methods not available at or near parcel Q. Descriptive sections of this report add some information given to the Planning Department at the time of the NOP and is carefully amended with comments, issues and facts regarding the DSEIR and its contents. Non-CEQA items, project related are also considered which will have critical effects on the residents of Las Palmas I and can also set important unsupportable precedents.

1.2 Conclusions

The Draft Supplemental Environmental Impact Report (DSEIR) as published March 12, 2018 is seen to contain several errors, omissions and judgements which when corrected substantially lead to negative and even dangerous side effects of the development on the present 329 owners of property in the Las Palmas I sub-division. This has been in place as a "residential only" subdivision since the 1980's. 86.3

The two votes taken of the Las Palmas Home owners in 2016/17 show overwhelming opposition to the development and is enumerated as an effective random sample follows: - .

Vote 1 - 2016, 50% of 329 homes randomly polled - - 93% opposed the RVLP project.

Vote 2 - 2017, by the Home Owner Association of 212 owners responded out of 329 - 72% opposed RVLP,

1.2.1 **Summary of DSEIR Items Missed or Poorly Represented:**

A) HOA: The DSEIR claim that the developer is a member of the Las Palmas I HOA. is incorrect i.e. not true. The developer only pays the sum of $40 per month as a part payment of the maintenance cost of the Las Palmas I roads which is proposed to provide road access for the new businesses. The developer does not pay regular dues to the HOA as do the 329 home owners and therefore is not a member with voting or management rights. Road access is the only right. Further as claimed the patients, staff, relatives and visitors do not inherit unhibited access to the trails, sidewalks of Las Palmas I. 86.4

B) Las Palmas I is **not** fully developed (per LP Specific Plan) as claimed in DSEIR sec. 2.2 page 2.2. At last count three homes could be built on Parcel Q in order to complete the development as originally planned. **As late as 2010** the published plan by the then developer (Mr Fletcher) was for between 5 or 8 such "High End Homes" on Parcel Q . Even now, such a residential development would be profitable for the present experienced developer and be compatible with the present Las Palmas Phase I development and owners. 86.5

C) **Questionable CAL-WATER and CAL-AM Supply**
These key issues are either poorly or incorrectly **addressed in the DSEIR**.
a) **CAL-WATER** Will - Serve letters to the developer only have a subjective and limited longevity. During the recent 5 year drought of this area, the "Will Serve" guarantee to Las Palmas Iwas reduced to an "11 "month supply. No service was "guaranteed" after that. So, how will that affect the parcel Q project for both long term operations and fire protection? 86.6

b) **Waste Water Unavailable:-** In 2017 CAL-AM informed (in a meeting) the HOA Boards of Las Palmas I and II that they (CAL-AM) were under direction from the County of Monterey to close down their Waste-water treatment plants on River Road for both Las Palmas I and II and transmit all effluent via the planned **Force Main** to the Regional treatment center in Marina. Estimate for completion - -2021.
Meanwhile the present LP CAL-AM Waste-water plant has only 200,000 gallons per day of capacity and is operating at over capacity in the present winter climate conditions.
Parcel Q - cannot be added to that plant which had a 123 violation record for two years to 2016. How can this development be permitted ?
Parcel Q has no natural water supply - **i.e. no irrigation and no fire protection for Parcel"Q".** 86.7

D) **Property Managment - Neglectful - High Fire Risk** - and poor dangerous egress for patients.Whilst this may not be considered a truly accepted DSEIR ISSUE it certainly should be for a"Health Facility and is an increasing danger for both the existing residents and the proposed patients of Parcel Q. Photos in this document show the extent of the grasslands covering nearly half of the parcel Q acreage which will have no irrigation water, no fire control/prevention installation or plan. 86.8

In fact the present owner has shown no consideration for the present dire state of affairs for the existing LP1 home owners.

1) Fire Risk Reduction: The present LP I home owners have had to reduce the fire danger each spring by paying for the grassy slopes of Parcel Q to be cut, but have had no cooperation from the owner who has left many dead and fallen trees as dangerous combustible material right through the 2017 fire season. they are still there to be seen in 2018

2) Mud Slide Prevention: The original developer of the Las Palmas I and II installed some concrete dams in strategic places on slopes behind Country Park Road, to prevent the slopes of parcels Q and L from causing mud slides and possibly floods.
This new developer has had no such preventative plans nor considerations.
see Page 6 below - **Why is this not a planning requirement?**
In fact in February 2017 a serious mud slide caused flooding right up to the houses of two owners who live on Country Park Road. Several other slopes remain very much at risk as climate change progresses. The danger is evidenced in the design paper submitted to the new developer by Landset Engineering. It took a lawyers letter from the Board of Las Palmas I to get the developer to correct the mud slide effects from and on parcel Q. 86.9

E) The Road Access to Parcel Q - is a problem. The angle up to the elevated property is in parts too steep for regular fire equipment to navigate. Further for the patients especially those in Casitas they have a 1/2 mile ring road to navigate and compete for egress, first with their own patients of the two large buildings and then the occupants of Chateau Coralini plus the 329 home owners of Las Palmas I. The numbers can be high - 142 patients; up to 92 staff; patient relatives and guests - Could be several hundred people with no direct egress path of their own. Clearly their safety is not considered important and local Traffic Impact of the project has not been measured. 86.10

F) **Access Over-Burden** The traffic to/from parcel Q is easily shown to overburden the permitted access road from River Road both during construction and also afterwards during commercial operations. **See Pages 12 and 13 below**

G) **Waste-Water** - With CAL-AM under Direction from Monterey County to close its Las Palmas sewage treatment facilty and have the effluent sent by the planned pressure main to the Marina Regional Facility. Therefore the DSEIR claim that the Parcel Q development will use the present "Grey Water supply" for irrigation and fire protection is clearly false. No physical plans for dealing with the Waste-Water from parcel Q are identified in the DSEIR. 86.11

H) **Storm Water Disposal** required for RVLP is at capacity. No plans for this disposal are shown in the DSEIR. With some 15 acres of property containing 190,000 sq ft of buildings; a 1/2 mile ring road; an access road and at least three visitor and staff parking areas then this requirement should be addressed in the DSEIR. It is not! 86.12

The Las Palmas I Storm Water system was designed over 30 years ago before climate change. The stream coming through Parcels "S & R" from the hills now runs 24x7 and heavily in winter. It is pumped into the Storm water system at the top of "Old Ranch Court. The system is not designed to add the large commercial development of RVLP.

I) **Incompatible Development:** It is quite clear that this profitable commercial development is far different from the County Board approved Las Palmas Specific Plan of the 1980's. This is particularly important as: 86.13
i) the existing plan for Las Palmas I, is still incomplete and
ii) the proposed development is of a completely different and commercial nature, i.e. a large profitable 24x7 commercial venture located far away from any support or community facilities normally sought by such care homes and
iii) it also also contains providing 26 ordinary family Casitas the residents of which may require neither support nor assistance i.e. **for normal residential purposes.**
So, why is the existing Las Palmas Specific Plan not being completed as originally planned and advertised ?

iv) This is a Ridge-Line development prohibited in tourism development areas and corridors. These designations include River Road and Highway # 68 and also affect Sprekels Blvd. See enhanced Ridge-Line photos and details P 8 - 10 below.

J) Dangerous Access to River Road, 86.14
This already dangerous access (see statistics showing multiple River Road drivers running red lights and subsequent accidents). It would also be overrun with the day to day increase in traffic to and from the new development. Therefore it will be impossible to safely cope with an evacuation when required due to fire, earthquake or flood. The patients, staff, visiting relatives and friends (up to say 400 people) would be in peril ying to leave down the narrow trail to the highway and the present HOA residents would be in peril competing with all other residents to exit by the very limited exit lanes onto River Road.

k) Mud Slide Prevention:The original Las Palmas Developer was required to plan for and install carefully thought out slide prevention concrete structures higher up Country Park Road. There appears to be No Planning Requirement for mud slide prevention or remediation on the steep Eastern/South slopes of lower Parcel Q --**WHY**? 86.15

Summary of Conclusions: Inescapably, this project is:

i) The Wrong project - demonstrably incompatible with the existing zoning, and ultilty regulations whilst raising owners Personal (Fire) and Property Risks during natural catastrophies while reducing personal and property security. 86.16

ii) The Wrong location - this location shows antiquated thinking, leading to poor treatment. With today's knowledge similar such developments are located not far from areas capable of providing essential community and personal interaction and support services etc. (e.g. Windsor Homes). Such suitable locations with proper zoning are available in the Salinas area and the Region.

iii) The Wrong Time - for the proposed Parcel "Q" property climate change has occured and raised the risks of Fire, Flood and other catastrophies to an alarming level - the steep, slide prone slopes of the elevated parcel offer unacceptable risks to any infirm residents and the established Las Palmas residents.

iv) Against the Present Home Owners Voted Wishes.

The Las Palmas HOA Owners took votes in 2016 and 2017, showing the majority of owners oppose the Project. (see Page 3)

The Solution Not Considered in DSEIR Section 17.0 - Alternatives:

a) Permit the Construction of the handful of the remaining "homes" on Parcel "Q" to complete the Las Palmas Development as per the original Las Palmas Specific Plan of the 1980's under which the present over 1028 home owners of LAS PALMAS I & II have bought and maintained their homes. The low property purchase price out of Bankruptcy would clearly make this a profitable venture to the experienced contractor involved. 86.17

b) The Developer's Plans need not to be wasted.

There are re-developing areas in Salinas and the Region which would be welcoming and very supportive of such a business. Patients would fully benefit from the ability to supply the latest treaments, proper support all in more holistic circumstances.

SECTION 2 ENVIRONMENTAL EFFECTS ISSUES of the PROJECT & DSEIR ITEMS

This section reviews the Project Proposal and identifies items of concern to be considered in the Environmental Impact Report for this project and expands on the effects of the various parts of the proposed business development and operations as presently known showing the DSEIR to be an incomplete document. 86.18

2.1 DSEIR SUMMARY: Essentially this paper seriously questions the accurancy of the DSEIR document as issued.
(Particularly see LUAC report; Ridgeline Development assessment and the Road Overburden analysis and lighting reports in 2.2 2 and 2.2.3 below.).

Owners Meetings
The property owners of Phase I of the Las Palmas Development originally worked hard to collaborate with the developer and have met several times in open sessions with the developer. One of the first and consistent requests by HOA residents was for the developer to access via a separate road to the Parcel "Q" lot thus reducing the operating conflicts otherwise surfacing. These conflicts include a 24x7 operations with 92 staff serving some 142 patients some even with serious health requirements. The developer has been unwilling or unable to arrange for a road access separate to Las Palmas Phase I and lately has not wished to meet with the residents.

Toro Park Land Use Advisory Committee (LUAC)
A group of owners and Board members of Las Palmas Phase I, attended a fall meeting of LUAC to outline concerns regarding the project . The LUAC Board unanimously passed a motion recommending that the project not be approved as outlined and the development of Parcel "Q" should revert to the original Las Palmas development plan of the 1980's i.e.the proposal outlined by the original Developer, Mr Fletcher at a public meeting as late as 2009 was for up to 5 high end homes to be built on this Parcel Q view property.

2.2 Aesthetics - the New Developer's RVLP Plan

CEQA Guidelines The following are considered to have a **"Potentially Significant Impact"** on the environment. 86.19

a) Have a substantial adverse effect on a scenic vista?

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

d) Create a new source of substantial light or glare which would adversely affect day or night time views in the area.

The ANSWER IS A strong YES to all of the above, also add Noise, Enhanced residents Personal and Property Security and Fire Risks (and include Odors too).

The Developer plans to construct several buildings on the parcel, two of which are major three story buildings with elevators, totalling some 82,000 sq ft giving a roofline of 30 - 40 feet above ground level, which will give high visibility to many surrounding homes, businesses, travellers and passers-by on Highway 68; River Road and Spreckels Blvd. The DSEIR table 2-1 conclusions of Impacts an Mitigations concluding all are "less than significant" is rejected almost in its entirety. The development roof lines cannot be merged into bushes and trees and the lighting requirements will be noticeable for miles around. Residents of Las Palmas particularly in the Parkside area will be affected with the higher lighting requirements for patients with disabilities.

2.2.1 SIGHT ISSUES - RIDGE-LINE DEVELOPMENT

Many existing homes can clearly see parts of the proposed new development, especially in the "Parkside" area of our present development. However, some homes in the River Run section also have that capability. The photographs below enhanced with the building lines showing and trees planned to be removed eliminated.

Outside of the Las Palmas I subdivision, travellers (on foot, bicycle and car) both on River Road and also from larger sections of Highway 68 and Speckels Blvd will have prolonged and commanding views of the development both in the daylight and from the

86.20

lights in the evening. The bridge over the Salinas River and its approaches for several hundred yards will give clear views of the development. This especially affects cyclists and walkers who are being encouraged to use the new elevated 'Foot/Cycle' path over the Salinas River. See photos below.

The lower photograph above shows the present ridge location of the proposed RVLP development including the tall Eucalyptus trees which are scheduled by the developer to be removed.

The upper photograph properly integrated with the developer's Flagging (see other photos in this document) indicates the view of RVLP as it really is, **Ridgeline development officially forbidden** in this region and also shows the real impossibility of in any way hiding the

development by integrating into the existing rural terrain with building colors and bushes etc.

The Monterey County Board of Supervisors have declared River Road to be designated as a "Wine Corridor" and highway 68 also has a "Scenic Designation..

Above - RVLP from River Road -with scheduled tree to be removed eliminated and rooflines included.

Photo Below: The proposed project site is the raised level area at the end of the street, the parking lot and buildings are constructed above the steep grassy slopes on the ridgeline.

2.2.2 Corey House , a listed Historic Building (Now Chateau Coralini - a Boutique Hotel) (CEQA Question b).

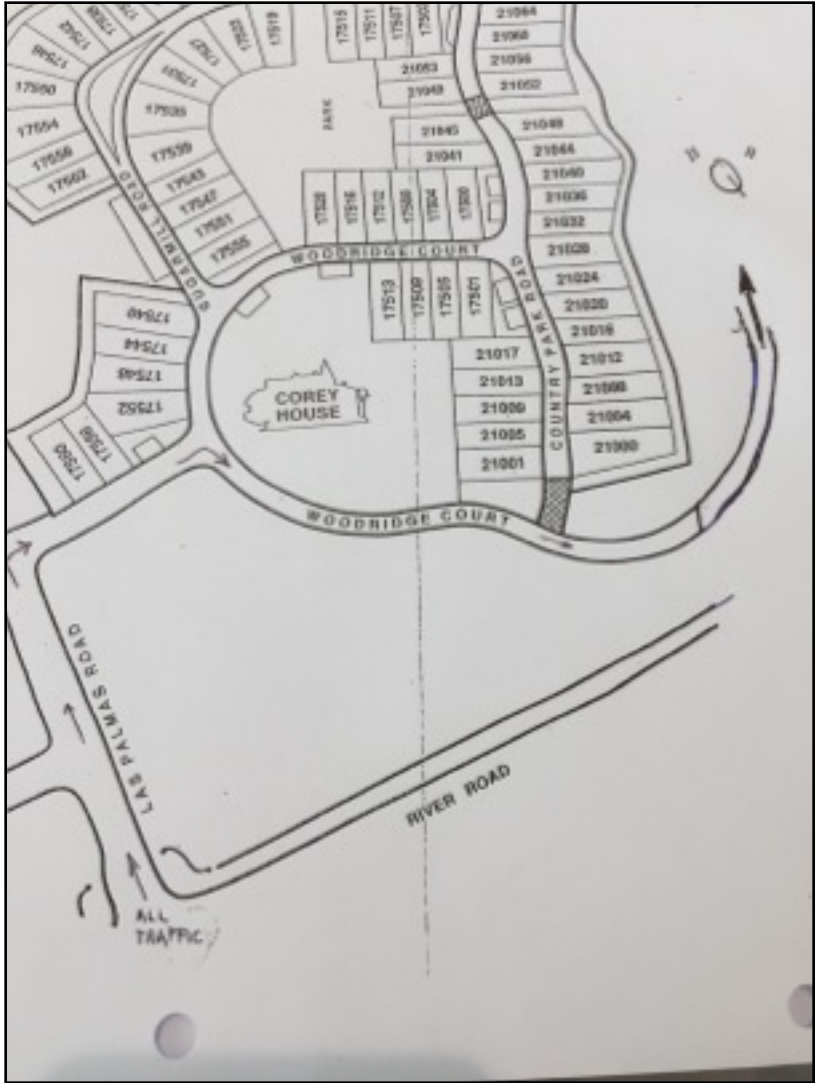
This 2 acre parcel is zoned LC-HR - Limited Commercial-Historic Resource. 86.21

Note: also the ridgeline at the building flags - Also visible from River Road.

DSEIR "Omission:"

HISTORIC BUILDING - Corey House a 19th Century farm house and the last remaining part of Hiram Corey's agricultural 645 acre Estate, is listed on the National Register, and is adjacent to and completely overlooked by the proposed development. It will be impacted by the 24x7 operation and 24x7 traffic as all traffic must pass round the property on journeys both to and from the Parcel Q development. All traffic to and from the proposed new development must use the road shown above then turn right at the stop sign and pass the Hotel front door and round Corey house in order to access the trail to the property above on the raised 15 acre development bench.

It is now now a Boutique Hotel and is overlooked by the proposed development just above and behind it. Also, all traffic to and from the proposed new development must use the road around it and pass the Hotel front door in order to access the trail to the higher 15 acre development bench area. (See below)



ALL TRAFFIC TO AND FROM THE PARCEL Q DEVELOPMENT passes around and in the front of Historic COREY HOUSE disruptively 24x7.

DSEIR ISSUE - ignored - Access Road Overburden:

Overburdening the access road is easy to show. As a farm access road built originally in the 1880's it is not designed to present CAL TRANS standards and will be heavily impacted by the development with the several thousands of truck loads of "fill" to be moved into and/or out of the development. Also including the intake of thousands of yards of replacement material some of which is required for the planned 1/2 mile circular road on the high part of the property. After construction the traffic side of Corey House will again be heavily and intrusively impacted i.e by a 24x7 commercial Health support operation - staff, visitors (every day), patients all moving plus traffic of the residents of the Casitas. Also add emergency vehicles with sirens and lights travelling during medical emergencies. Plus add normal service, supply and treatment agency vehicles.

Plus, **ADD** the access and egress use of the access roads by returning home owners. Most owners use the traffic light controlled access with some 140 home owners of the Parkside Section directly using most of the parcel "Q" permitted access road (recall also that every day is visitor day after 4pm, at these Senior Care and Treatment facilities). Our resident volunteers at local Carehomes over several years can attest to the resulting high traffic volume.

86.22

All of this is not considered in the DSEIR documents.
<u>Conclusion</u>: The Original Access for farming built in the 1880's is not to CAL-Trans specifications will be "<u>Overburdened Indeed</u>".

2.2.3 LIGHTING -
<u>DSEIR Comments:</u>
Lighting from this raised area cannot be mitigated by planning as claimed by the DSEIR. It has been demonstrated on more that one occasion by some users of this property in night time visits using just flashlights (now with bright LEDs) easily shine through curtains of the properties below and disturb sleeping residents. Add the planned 1/2 mile ring road on Parcel Q and traffic on a 24x7 basis all of which must use down facing headlights plus properly designed downward facing area, road and parking lot lighting has to be very visible by not only Las Palmas I residents but also traffic on River Road; Highway 68, Reservation Road and Spreckels Blvd.
This project will bring intrusive lighting to many HOA residents some of whom work variable hours..
Even today the necessary street lamps on Las Palmas I have brought complaints to the Board from some residents of the lighting interfering with sleep. The higher Street and building lights of the proposed development will directly shine into either the front or back windows of homes directly sighted which will include many homes in the "Parkside" area. **We residents already have examples of this effect!!**

86.23

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2.2.4 NOISE and SOUND LEVELS

CEQA Designations: Will there be ?

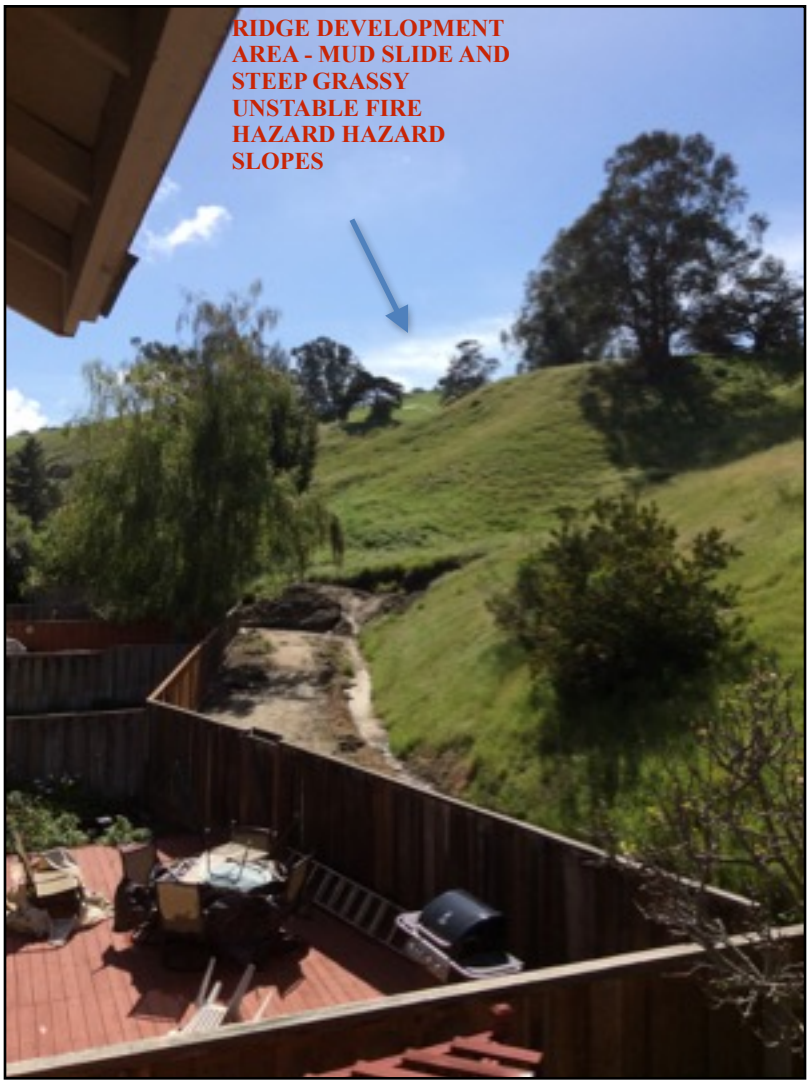
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

86.24

The answer is YES to both, but not properly analysed in the DSEIR.
i) On a continuing basis, this is a 24x7 health support facility with some 142 patients and 92 staff has very complex requirements for various fire, gas and other alarms integrated with all buildings. These systems require regular testing and of course use. Located directly overlooking LP I residential areas the noise will be significant.
Also regular traffic of staff, suppliers, professional workers, maintenance crews, family visitors and the residents themselves must all create a new source of noise.
ii) During the construction phase of up to two years the high noise levelswill be of traffic in and out and heavy construction equipment working continually. Further the literally thousands of trucks as they access Parcel Q will be required to gear down to cope with the steep access road Because of the elevated construction site the particulate in the air will offensively drift down around the surrounding residences and Corey House. Really dirty air can be expected for up to two years according to the developer.

This will be directly contrary to the efforts of the owners of this existing development have over the years consistently taken steps to provide a quiet and safe living environment for all residents. (see below).

2.2.4.1 Commercial Development Avoided



On this Phase I property commercial development has been specifically avoided by the residential owners. The 5 acre commercially zoned area of the Phase I lands, (now called Corey Park) located to the north and adjacent to the main Las Palmas entrance was bought out by the Phase I owners with no commercial development planned. However the owners do insist on retaining the resources and the right to develop the parcels commercially at a later date when conditions warrant it.

86.25

Therefore, at this time this proposed project then goes directly against the express wishes of the present propery owners of Las Palmas Phase I some of whom have been resident there for a very long time, some from the beginning.

2.2.4.2 Contractor Work Hours Limited

Further the Board of the HOA manages regulations which set and limit hours of work for contractors working on homes or service contractors serving the whole of Phase I. Once more this development has no obligation to support the wishes of the present residents. 86.26

2.3 Climate Change and Greenhouse Gas Emissions

Whilst climate change was not considered as part of the planning of the original Las Palmas Development, the effects of climate change today are very clear, noticeable and with extreme levels of heat in summer and storms in winter at Las Palmas I. It is introducing a wide variety of risks and even damage which require addressing. 86.27

2.3.1 Drought and Grass/Forest Fire Risk - Extremely High - see photo above.
Should be a seriously considered DSEIR ISSUE
(see photo above Parcel "Q" adjacent to our Residences) 86.28

This area and region is just coming through a 5 year summer drought, but with sufficient rain in the winters to grow long stretches of significant levels of long grasses forming fuel for grass/forest fires. The Soberanes fire of 2015 was intentionally set and covered some 33 sq. miles and destroyed some 50 structures. It started in similar terrain to Las

Palmas and just a few miles south of this location. The photo above shows the slopes below the proposed development and the fence of the adjacent residences of Las Palmas I. In summer there are many continuous miles of this fire hazard of grass, brush and trees. Any natural or man-made incident would involve loss of life particularly in the proposed development.

2.3.2 Winter Heavy Rains and Flood

Climate change not only means events such as the drought outlined above but also more extreme precipitation and wind in the winter months. Parcel "Q" is not designed nor ready for those events. So, this winter stormy weather caused two mud slides from the Parcel "Q" property which spilled onto the Phase I property covering a storm drain and ditch line which resulted in a flood into the back yards and close to the homes of two residential properties. The flood also closed the Emergency Access Road to the Country Park Road residences of Phase I. The Monterey County Fire Department teams mobilized and responded to assist with the clearing of storm drain and flood water.

See below the overall mud slide some 30ft long and 10ft wide and many ft deep.

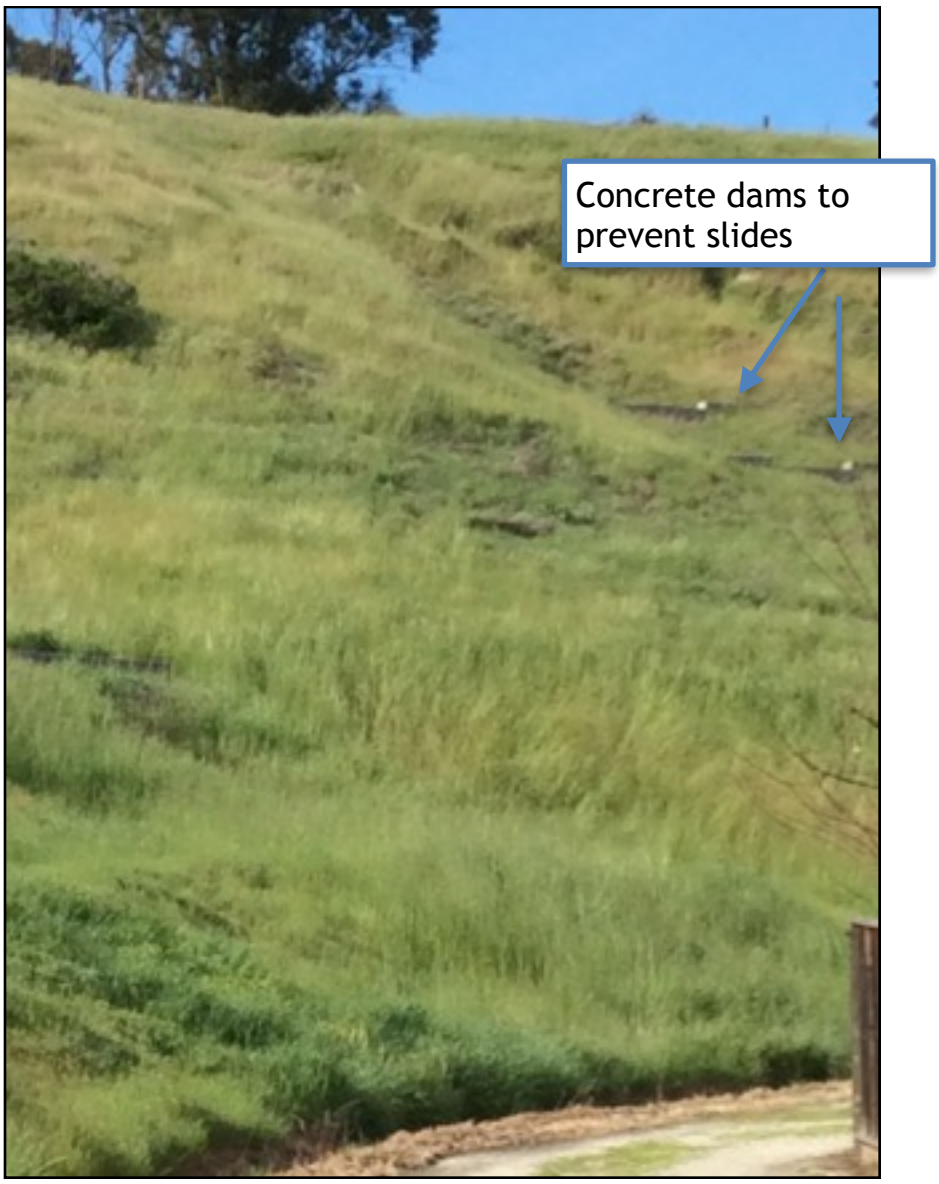
Another slide occured from the top of the rear part of the property onto River Road, the 4 lane access highway.

86.29

Photo below : Shows the mud slide and the back yard fences in March 2017 (at 21044

Country Park Road -approx) plus the debris on the Fire Access road (was impassable). The mud towered above the storm drain, the blocking of which caused the flood through the back yards right up to the adjacent homes.

These slopes have angles up to 60 degrees with no remediation to ensure stability. Remediation was required and has been constructed in other parts of the development.(see photo below) The



left part of the photo shows the start of the high Couloir which swings round. There is a lot more soft "mud" to feed slides in future storms. **The Monterey Fire Department mobilized** to help eliminate the flood.

DSEIR and Planning Omission.

There is no mention of a remediation work requirement for the lower Park Road slopes which have high slope angles and have already shown the capability in this present climate to cause mud slides and floods. **The original developer was required to protect the upper slopes**. Why is nothing required for the now at risk lower slopes? SEE ABOVE.

Showing the trail behind the House line of Country Park Road. Also showing the mud slide at the trail corner and the proposed building flagging above. Also showing above is the damage to the

86.30

ditch line part of the phase I storm drain system. The Storm Drain access at the corner became blocked causing flood waters into back yards and right to the backdoor of a home. All of which were only fixed just before year-end 2017 after a "lawyers letter" was sent to the Developer.

2.3.3 **Land Use and Occupancy Issues (+Important DSEIR Issues}**

<u>Planning for this development is argued to be deficient</u> particularly as the existing plan for Las Palmas I is not complete as per the Las Palmas Special Plan of the 1980's and the proposed re-development is of strong Commercial nature **incompatible with a "Quiet, Secure Residential Development** whose owners chose to avoid any commercial addittions to the Las Palmas Phase I. 86.31

Further this proposal is for a large profitable 24x7 commercial Health Support venture located far away from any service support or community facilities increasingly sought by such care homes. Further, the 26 ordinary family are just residences and avoid the normal requirement for "inclusionary low cost homes". The Casitas residents do not have to take any support nor assistance - i.e. they are normal residential home owners of which may require neither support nor assistance.

Higher up the Fire access Road behind Country Park Road

<u>Other Land Use Issues:</u>

a) **<u>Small Investment - Huge Tax Consquences</u>**
The 329 homeowners of LasPalmas I have an investment level in the quite secure residential sub-division in excess of $200,000,000.00 with a commensurate property tax level. The proposed developer not only puts this level of community support to a risk of a 10 - 15% assessment reduction. The business will invest only some $5 million using property which in bankruptcy was valued at only $140,000.00. A strong case for the "American Greed" TV program. 86.32

b) **<u>Dangerous Access Intersection</u>**
CHP statistics indicate that this intersection has produced a large number (24) of very serious accidents over the last few years. This development and its increased level of in/out traffic (especially in the 3.00pm to 6.00pm time periods) require traffic to queue up on River Road waiting access. 86.33

c) **<u>Natural Habitat and Rare Species</u>**
The proposed relatively high per capita occupancy of the view property certainly displaces the relatively abundant wildlife and eliminates or disturbs the flora. Naturalists have observed at least one rare species on the property and those residents who use the Las Palmas pathways are familiar with the abundant levels of wild animals, birds and flora species which will be destroyed by this development and are not adequately discussed nor analysed in the DSEIR. (see Sec 7 - P7.4 to P7.6P) 86.34

d) **Poor Social Planning** This development is unfortunately a well "out of date" level of thinking regarding supporting and treating older populations especially in the support and treatment of memory stressed patients. Locking them away with limited or no Social Interaction is antiquated thinking.
Other similar facilities in the area are examples of better thoughtful planning of locations. e.g. Windsor Homes in and around Salinas. 86.35

e) **In a catastrophic event (e.g. Fire, Flood, Earthquake)** evacuation of all patients and staff would be catastrophic on such a narrow winding access road - - Pretending as the Developer does, that all patients will be put on a bus and be gone going behind the over three hundred determined home owners plus the occupants of Chateau Coralini is irresponsible and potentially deadly for the patients.
However, it also raises the personal risk to the safety of the existing home owners - which to us is another quite unacceptable extreme example for the "American Greed" angle.(see Sec 2.6.2). 86.36

f) **This is a Ridge-Line Development** Plain and simple: from River Road; Highway 68 both of which have "Scenic Route" designations and also ridgeline when viewed from Spreckels Boulevard. Planners here have to get serious about supporting these designations as they really affect the quality of the tourist Industry's developments which are not only much higher employers but also provide more investment, jobs and taxes.
It is our (my) experience that most Municipal "Development Commissions" do take that designation seriously in supporting the vibrant Tourist Industry.
There are more suitable locations for this business in the region. 86.37

2.4 Hydrology/Water Quality

86.38

CEQA Guidlines

IX. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any water quality standards or waste discharge requirements?

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre- existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

f) Otherwise substantially degrade water quality?

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

j) Inundation by seiche, tsunami, or mudflow?

Several of these issues have **Potentially Significant Impact** with or without Mitigation Incorporated. See commentary below.

Commentary: FOR DSEIR

2.4.1 Potable Water - Ground Water use (CEQA a) and b): 2 items

This part of California is still officially in "Drought Condition". The water resources in Salinas Valley Zone 2C are officially in overdraft condition. This large commercial development really cannot be accommodated at present. The MCWRA "Basin Intrusion" reports are due to be updated now with the 2017 data which will definitely confirm this.

a) Whilst 'letters to serve' have been issued they are limited in time and the drought is not certain to be declared over to ensure new supplies will be available.

b) With Corey House now licensed as a full service hotel and the Owners of the commercial lots in the Las Palmas Special Plan insisting on retaining their right to develop those commercial lots at a later date, then re-assignment of existing approved water uses does not exist.

2.4.2 Wastewater Use. - -Published Plan Impossible to implement

New County CAL-AM GUIDELINES not Considered in the DSEIR

The preliminary "Project Plan/Description" (Lombardo & Assoc. - May 2016) asserts the requirement to use Las Palmas Phase I wastewater system for irrigation purposes. However, the drought has shown that these waters in today's circumstances may not be available. This deficiency has serious consequences as the elevated project will not generate its own supply, therefore ignoring raised fire risks.
Without occupation this elevated parcel "Q" already exhibits a fire risk often year round and with the potential of high occupancy that risk is raised much higher. (see Page 11).

Further: - At a meeting with the LasPalmas HOA in May of 2017, CAL-AM announced that they were under direction from Monterey County to plan to turn down their waste-water treatment facilities on River Road used by both Las Palmas I & II and use the planned "Force Main" to transfer the effluent to the Marina Regional treatment facility just as soon as it becomes available.

2.4.3 Flood Risk Established (CEQA - j)

This risk is already established even before stormwater from potential access roads, parking lots and buildings occurs. (see pages 11 and 12). Winter 2016-2017 was a wet one and runoff from Parcel "Q" caused two mudslides which pushed mud and water onto Las Palmas Phase I properties; compromised the storm drain system and caused floods which closed the Emergency Access road behind County Park Road (for 3 weeks) and flooded the backyards of two homes with flood water reaching the rear door of one home.

86.39

Winter of 2017 and 2018 is a closely similar example of extreme weather patterns alternately drought with heavy precipitation (so far this spring over 2 1/2 inches of rain in just a few days with no end in sight (3/21/2018 is very similar to 2017 conditions which resulted in the mud slide from Parcel Q onto Las Palmas I properties which the developer was reluctant to rectify.

2.4.4 Earthquake Zone - Risk Established

Within a week of the Emergency Access road being re-opened this spring, the earthquake at Aromas, clearly felt in this area, caused part of the mud wall left by the clearing contractor to fall back from Parcel Q onto the storm drain of Las Palmas.
Whilst this did not close the drain again, the risk of damage is now constant without remediation (which was only supplied by the owner of Parcel Q after our Lawyer's letter - just before the late 2017 wet season commenced).

86.40

iu**2.5 Land Use and Planning**

CEQA Guidelines The following are considered to have a "Potentially Significant Impact" on the enviroment.

86.41

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

d) Conflict with Community Plan Objectives.

Conflicts

This project conflicts with the original "Specific Plan", Las Palmas Phase I and Phase II of the 1980's for the development of a total of 1,031 residences, which so far has been carefully followed. There are also conflicts with the Monterey County General plan.

a) The original development containing Las Palmas I is almost filled out in accordance with the Las Palmas Special Plan of the1980's. The original developer's plan for parcel "Q" was for the construction of 5 high end residential homes. (see Fall 2009 Public Meeting Fletcher/HOA residents). This has not been completed. The Project Description/Plan called RVLP (see Lombardo and Associates - May 2016) is a Medical Support and Treatment Facility - a relatively large business and quite incompatible with the existing gated, secure residential development of some 329 homes most established for over twenty years.

b) **Individual Residences** However, in the detail of the new Project Description called RVLP on Page 2 includes an outline of the 13 Casitas (26 individual living units) as "allowing for independent living including fixing their own meals and keeping their vehicles". Assistance is not an obligation. Therefore these are actually independent living units which alone would take the overall growth development of Las Palmas well over its planned limit. A violation of Monterey County General Plan and the Las Palmas Specific Plan and against LUAC advice.

b) There is a County Land Use requirement that "land uses be compatible with adjacent land uses". Overall, this RVLP proposal is a large commercial business in the support and treatment of patients needing that support. This is not compatible with Las Palmas Phase I whose owners have confirmed the objective of residential quietness and security by buying out the "Commercially zoned" lots adjacent to the main Las Palmas entrance. Further, they have added extensive security to the residential development essential in today's world around Salinas. This security would be seriously compromised by the RVLP development. This incompatibility was confirmed by the unanimous voting record of the LUAC meeting (Toro Land Use Advisory Commission) of September 2016.

c) Ridge Line Development: This development on the elevated hill top parcel "Q" is essentially 'ridgeline development' which is not permited in the County, especially in the "Toro Scenic Highway Corridors". The view from the new walking/cycle trail across the Salinas River on Highway 68, also from parts of River Road, plus from street level in Las Palmas I, will all confirm that. Further the roads mentioned above are designated as visually sensitive for Tourism development purposes. Scenic values should be preserved. The three story buildings with elevators and say, a 40 ft roof line cannot be hidden on that elevated land. Few large trees are left after these winter storms and new ones will take a long time to grow. This development will be a "blot on the landscape" and will not enhance the scenic value of the area. 86.42

d) Care-Home Location: **Both the County Board of Supervisors and the City of Salinas are on record of condemning developers whose developments leave elderly citizens well outside of community facilities which could otherwise allow access to services and community activites from which they may benefit**. In the Salinas area specific critisism has been offered to the Tynan Development on Alisal. Further an analysis of other "Care Homes" in the Salinas area offering similar support and treatment facilities to RVLP are located in or adjacent to the community where medical and living support services are close-by and where beneficial services and supplies are available encouraging patients to participate in the community to some extent where possible. 86.43

2.5.1 Parcel Q - Original Plan

The published intent for the development of this parcel was for some 5 high end homes on what is in fact view property. Such a development of high end homes (or the number remaining to complete the original plan) would be compatible with the existing huge investment in homes and operations made by the present owners of Las Palmas Phase I. 86.44

2.5.2 Utilities Services Limited & Assigned

i) Corey House (now Chateau Coralini) is licensed and set up as a boutique, Full Service Hotel. 86.45

ii) Other assigned utilities services are reserved for a future commercial development on the commercially zoned lots owned by the Las Palmas Phase I owners if and when they desire that change.
Therefore services for the proposed Parcel "Q" development are in reality not available for assignment to Parcel Q.

2.6 Transportation and Traffic

CEQA Guidelines **The following are considered to have a "Potentially Significant Impact" on the enviroment.**

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

e) Result in inadequate emergency access?

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

2.6.1 Traffic Estimates - Access Issues

Those estimates from the developer are challenged. the access from River Road is also inadequate to cope with the local and/out traffic of both the parcel Q traffic and the 329 home owners. See road map on page 13. 86.46

24x7 staff cannot be seriously expected to wait in remote areas for a bus in today's society. **They will use their vehicles**. Further, our residents volunteering experience witl similar local homes shows that every day can be visitor's day. These homes increasingly rely on family members to help patients to keep socially connected with family and friends who assist with their treatment. This is especially true in the case of Memory patients.
The developer expects that visitor time i.e 4 pm to 8 or 10 pm will be a peak traffic time. This coincides with the return home of the 329 Las Palmas residents and their families returning from their daily work, school and family activities. This local travel pattern will not show in the standard traffic statistics used by traffic Engineers.
Access Requirement.

Two full lanes in (one for checking visitors in with the guard and the other for by pass traffic showing corret "resident passes") and two lanes out are required. Similar care homes in the area "card in" and Card out" visitors to the Carehome.
A larger Guard Gate Office is required to cope with 3 shift personnel and the ability to card out traffic leaving from the "Carehome".

2.6.2 Emergency Access and Egress

The addition of the proposed development and its operational traffic will change the River Road traffic paterns particularly at the several peak times.
There are two accesses to Las Palmas I.

a) The North access has a control traffic light on to River Road and
b) The second access, a few hundred yards south, has no control and in busy times is very difficult for Las Palmas residents to leave.

86.47

During a catastrophic event, (Fire, Earthquake,flood etc) it will be difficult to evacuate the 329 home owners (600 people or more), let alone also the more remote patients, employees and visitors (up to another 400 people) on the proposed development.
In this case there is no back door road to the proposed development, as other such developments often have, all must compete with local residents also wishing to leave. And it may be dark. Further, at the same time emergency crews will be trying to enter the complex via the single lane off ramp from River Road
This has to be considered a recipe for a dangerous disaster for all.

Appendix 1

Reference: D.C.Dalby - P. Eng, NS PE - - **Bio**
Degree in Electrical, Communications and IT Engineering.
plus many Post Graduate training courses at UBC; KOAU and in Management and Techology.

Experiences : - some 50 years as Senior Professional Consulting Engineer (Technology and Land Use)

Land Use A) 17 years experience in Resort design and operations with Kampgrounds of America - -expanding from 500 - 750 resorts; Board adviser to the CAO.

B) 2 1/2 years on the Development Commission of the Resort Municipality of Whistler - during construction of 11 large resorts; Marriot, Hilton etc Whistler - is North America's largest Ski Resort.

C) 20 years experience in Home Owner Associations Board Operations and Management, including the Las Palmas I Board.

Technology:- Consulting and contract work for over 40 years, specifically in voice and Data communications and Information technology, plus Industrial Electrical Controls and Emergency Communications in several jurisdictions.

Letter 86

COMMENTER: David C. Dalby

DATE: April 20, 2018

Response 86.1

The commenter states that they have prepared a report detailing their concerns with the project.

The individual concerns raised by the commenter are listed and addressed below in the subsequent comments and responses.

Response 86.2

The commenter introduces the report that they have prepared and states that their conclusions differ from the conclusions in the Draft SEIR. The commenter states that residents of the proposed project would not have nearby access to services. The commenter states that they have included material in their report that is not related to CEQA.

This comment does not specifically conflict with or challenge the analysis and conclusions in the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Regarding material not related to CEQA, the focus of this Final SEIR is to address comments pertaining to environmental issues, or adequacy of the Draft SEIR or CEQA process. Therefore, comments on issues outside of the scope of CEQA are not responded to in detail.

Response 86.3

The commenter states that the Draft SEIR contains errors, omissions and judgments. The commenter states that a 2016 survey of Subdivision homeowners found that 93 percent opposed the project, and that a 2017 survey found that 72 percent opposed the project.

This comment does not provide specific errors, omissions, and judgments to respond to, and therefore does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 86.4

The commenter states that the Draft SEIR incorrectly describes the developer as a member of the LPHOA. The commenter states that the developer does not have voting or management rights in the LPHOA. The commenter states that the project's residents and visitors would not have access to the trails and sidewalks of the Subdivision.

Please refer to Topical Response I. As noted therein, a written agreement between the LPHOA and the applicant would be necessary in order to clarify cost-sharing and responsibilities associated with the streets that are under the control of the LPHOA. Such an agreement is not currently in place. It is outside of the scope of the Draft SEIR to facilitate an access agreement between the applicant and the LPHOA.

Response 86.5

The commenter states that the Subdivision is not fully developed, as is stated in Section 2.2 of the Draft SEIR. The commenter states that the project site should have residential development rather than the proposed project.

The commenter does not specify what parcels, other than the project site, are undeveloped. The commenter's statements about alternative development potential on the project site do not conflict with or challenge the analysis in the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 86.6

The commenter states that there are limits to California American Water's guarantees to serve the project site and the Subdivision. The commenter requests more detail about water supply and fire protection.

An updated will-serve letter from California Water Service dated March 26, 2019 is provided in Appendix I-2 The letter indicates that the letter shall remain valid for two years, and that Cal Water reserves the right to rescind this letter in the event its water supply is severely reduced by legislative, regulatory or environmental actions. However, in its Urban Water Management Plan California Water Service projected its groundwater supply for the Salinas District will fully meet future demands through 2040. Please refer to Response 3.3 for additional discussion.

Response 86.7

The commenter states that the wastewater treatment plants on River Road will be closed, and that the Las Palmas treatment plant has limited capacity. The commenter states that the project cannot use the plant. The commenter states that the project site has no natural water supply.

The project would use recycled water from the Las Palmas treatment plant. The potential for the treatment plant to close is speculative. Nonetheless, the water demand calculations include irrigation, and thus, the Draft SEIR (Section 10.0, *Water Supply*, page 10-12) analysis does not assume the use of recycled water. Impacts to water supply would be still be less than significant, with or without the availability of recycled water.

Response 86.8

The commenter states that the project is at risk for fires and has a dangerous egress route. The commenter states that the applicant has not done enough to reduce fire hazards.

Please refer to Topical Response B. As noted therein, the proposed site plan has been designed to comply with the County's fuel modification standards (Title 18, Chapter 18.56.090 *Fuel Modification Standards*) to minimize potential wildfire hazards on the project site and vicinity.

Please refer to Topical Response D. The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project.

Response 86.9

The commenter states that the project site has mudslide and risks, and asks why the applicant is not required to install concrete dams to address these risks.

Please refer to Topical Response E. As noted therein, 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, including slope stability and landslides. The installation of concrete dams is not required, as there is no impact.

Response 86.10

The commenter discusses emergency evacuation concerns related to the large number of residents that would occupy the senior living center. The commenter notes that the project site is on a steep incline that would be difficult for firefighting equipment to navigate.

The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. Furthermore, the Monterey County Regional Fire District (MCRFD) reviewed the proposed site and building plans for the project as part of the County's review process and determined that MCRFD would be able to provide fire protection services to the project and vicinity. Also refer to Topical Response D.

Response 86.11

The commenter states that because the Las Palmas wastewater treatment facility is scheduled to close, the Draft SEIR's statement that the project would use recycled wastewater for irrigation is false. The commenter states that there are no physical plans for dealing with the project's wastewater.

California American Water has stated that it will provide wastewater service to the project (see Appendix G of the Draft SEIR and Appendix I-2 of the Final SEIR). Therefore, continuous wastewater service can be reasonably anticipated, including during and after any changes to facilities.

Response 86.12

The commenter states that the Subdivision's stormwater drainage facilities do not have available capacity, and that the Draft SEIR does not describe stormwater drainage for the project.

A Conceptual Stormwater Control Plan was prepared for the project as part of the preliminary design to address stormwater management for the project site and is provided in Appendix I-1. Please also refer to Topical Response E.

Response 86.13

The commenter states that the project is not an appropriate land use for the site, and asks why the project site is not being developed in accordance with the LPRSP.

Please refer to Topical Response C for a discussion of land use compatibility, including a discussion of the LPRSP Plan Area. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 86.14

The commenter states that the Subdivision entrance is already a dangerous intersection and would be worsened by the project. The commenter states that it would be impossible to safely evacuate the Subdivision in the event of an emergency.

Please refer to Topical Response D. The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project.

Response 86.15

The commenter states that the original Subdivision developer was required to install concrete structures to prevent mudslides. The commenter asks why this is not a requirement of the proposed project.

Please refer to Topical Response E. As noted therein, 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, including slope stability and landslides. The installation of concrete dams is not required, as there is no impact.

Response 86.16

The commenter states that the project is an inappropriate land use and that the senior living center residents would not have access to services. The commenter states that due to climate change and the site's steep slopes, the project site has a high degree of risk for fire and flood hazards.

Please refer to Topical Response E. As noted therein, the project includes on-site stormwater control measures designed to achieve zero net increase in the rate of stormwater discharge relative to pre-project conditions. This would reduce the potential for runoff from new development to exceed the capacity of storm drainage facilities and contribute to off-site flood hazards.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 86.17

The commenter states that the project site should be developed with residences in accordance with the LPRSP, and that the project should be moved to a more welcoming area.

Regarding the residential unit cap of the LPRSP, refer to Topical Response C. As noted therein, the proposed project is not a residential use under the County code or LPRSP; as such, the residential unit limitation of 1,031 does not apply to the project.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

Response 86.18

The commenter provides an overview of the communication that has occurred between the LPHOA and the project applicant.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. Therefore, no further response is required.

Response 86.19

The commenter states that the project would exceed thresholds of significance for aesthetic impacts. The commenter states that the project would be visible from surrounding homes and from scenic highway SR 68.

Please refer to Topical Response F regarding aesthetic impacts. As stated therein, potentially significant aesthetic impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Response 86.20

The commenter states that the project would be ridgeline development, which is not allowed in the area. The commenter notes that River Road is designated as a "Wine Corridor" and that SR 68 is designated as a scenic highway.

Please refer to Topical Response F regarding scenic resources and ridgeline development. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting. Further, while the project site is naturally elevated, nearby hills of substantially greater elevations would shield the site, with views of the site only momentarily visible to moving vehicles.

Response 86.21

The commenter states that the project would result in traffic that passes by the historic Corey House.

Please refer to Topical Response D regarding project site traffic access along Woodridge Court. As noted therein, the proposed project would not substantially increase safety hazards for pedestrians and bicyclists, including people accessing Corey Park. Please also refer to Response 30.3 regarding the historic nature of Corey House.

Response 86.22

The commenter states that the access road to the project site is a farm road built in the 1880's that would be impacted by construction of the project. The commenter describes various sources of traffic associated with construction and operation of the project.

Please refer to Topical Response D. As noted therein, truck trips routed through the Subdivision during construction could contribute to deterioration of private residential streets maintained through homeowners' association fees. However, as a standard grading and building permit condition, the County would require that the project applicant be responsible for repairing any damage to existing infrastructure during the temporary construction activities. Adherence to this condition of approval would prevent long-term deterioration of the circulation system from construction activity.

Additionally, please refer to Topical Response D for a discussion of a separate entry for the project. As noted therein, a separate entry is not available for the project applicant, nor is it necessary to avoid traffic impacts.

Response 86.23

The commenter states that the Draft SEIR's finding that lighting impacts can be mitigated is incorrect. The commenter states that the project would result in lighting that would disturb Subdivision residents.

This comment is noted. Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

Response 86.24

The commenter states that the Draft SEIR's less than significant findings for noise impacts are incorrect. The commenter states that the project would result in high noise levels during construction and would also result in high noise levels during operation because the facility's alarm systems would require regular testing and use.

Please refer to Topical Response H for a discussion of the project's potential short- and long-term noise impacts. As described therein, construction and operational noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 86.25

The commenter states that commercial development has been avoided by the residential owners. The commenter states that the Subdivision homeowners do not want the proposed project to be built.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 86.26

The commenter states that the LPHOA limits the work hours for contractors working in the Subdivision, but that the project would not be obligated to abide by those limits.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 86.27

The commenter states that climate change is introducing a variety of risks to the region.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration. Air quality and greenhouse gas impacts are addressed in Sections 6.0 and 8.0 of the Draft SEIR, respectively.

Response 86.28

The commenter describes the region's wildfire hazards and states that a fire would result in loss of life at the proposed senior assisted living facility.

Please refer to Topical Response B. As stated therein, the proposed site plan has been designed to comply with the County's fuel modification standards (Title 18, Chapter 18.56.090 *Fuel Modification Standards*) to minimize potential wildfire hazards on the project site and vicinity.

Response 86.29

The commenter states that climate change will bring extreme precipitation and winds that would impact the project site. The commenter describes mudslide hazards at the project site, including recent instances of mudslides.

Climate change is discussed in Section 8.0, *Greenhouse Gas Emissions,* of the Draft SEIR. Please refer to Topical Response E. As noted therein, 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, including slope stability and landslides.

Response 86.30

The commenter asks why the project is not required to include mudslide- and flood-prevention components.

Please refer to Topical Response E. As noted therein, 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, including slope stability and landslides. The project would be required to comply with all applicable requirements relating to slope stability and runoff control.

Response 86.31

The commenter states that the project is not compatible with the surrounding residential development.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 86.32

The commenter states that the project would impact property values in the Subdivision. The commenter discusses the value of the project site.

Please refer to Topical Response C. As described therein, property value is not an environmental impact and therefore is not analyzed in the Draft SEIR.

Response 86.33

The commenter states that there have been 24 accidents at the Subdivision entrance in recent years. The commenter states that the project would result in queuing at the intersection.

Please refer to Topical Response D for a discussion of queuing concerns at the Subdivision's entry gate. As noted therein, the project would increase inbound traffic at the gate by an estimated 16

percent. However, this increase in traffic would not substantially increase queuing. An additional westbound entrance lane at the gate would not be needed, and queuing vehicles would not obstruct vehicles from turning left onto Winding Creek Road. Therefore, the project would have a less than significant impact on traffic circulation related to queuing.

Response 86.34

The commenter states that the project would displace and destroy the site's abundant wildlife, including rare species.

Please refer to Topical Response G and Section 7.0, *Biological Resources,* of the Draft SEIR. As described therein, the project's impacts related to wildlife would be limited due to the size and placement of the project site. To reduce potential impacts to special status wildlife species, the Final SEIR includes mitigation measures, as listed in Section 4, *Amendments to the Draft SEIR*.

Response 86.35

The commenter states that the project would lock away its residents with no social interaction.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 86.36

The commenter states that evacuation of the senior living center's residents and staff would be catastrophic due to the narrow access road. The commenter expresses doubt that busses could be used efficiently for an evacuation, and states that the project raises safety risks for the Subdivision residents as well.

Please refer to Topical Response D. The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. Additionally, Mitigation Measure T-2 has been added and is described in Section 4, *Amendments to the Draft SEIR* of this document.

Response 86.37

The commenter states that the project is ridgeline development and is visible from roads with scenic route designations. The commenter states that the existing regulations about scenic routes and ridgeline development should be enforced, and that not enforcing these rules would adversely impact the area's tourism industry.

Impacts to scenic vistas and visual character are discussed in Section 5.0, *Aesthetics,* of the Draft SEIR. In addition, as noted in Topical Response F, taking into account the limited visibility of the project site from public viewing areas, the project would not be considered ridgeline development given vegetative shielding, intervening topography, and the mitigation measures to reduce visual impacts.

Response 86.38

The commenter states that the project would have impacts related to hydrology. The commenter expresses the following concerns related to water supply: the area is in a drought, and water resources in Salinas Valley Zone 2C are in overdraft; the "letters to serve" from the water supplier are limited in time; existing water uses cannot be re-assigned; recycled wastewater may not be available for irrigation purposes; Cal-Am has announced that they will be closing their wastewater treatment facilities on River Road.

Please refer to Responses 86.6, 86.7, 86.11 and 86.12.

Response 86.39

The commenter states that there are existing stormwater control risks at the project site, and that the developer has been reluctant to take responsibility for stormwater control.

Please refer to Response 86.12 and Topical Response E.

Response 86.40

The commenter states that an earthquake has caused a mud wall to fall onto a storm drain at the site. The commenter states that this event did not close the drain, but it did illustrate the constant stormwater control risks.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. No response is required.

Response 86.41

The commenter states that the project conflicts with the LPRSP, which planned development of 1,031 residences, because it includes 13 Casitas consisting of 26 individual units, which would bring the overall development in the Subdivision past its limit. The commenter states that the County requires that land uses be compatible with adjacent land uses, and that the project would violate this policy.

Refer to Topical Response C. As noted therein, the proposed project is not a residential use, and the LPRSP residential unit limitation of 1,031 does not apply to this project

Response 86.42

The commenter states that the project is ridgeline development, which is prohibited. The commenter states that the project would be a "blot on the landscape."

Please refer to Response 86.37.

Response 86.43

The commenter discusses the topic of access to services and community engagement for senior living center residences.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 86.44

The commenter states that the parcel was intended for development of five high-end homes, and that such a development would be compatible with the investment made by Subdivision homeowners.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 86.45

The commenter states that utilities services would not be available to the project site, because utility services are reserved for a future commercial development on the commercially zoned lots owned by the Subdivision landowners.

The comment does not specify what utilities are in question, and does not provide sufficient description of a conflict regarding utility service to respond to. It is not anticipated that any utility service providers would be unwilling or unable to serve the project.

Response 86.46

The commenter lists the CEQA thresholds of significance for traffic impacts. The commenter states that traffic estimates provided by the developer are flawed, and that River Road is inadequate for coping with the project's traffic impacts. The commenter states that the project's staff will use private vehicles, rather than buses. The commenter states that visitors to the senior living center will also add traffic, and that visitor hours will coincide with the commuting times of Subdivision residents. The commenter states that a larger guard gate office will be required at the Subdivision entrance to cope with the increased traffic.

Refer to Response 7.2 for discussion of the Draft SEIR's methodology for estimating trip generation. As discussed therein, this methodology accounts for typical trip generation by staff at a senior living community. Therefore, the traffic analysis does not underestimate trip generation by staff.

Refer to Topical Response D for discussion of traffic impacts on Subdivision streets and at the entry gate. As discussed therein, the project would not result in traffic congestion that exceeds applicable standards for Subdivision streets, and it would not require physical changes to the gate to accommodate additional inbound traffic.

Response 86.47

The commenter states that during a catastrophic event it would be difficult to evacuate the senior living center residents and the existing Subdivision residents.

Please refer to Topical Response D. The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project.

April 20, 2018

From: Luis and Veronica Ramirez
21009 Country Park Road
Salinas, CA 93908

Letter 87

To: Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place
Salinas, CA 93901

Cc: Brandon Swanson, Planning Manager

Re: RVLP Draft SEIR for proposed development of Riverview at Las Palmas (PLN#150372

Dear Mr. Sidor,

I am writing to you to express my concern over the proposed development Riverview at Las Palmas (PLN#150372). We are located steps from Woodbridge Road where the traffic for this proposed development will be funneled. I feel using the single entrance to Las Palmas I for current residents as well as residents of this facility, service vehicles, employees, visitors etc., will cause undue traffic, safety, and security issues for our community. We selected Las Palmas to be in a quiet and safe neighborhood where our children could be surrounded by nature. Our children enjoy playing in Corey Park (the development's largest open space), which requires us to cross Woodbridge Road. Should traffic to this proposed facility be allowed to funnel through this road I would no longer feel comfortable allowing my children to play at Corey Park. 87.1

We have a single-entry point for Las Palmas I with a single security guard that LPI residents pay to keep us safe and secure and who denies any unwanted visitors to our neighborhood. I cannot imagine the backlog of traffic that would occur on River Road as residents, visitors, service vehicles, etc. need to be checked in by this single guard. It would wreak havoc on our community.

The nature of this facility would also require trips/visits by emergency vehicles. During an emergency I doubt those operators would be concerned with security checkpoints, speed limits, or noise due to sirens when they are trying to save a life. I moved to LPI to avoid my children growing up listening to sirens blare as are so often, unfortunately, heard in Salinas. I am also fearful of evacuation capability as our community stands now. I think this threat would be increased if this development were allowed to proceed as planned. 87.2

My final point is that this proposed facility is not residential in the spirit of our current community. The number of units coupled with staffing and service vehicles is clearly a commercial project. 87.3

I would request that the developer find another location for his proposed facility.

Thank you for taking the time to consider these concerns. I look forward to your reply.

Regards,

Veronica Ramirez

Veronica Ramirez
Homeowner

Letter 87

COMMENTER: Veronica Ramirez

DATE: April 20, 2018

Response 87.1

The commenter states that using the Subdivision entrance as the access route to the project site would cause traffic, safety, and security issues. The commenter states that if traffic to the senior living center moves through Woodbridge Road, they will no longer feel comfortable allowing their children to play at Corey Park.

Please refer to Response 84.10, Topical Response A, and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Regarding traffic along Corey Park, please refer to Topical Response D. As noted therein, the proposed project would not substantially increase safety hazards for pedestrians and bicyclists, including people accessing Corey Park.

Response 87.2

The commenter states that the senior assisted living facility would require emergency vehicle trips, and that emergency vehicles would cause noise and safety impacts. The commenter states that the project would make evacuation of the Subdivision more dangerous.

Please refer to Topical Response A for a discussion of the project's impacts on security operations and emergency access, and Topical Response D for a discussion of impacts on emergency evacuation. The project would not result in a significant impact on police service or emergency preparedness within the Subdivision. Regarding the Subdivision's private security operations, an agreement would be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 87.3

The commenter states that the project is an inappropriate land use because it is a commercial project.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Letter 88

Shelley Donati
21020 Country Park Road, Salinas, CA 93908 831.902.5527 shelleydonati@hotmail.com

April 20, 2018

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901

CC: Brandon Swanson, Planning Manager;
Jacqueline Onciano, Chief of Planning
Carl Holm, Planning Director
Roy Gobets, Las Palmas Ranch Homeowner

RE: Response to RVPL EIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr. Sidor,

As an active community member, I have grave reservations about the development of Riverview at Las Palmas which is being proposed for consideration. There are many points of view to consider in this complex project, and I wish to focus my comments on a few issues that are highly sensitive for me: **safety and security, traffic, and modification to the skyline.**

I moved into this community when I returned to California five years ago. I was attracted to the small neighborhood community, tucked into the sunbelt, giving me access to the beautiful, scenic coastline a short drive away. As a resident on Country Park Road (backing up the proposed development), part of the attraction of this location is the peaceful, serene setting, as I work from home. When I looked at the development, I looked at the Las Palmas Specific plan, understanding that it was essentially built out with the exception of this once parcel that had been permitted several years ago for a private residence. Safety for me a single woman continues to be a primary concern for me, which is one of the reasons I chose this gated community with such close proximity to the city limits of crime-ridden Salinas. I am out daily, enjoying the greenspace that has been designated for community members to enjoy, and I was pleased to learn that the HOA had purchased what we commonly known today as Corey Park (at the entrance to neighborhood, adjacent to the gate house) to maintain the privacy and security of our neighborhood. 88.1

While I'm fortunate to not have to partake in an arduous daily commute, I do go into South Salinas most days. Returning safely at peak times of the day is a challenge, exiting highway 68 westbound at River/Reservation Road. The signal light causes severe back up onto the shoulder and even the highway at times. As for River Road at Las Palmas intersection, accidents are all too common and the times I've witnessed careless drivers run red lights is innumerable. The developer is estimating 300 vehicle trips per day to the facility, and, while that number feels conservative after hearing about residents and employees, I shudder to think of the safety consequences of that impact on our roadways. 88.2

Shelley Donati
21020 Country Park Road, Salinas, CA 93908 831.902.5527 shelleydonati@hotmail.com

It cannot be disputed that this parcel of land was sold for residential development and has access deeded to the property through our neighborhood. However, this property is part of Las Palmas Ranch should therefore be subject to the Las Palmas Specific Plan, which according to the most recent numbers shows 997 of 1000 designated homes on the 1000 acres to have been built. Not to mention that this skyline is clearly visible as part of the scenic highways, and the removal of 80 eucalyptus tree and constructing on the skyline grossly compromises this scenic route. 88.3

Changing the zoning to allow a commercial business to operate on this property when it's only access is through a residential neighborhood is ludicrous. It severely compromises the quality of life, the safety and the environment of the Las Palmas Ranch Phase I residents.

Please understand, I am not opposed to additional assisted living facilities in Monterey County; however, this is not the appropriate location for such a community—without close proximity to services, up a steep incline for emergency vehicles to maneuver at all hours and jeopardizing the health and safety and current residents. I humbly request that you consider the current zoning, the Las Palmas Specific Plan, the recommendations of LUAC and the voices of those impacted by the construction and operation of an assisted living facility in this location and decline the project proposal. 88.4

Regards,

Shelley Donati
Resident
Las Palmas Ranch Phase I

Letter 88

COMMENTER: Shelley Donati

DATE: April 20, 2018

Response 88.1

The commenter describes the existing safety and security of the Subdivision.

As the comment pertains to a description of the existing Subdivision, this comment does not address the analysis and conclusions of the Draft SEIR. However, refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision. Regarding the Subdivision's private security service, refer to Topical Response I, which discusses the project applicant's responsibility to share in the LPHOA's security costs.

Response 88.2

The commenter states that there are existing traffic concerns at the SR 68 exit onto River Road (Reservation Road) and at the Subdivision entrance. The commenter states that the developer's estimate of 300 vehicle trips is conservative, and that the project's traffic impacts are a safety concern.

Please refer to Topical Response D regarding potential impacts to SR 68 and River Road. As stated therein, the project would result in LOS C traffic conditions at the intersections of SR 68 ramps with Reservation Road, which would be acceptable. In addition, vehicle trips generated by the project would increase the existing volume of inbound traffic at the gate by an estimated 16 percent (Higgins 2017, 2019). Las Palmas Road has enough capacity to accommodate these additional trips without resulting in substantial queuing in front of the gate, or in blockage of vehicles turning into or out from Winding Creek Road. As a condition of approval of the project, the County would require employees at the senior living community to display windshield tags. This condition of approval would eliminate the need to check each employee's vehicle, reducing the length of queues at the gate. Because queues would not be significantly increased as a result of the project, they would not cause additional congestion and accidents.

Response 88.3

The commenter states that the project site should be subject to the LPRSP, which already has 997 of 1,000 designated homes built. The commenter states that the removal of 80 eucalyptus trees and construction of the project would compromise the scenic view, which is visible from a scenic highway.

Regarding the residential unit cap of the LPRSP, refer to Topical Response C. As noted therein, the proposed project is not a residential use under the County code or LPRSP; as such, the residential unit limitation of 1,031 does not apply to the project.

Please refer to Topical Response F regarding scenic views of the site. As stated therein, impacts associated with tree removal and construction of the project to scenic resources and private views would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Response 88.4

The commenter states that they are not opposed to adding assisted living facilities in Monterey County, but that the project site is not an appropriate location. The commenter states that the project site would not provide access to services for the residents, and that emergency vehicles would have to maneuver a steep incline to access the site.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements. In addition, as noted in Response 8.11, the project site is appropriate for an assisted living facility, given market factors.

Please refer to Topical Response D for a discussion of impacts on emergency evacuation and emergency access. The project would not result in a significant impact on emergency preparedness within the Subdivision and would maintain adequate emergency access routes to the project site.

Otavio and Leila Bernardo
17539 Sugarmill Road
Salinas, CA 93908

Letter 89

Date: 04-21-2018

To: (Sidorj@co.monterey.ca.us),
Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262
Cc: Jacqueline Onciano, Chief of Planning, oncianoj@co.monterey.ca.us Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us Roy Gobets, roygobets@aol.com

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Mr. Sidor,

We, Otavio and Leila Bernardo, are homeowners in Las Palmas 1. I, Otavio, am a fire protection contractor who specializes in the design, installation, maintenance and monitoring of alarms, fire protection systems, and low voltage systems. I have been working in this industry for over 20 years and have worked on several projects such as the one under discussion. 89.1

We are writing this letter to voice our opposition to the proposed development of Riverview at Las Palmas 1. We are aware and understand that at some point in life, we might all seek the services that such a facility offers. We value, love and cherish the elders in our life. We also believe that it is our responsibility to care for them as they cared for us. However, the magnitude of the proposed project and location, we believe, would not be a good fit for the residents of Riverview and the residents of Las Palmas 1 for the reasons described below.

Las Palmas 1 is a peaceful rural residential neighborhood with 329 homes located in low-lying pastoral setting along River Road. It is a place where residents can escape the noise and busyness of the city and relax in the tranquility of their properties. We bought our property here 15 years ago because of the peaceful rural lifestyle in which we wanted to raise our family and eventually retire. I also would like to add that I have a sleeping disorder, and light, noise and smell adversely affect my condition. 89.2

The proposed assisted senior care living facility **with 142 beds** in the heart of the community would have a major impact and would lower the quality of life that we and our neighbors have enjoyed. We ask you to read and respond to our concerns and to take into careful consideration

the enormous negative and significant environmental impact that such a commercial operation would have on a residential community.

In addition, the approval of this project against the wishes of most of the homeowners in Las Palmas 1 will encourage future litigation against the County of Monterey for approving a project that clearly violates Monterey County land use regulations and the California Environmental Quality Act (CEQA).

89.3

Violation of Monterey County Codes

- L.U.-1.4: Growth areas shall be designated only where an adequate level of services and facilities such as water, sewerage, fire and police protection, transportation, and schools exist or can be assured concurrent with growth and development.

- L.U.-1.5: Land uses shall be designated to achieve compatibility with adjacent uses.

- L.U.-1.11: Development proposals shall be consistent with the General Plan Land Use Map designation of the subject property and the policies of this plan.

- LU-2.19 The County shall refer amendments to the General Plan and zoning changes that would result in the creation of new residential, industrial, or commercial areas to the nearest cities for review and comment.

- L.U.-2.23: Medium Density Residential (MDR): Medium Density Residential areas are appropriate for a range of residential uses (1-5 units/acre) and housing types, recreational, public and quasi-public, and other uses that are incidental and subordinate to the residential use and character of the area. The extent of use of land for this designation shall be limited to building coverage of 35% of the subject property.

- OS-1.2: Development in designated visually sensitive areas shall be subordinate to the natural features of the area.

- OS-1.3: To preserve the County's scenic qualities, ridgeline development shall not be allowed.

- T-1.6: Existing legal lots of record located in the critical viewshed may transfer density from the acreage within the critical viewshed to other contiguous portions of land under the same ownership, provided the resulting development meets all other Toro Area and General Plan policies.

- T-3.1: Within areas designated as “visually sensitive” on the Toro Scenic Highway Corridors and Visual Sensitivity Map, landscaping or new development may be permitted if the development is located and designed (building design, exterior lighting, and siting) in such a manner that will enhance the scenic value of the area.

89.4

Project Comparison

The proposed project will have the capacity of housing 142 residents with 142 beds as part of a senior care assisted living community. If we look at either the Natividad Medical Center or the Salinas Valley Memorial Hospital, which can accommodate 137 beds and 225 beds, respectively, we can see that this senior care assisted living with a memory care facility project in the grand scheme of things is extremely large. Even though the hospitals provide medical services that this facility will not, the proposed 3-story memory care facility is a medical care facility. Doctors, nurses and caregivers will be a major part of the staff thereby generating a significant unavoidable impact on public services including water, traffic and emergency services.

89.5

25%-30% Population Increase

In Las Palmas, there are 329 homes with an estimated 1,000 residents. The proposed project will add an additional 142 residents, 92 employees, and vendors and visitors, which will add up to approximately 300 additional people to the community. This is an additional 25-30% of our total population in this very small residential community. This would be equivalent to adding 40,000 new residents to the city of Salinas without taking into consideration traffic, police, fire, disaster preparation, and infrastructure.

89.6

Water Supply Quality and Quantity

The proposed project will negatively affect the demand on the groundwater basin and consequently affect groundwater availability for existing and approved communities. Based on the projected population increase of 25-30%, it can be determined that water consumption in Las Palmas 1 will have more than a 10% increase. This increase in water consumption will further impact the quality of water in the entire basin. Further, the Public Utilities Commission (PUC) states that a 10% increase in production of an existing system requires the production of a Water Supply Assessment (WSA). A Water Supply Assessment (WSA) has not been prepared for the proposed facility which is required under SB 610 and California Water Code section 10910. A hydrogeologic report is needed to determine the viability of a long-term water supply of suitable quality for the proposed project. This should be an evaluation of the site-specific water supply. The location of this project is within Zone 2C. According to provided reports from Brown & Caldwell's State of the Salinas River Groundwater Basin report, Zone 2C is out of hydrologic balance, meaning that there is an unbalanced ratio of salt water to fresh water in the basin. Due to the already high usage of fresh water from this basin, the level of salt water intrusion into the fresh water is high, which has already reduced the overall quality of our water. Additionally, the basin is in severe overdraft and seawater intrusion is threatening the quality of water extracted from the aquifers. This is a significant and unavoidable environmental impact.

89.7

We feel that the applicant is relying on the Can and Will Serve letter from Cal Water. A Can and Will serve letter does not guarantee service. A long-term water supply of suitable quantity and quality must be proven. The water supplier must determine whether these supplies are acceptable as to quality, quantity and reliability. The State Water Code requires that the County shall

determine, **based on the entire record**, whether projected water supplies will be sufficient to satisfy the demands of the project, **in addition to existing and planned future uses**.

The Salinas Valley Ground Basin is in an overdraft condition. The California Department of Water Resources (DWR) has designated the 180/400 Foot Aquifer Sub basin as Critically Overdrafted Basin. The Sustainable Groundwater Management Act (SGMA) requires that a Groundwater Sustainability Agency (GSA) be formed to manage the Salinas Valley Groundwater Basin by June 2017, and that the GSA must file a Groundwater Sustainability Plan with DWR by January 2020.

- Is there sufficient hydrological evidence of acceptable water quality and quantity (sustained yield) to serve the proposed project?
- Can the new development be served by an identifiable, available, and long-term water supply?
- Will the proposed development result in an individual and cumulative impact to the aquifer's long-term safe yield level, seawater intrusion and long-term maintenance of local priority agricultural water supplies?

Until these questions are answered, there is no way to determine if there is sufficient water to serve this project.

Public Services

Fire

Due to an estimated 400+ trips directly and indirectly on Highway 68, the response time will be delayed even further from the Toro or Laureles Station located at State Route (SR) 68 . Further analysis needs to fully study the significant impacts to fire/medical services. Response time is a combination of travel time and get-away time (the time it takes the engine to leave the station once an alarm is received). 89.8

Does the Toro Station maintain a population to staff ratio standard required? Do these stations have adequate staffing to provide adequate emergency response to fires, medical incidents, rescues, vehicle accidents, hazardous materials incidents, disasters (floods, earthquakes, etc.)? Is the station equipped with ladder trucks required for 3-story high density structure?

For emergency medical services, do these stations have engines that are equipped with a full complement of first responder medical supplies including CPR equipment, semi-automatic defibrillators and rescue equipment such as Jaws of Life?

Draw down of fire/rescue resources from the MCRFD to augment and provide an adequate level of service to back-fill this project will take away critical fire and life safety services to the existing regional area taxpayers. Reflex time (time it takes from the initial 911 citizen call to on-scene arrival and set-up) is a significant issue to provide adequate fire and life safety services from the MCRFD with no fiscal or financial off sets.

Medical services which are provided for the existing population will be adversely impacted with the spike in population. The proposed 142 senior assisted care facilities complex with 250 residents counting the employees (quarter of the population of this neighborhood), will have a significant impact on fire protection and/or medical services. Therefore, we feel the EIR is deficient.

Police

The Monterey County Sheriff's Office (MCSO) services the project area and is located within Beat 4. Currently, there is one and a maximum of two deputies per shift covering the Beat 4 area. The increased caseload and additional patrol area associated with the project will negatively affect the MCSO's response times.

89.9

The MCSO has established a target ratio of one deputy per 1,000 persons. However, industry standards for law enforcements services with this type of facility usually require additional police officer staffing in the 2 staff per 1,000 population ratio. To meet response times and maintain a service standard of one deputy per 1,000 persons, additional deputies will be needed to serve the current population.

Noise Pollution

89.10

The proposed 3-story memory care facility, the 2-story senior care assisted living, and the 13 casitas are considered commercial due to their application, and per California Building and Fire Codes they will most likely be classified as Type R2.1.

R2.1 Explanation

R-2.1 Facilities housing clients on a 24-hour basis in a supervised environment that provides personal care services. May contain more than six non-ambulatory and/or bedridden clients, including,

Assisted living such as:
Residential care facilities
Residential care facilities for the elderly (RCFE's)
Adult residential facilities
Congregate living health facilities
Group homes
Residential facilities for the chronically ill
Congregate living health facilities for the terminally ill

For such a building classification (R2.1), the following are the fire alarm requirements:

- A manual fire alarm system monitored for fire dispatch 24x7 (e**ntire facility**)
- An automatic fire alarm system (smoke and heat detectors, with full coverage), including all sleeping rooms and all common public areas monitored for fire dispatch 24x7 (**memory care facility**)
- Automatic smoke detectors in all corridors, hallways and public areas monitored for fire dispatch 24x7 (**2-story senior care assisted living**)
- Single station smoke detectors (120 volts AC powered) with battery backups **(in the casitas and the sleeping rooms in the 2-story senior care assisted living)**
- Single station smoke detectors with battery backup **(all sleeping rooms except memory care building)**
- Notification appliances (horns, strobes, horn strobes combinations or chimes); the required sound level for notification appliances are 70 decibels "at the pillow" in each sleeping room; there is also a required decibel level for all other notification appliances which is 15% above the listed ambient level for all public areas (e**ntire facility**)
- Delayed egress doors with local alarms connected **(memory care facility facility**)

All of the above minimum requirements must be complied with without compromises or variances to comply with California Fire Code and NFPA 72 National Fire Protection Association and must be cleared with the Local Fire Department before State licensing would allow the occupancy of such facility. The proposed 3-story memory care facility and the 2-story senior living facility will have **150 or more** automatic smoke detectors as part of an automatic fire alarm system. If any detector in a building is activated, it will automatically trigger the fire alarm system in the entire building for evacuation, and all the notification devices (horns, strobes, and or chimes) will be sounding until the fire department arrives. Every fire alarm signal must be verified by the fire department, which means a fire engine and will be dispatched to the location. Such noise levels will be easily heard by Las Palmas 1 residents. For example, Chateau Coralini located in Las Palmas 1 has an automatic fire alarm system that has gone off several times, and noise has traveled throughout Parkside. Chateau Coralini is a small vacant building in comparison with what is currently being proposed.

<u>Delayed egress door systems (memory care facility)</u>

Similarly, per code, the proposed facility will be equipped with delayed egress door alarms. This type of automatic door release system prevents people from being trapped inside a building. If a resident or employee rests on such a door for more than 5 seconds, an alarm will sound, and the door will open. A staff member will have to manually turn off the system with a key. Again, this is a loud and noisy alarm that we, the residents of Las Palmas 1, will be subjected to.

89.11

Emergency Power Generator

Should it be required, the proposed 3-story memory care facility will also have a diesel or gas generator as a means of power backup. These generators normally self-start twice a week for about 30 minutes each time. This also is a source of noise pollution. And depending on where the generator is installed, the noise will travel and be heard by the residents of Las Palmas 1. 89.12

With all the fire alarm detection, evacuation, and all other alarm devices that this facility will require and or will have, the probability of multiple alarms sounding daily is extremely high. Most facilities with these types of systems do experience these alarms all the time. The noise level that these systems will generate is high, not to mention the noise from the emergency vehicles which will be dispatched when alarms or emergency are detected.

Other systems that will impact the noise level are:

- Security local alarms for all windows or screens **(memory care facility**)
- Nurse Call Systems or emergency pull cords **(entire facility)**
- Paging and alert systems
- HVAC systems
- Commercial kitchen with exhaust and makeup air system as part of a commercial kitchen hood system
- Vehicles: service trucks and delivery trucks with built-in refrigeration

All the above-mentioned will greatly impact the daily lives of the residents of Las Palmas 1. We are greatly concerned that studies determining the noise impact of such a facility on our residential area have not been conducted and shared with the residents. This should have been the first step. We, like many others, moved to Las Palmas 1 due to the location, safety, and the peaceful and quiet environment that this community has to offer.

For any clarification on the points mentioned above, we would strongly urge you to consult with Salinas Rural Fire since they are the AHJ (Authority Having Jurisdiction) for the area, and they can confirm the accuracy of what has been stated. Note that any type of fire protection is always a deferral permit which means the County does not approve the fire systems permit, the Fire Department does.

Lighting Pollution

For a project of this magnitude, minimum codes and standards must be met for safety and visibility. Light emanating from the buildings and casitas will radiate to the homes down the hill from the facility. Even with shades drawn, light will still be an issue. In addition, the proposed 89.13

parking spaces will directly deliver headlights into a majority of residents' bedrooms which typically face the hills.

Lighting at nighttime from inside the facility will also be intrusive for those properties in close proximity to the proposed project. Since this facility is a 24-hour operation, all public areas of the two suggested multi-level buildings will require lights to be on at any given time for the safety of the residents and staff.

Impact on Scenic View and Environment

The proposed project would be within the existing view shed of public areas, including from areas that offer views of scenic vistas and from viewpoints on designated and proposed scenic roadways (State Route 68, River Road and Reservation Road). The proposed project would also alter the existing, natural visual character of the project site. Although the LPRSP FEIR concluded that visual impacts on Highway 68 would be less than significant with full River View Draft EIR Page 2 buildout of the specific plan area, including the project site, potential visual impacts of the proposed project is considered a significant adverse environmental impact...." (p. 5-30)

89.14

Below are simulated images produced by a graphic designer (Highway 68 E or W view)

Below are simulated images produced by a graphic designer (River Road to Highway 68)

Commercial Kitchen

The proposed facility will have a commercial kitchen providing around 600 meals or more daily. Given that the residences of Las Palmas 1 are below the proposed facility, and coupled with the breezy conditions the area experiences, the smells from the facility's kitchen will easily travel to the homes. This will impact those homes which enjoy the fresh air by leaving windows and patio doors open. 89.15

Traffic and Public Safety

Another concern regarding this project is traffic and public safety. There is only one main entrance in and out of the community at Las Palmas Road. Las Palmas Road is narrow with blind corners, with very little room on the shoulders. Many residents and their children walk, run, play or bike on these roads at all times of day. River Road is already a very busy road due to traffic from other neighborhoods further down the road, Buena Vista Middle School, commercial vehicles and farming equipment. 89.16

Furthermore, the intersection of Highway 68 and Reservation Road has become a bottleneck after the addition of homes in East Garrison, Marina, and more is to come. It is important to note that the last complete traffic study for the area was conducted in the 1980s. The current traffic report prepared by Keith Higgins doesn't fully analyze the project or major arterials surrounding the community. Traffic volumes and trip generation ratio is always coming or going to Highway 68 which has been determined to currently operate at LOS F. The projected increase in trip generation from this project would exacerbate existing conditions.

The application proposed a mitigation measure as a staggered schedule to avoid peak morning and afternoon hours. However, the proposed schedule and shifts for the project and 92 employees should not be taken in full consideration since it cannot be enforced one way or another.

The increased traffic with the proposed facility will be a danger for the residents and a concern for public safety. It is already difficult to keep the cars moving through the front gate during peak hours. With a projected increase of 400 trips a day due to the facility, further traffic congestion at the entrance of our community will occur. This entrance has historically seen serious and deadly accidents. Furthermore, in the event of an emergency or a natural disaster, evacuating both residents of Las Palmas 1 and the residents of the facility would be chaotic and quite an undertaking due to the inherent traffic congestion in conjunction with emergency vehicles that will be trying to get in and out of the area.

Project Applicant Statement

According to the project description and the applicant's statement, the applicant agrees and states that the facility is not for residential use and is asking the County to amend its Specific Plan. If the County amends its plan for Parcel Q, the County will be setting precedent for future projects within the County. This constitutes spot zoning.

89.17

In closing, we simply believe that the use of the land should remain as was originally intended and zoned for by the county. We also believe that the County should have the 329 homeowners' best interest in mind, and that safety and the current County codes should be a priority with no variation or compromises. The short-term and long-term negative, significant, and unavoidable environment impacts that this project will have on this neighborhood and nearby areas do not justify any short term financial gains for the County.

We do not believe that development as a means for profit should negatively impact the quality of life for 1000 people directly and thousands more indirectly. This project, if approved, will inevitably reduce the value of the properties located in Las Palmas 1, which in turn will lower the amount of property taxes that the county will receive. We believe that the Draft Subsequent EIR

is inadequate under CEQA and contains too many holes and unanswered important and vital questions.

The site is not good for the proposed project because it is too far away from services (medical, financial services, food, shopping, transit) and infrastructure. Moreover, the parcel is not zoned appropriately. As proposed, the project will cause significant unavoidable negative environmental impacts.

Therefore, we believe that this project should be built in another location that will not significantly impact the environment and adversely impact the Las Palmas 1community.

Please confirm receipt of this letter.

Respectfully submitted,

X_____ X_____

Otavio Bernardo Leila Bernardo

Letter 89

COMMENTER: Otavio and Leila Bernardo

DATE: April 21, 2018

Response 89.1

The commenter states that it is important to care for elderly people, but that the project site is not a good fit for the proposed senior assisted living facility, due to the project's size and location.

Please refer to Topical Response C and Response 8.11. The project would be consistent with the site's zoning and land use requirements, and the project site is appropriate for an assisted living facility, given market factors.

Response 89.2

The commenter states that the project would impact quality of life for the existing Subdivision residents, by adding light, noise, and odors.

Please refer to Topical Response C. As described therein, quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Odor is discussed in Section 6.0, *Air Quality,* of the Draft SEIR, and again in Topical Response C. Odors released outdoors from meal preparation would be intermittent and unlikely to be objectionable to the extent of causing a public nuisance

Response 89.3

The commenter states that approval of the project would encourage litigation against the County, because the project violates County land use regulations and CEQA.

The commenter's opinion that the project violates regulations is noted. For a discussion of land use regulations, please refer to Topical Response C. Also, the comment regarding potential litigation is noted, and herewith shared with County decision makers for their consideration.

Response 89.4

The commenter lists land use policies from the County General Plan.

This comment consists only of excerpts from the County General Plan and does not include any commentary on the Draft SEIR. Therefore, specific response is not possible. Refer to Topical Response C for a discussion of the project's consistency with applicable land use plans and policies.

Response 89.5

The commenter states that the project would house 142 residents, which would result in a significant and unavoidable impact on public services including water, traffic, and emergency services.

As noted in Topical Responses A and B, Section 11.9, *Public Services,* of the Draft SEIR, has been revised to clarify that the project would have a less than significant on fire and police protection services. Implementation of the project would not require new or expanded public facilities to continue providing the existing level of fire and police protection and emergency services experienced by residents in the vicinity of the project site.

Please refer to Responses 4.5 for a discussion about water supply to the project. As noted therein and in the Draft SEIR, there is sufficient water to serve the project and impacts to water supply would be less than significant.

Response 89.6

The commenter states that the project would add 142 residents to the Subdivision community, substantially increasing the population without considering traffic, police, fire, disaster preparation, and infrastructure. The commenter states that the project would increase the Subdivision's population by 25-30 percent.

The commenter includes employees, vendors, and visitors in the population estimate of a 25-30 percent increase. Employees, vendors, and visitors would not live in the Subdivision or on the project site, and therefore would not add to the population. Regarding concerns raised in the comment, please refer to Topical Response A, Topical Response B, and Topical Response D. Impacts related to wildfire and fire protection would be less than significant. The project would not result in a significant impact on emergency preparedness within the Subdivision, and would maintain adequate emergency access routes to the project site.

Response 89.7

The commenter states that the project would result in impacts on groundwater basin demand and water quality. The commenter states that the project would increase water demand in the Subdivision by more than 10 percent, and therefore a Water Supply Assessment is required by the Public Utilities Commission. The commenter states that a hydrogeologic report is needed to determine the long-term water supply for the project. The commenter states that the project would result in a significant and unavoidable impact due to overdraft of the basin and seawater intrusion.

The commenter refers to Senate Bill 610 (SB 610), which requires a WSA for development projects that represent a ten percent increase in service connections for a water utility. "Service connection" refers to the piping that connects a building to a water distribution line. Therefore, the number of connections added by the project would be far less than the number of individuals that would reside there. Regarding the Senate Bill 610 provision that the commenter references, the number of new connections would be compared to the existing number of connections that the public water system is currently serving. The system serving the project site is the Salinas Hills service area of the California Water Service Company Salinas District. The Salinas Hills service area serves 1,639 connections, according to the 2015 Salinas District Urban Water Management Plan. Therefore, the project does not trigger a WSA based on an increase in service connections or any other parameters under SB 610.

Although the Salinas District is currently in overdraft, actions taken by both California Water Service and MCWRA, including conservation, system improvements, and future projects are projected to continue to provide for a reliable water supply. In its Urban Water Management Plan California Water Service projected its groundwater supply for the Salinas District will fully meet future demands through 2040. The proposed project would be new, and be designed, constructed, and operated with water conservation in consideration at the outset. The project would utilize the most current water efficient fixtures available, use minimal water for landscaping, and practice conservation in every day operation. Refer also to Response 3.3.

Response 89.8

The commenter states that the project would add traffic to SR 68, which would delay the response time of fire crews. The commenter requests details about the preparedness of the MCRFD Toro Station. The commenter states that the project would add residents to the area, which would adversely impact medical services for the existing population and would impact fire protection. The commenter states that due to impacts on fire protection and medical service, the Draft SEIR is deficient.

Please refer to Topical Response B. As noted therein, Section 11.9, *Public Services,* of the Draft SEIR, has been revised to clarify that the project would have a less than significant impact on fire protection services. The Toro Station's anticipated response time to the project site would meet the County' General Plan standard for fire response, and the project would not require construction of new or expanded fire service facilities or equipment. Increased traffic would not influence these response times, as the increase in vehicle trips on SR 68 would be minimal.

Section 11.9, *Public Services,* of the Draft SEIR, has been revised to include information about the capacity of and primary contingency plan at the Salinas Valley Memorial Hospital, which is the nearest public hospital to the project site. It is reasonable to assume that the Salinas Valley Memorial Hospital may receive project residents needing emergency care due to its proximity to the project site. However, the commenter is speculative in assuming the Memorial Hospital would be the sole medical care facility used by project residents and employees. The project itself would provide on-site day-to-day medical assistance for residents as noted in Section 4.0, *Project Description,* of the Draft SEIR.

Response 89.9

The commenter states that the Monterey County Sheriff's Office would need to increase its staff in order to serve the population increase that would be generated by the project.

Please refer to Topical Response A and Topical Response B. As noted therein, Section 11.9, *Public Services,* of the Draft SEIR, has been revised to clarify that the project would have a less than significant impact on police protection services. Implementation of the project would not require new or expanded public facilities to continue providing the existing level of public services experienced by residents in the vicinity of the project site.

Response 89.10

The commenter states that the proposed buildings would most likely be classified as Type R-2.1 per the California Building and Fire Code. The commenter describes the fire alarm requirements for buildings within this classification. The commenter describes the potential for smoke detectors to be activated, triggering a response from the fire department.

This comment does not conflict with the findings or analysis of the Draft SEIR. MCRFD reviewed the proposed building and site plans, and the project would be required to comply with applicable building and fire codes.

Response 89.11

The commenter describes the door alarms that could be included in the project design. The commenter states that the door alarms could result in noise impacts in the Subdivision.

For a discussion of the project's potential operational noise impacts, refer to Topical Response H. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 89.12

The commenter describes noise that could be produced by an emergency electricity generator at the project site, which could result in noise impacts in the Subdivision. The commenter summarizes concerns about noise, stating that the project-generated noise would impact the daily lives of Subdivision residents.

For a discussion of the project's potential operational noise impacts, refer to Topical Response H. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 89.13

The commenter states that the project's lighting would impact Subdivision residents.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

Response 89.14

The commenter states that the project would be visible from scenic roadways and would alter the visual character of the project site. The commenter provides graphic design simulations of structures replacing trees from various viewpoints approaching the project site.

The graphic design images shared by commenter depict a complete removal of all trees around the project site, which is not an accurate representation of the project plans. Please refer to Topical Response F for a discussion of scenic views and visual character. As stated therein, impacts to scenic resources and private views would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Response 89.15

The commenter states that meal preparation for the residents of the proposed senior assisted living facility would result in odor impacts in the Subdivision.

Odor is discussed in Section 6.0, *Air Quality,* of the Draft SEIR, and again in Topical Response C. Odors released outdoors from meal preparation would be intermittent and unlikely to be objectionable to the extent of causing a public nuisance.

Response 89.16

The commenter describes traffic conditions in and around the Subdivision. The commenter states that the traffic report prepared for the project doesn't fully analyze the project or the arterial roads in the area. The commenter states that the project would increase traffic and result in traffic safety concerns.

Regarding traffic impacts, refer to Topical Response D. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable. The traffic analysis included additional study of internal streets. Additionally, the project would not result in a significant impact related to traffic safety.

Response 89.17

The commenter states that approving an amendment to the LPRSP to allow for project approval would constitute "spot zoning." The commenter states that the project should be denied due to land use incompatibility, environmental impacts, and impacts to the Subdivision residents.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Anita Cochetti
21084 Country Park Road
Salinas, Ca 93908

Letter 90

April 22, 2018

Joseph Sidor
Associate Planner Monterey County RMA-Planning
Second Floor
1441 Schilling Place,
Salinas, CA 93901

Hello Joe,

I am writing to inform you that I am against the proposed project in Las Palmas 1. I chose to live in Las Palmas 1 for many reasons. First, I enjoy living in a quiet, peaceful neighborhood. The proposed project would increase noise levels because much more traffic will come through, and the building/construction noise would probably be going on for many, many months, maybe even years. My home backs right up to the proposed site, which I'm sure will be subject to much noise pollution. Another reason I chose to live in LP1 is for the beauty and nature of the entire neighborhood. I cannot imagine looking up the beautiful hillside, seeing nothing but buildings. The added pollution and traffic also cannot be good for our environment both aesthetically and for our health. Most importantly, I chose to live in LP1 because of the safety. The extra traffic, noise, pollution and continuous strangers driving in and out of our neighborhood would not offer the same safety I feel currently. I am also concerned about the damage the extra vehicles will cause on our roads. LP1 pays dues that cover our roads. I would not like for our dues to increase due to the extra wear and tear the new development will cause. I hope with much consideration for our beautiful community that this project will be moved elsewhere.

90.1

Thank you,

Anita Cochetti

Letter 90

COMMENTER: Anita Cochetti

DATE: April 22, 2018

Response 90.1

The commenter states that they are opposed to the project, and lists noise, traffic, hillside aesthetics, safety, traffic, pollution, and damage to roads as concerns.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Regarding aesthetic impacts, please refer to Response 30.2 above and Topical Response F. As stated therein, impacts to scenic resources and hillsides would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

As noted in Topical Response D, a standard grading and building permit condition, the County would require that the project applicant be responsible for repairing any damage to existing infrastructure during the temporary construction activities. Adherence to this condition of approval would prevent long-term deterioration of the circulation system from construction activity.

From: Kathy Della-Rose Date: April 22, 2018

Address: 21080 Country Park Road.

Salinas, CA 93908

Letter 91

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, (831) 755-5334 same physical address
swansonb@co.monterey.ca.us

Jacqueline Onciano, Chief of Planning, (831) 755-5193, same physical address

oncianoj@co.monterey. ca.us

Carl Holm, Planning Director, (831) 755-4879, same physical address
holmcp@co.monterey.ca.us

roygobets@aol.com , Roy Gobets (831) 235-1701 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Joe,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. 91.1

This development plan seems to conflict with the B-8 zoning of no development on the ridgelines. More disturbing is the excavation of the Eucalyptus Trees which provide a nesting ground for our beautiful owls. 91.2 91.3

Is there a buyer in place with strong credentials and viablility to execute running this type of operation ? This is not just a retail development open to many options—This is a very specific plan for a specified number of skilled employees to support the varied residents living in this residence. Also the traffic of 90 + employees coming in and out of our protected community leaves me feeling vulnerable as to the security of my home. 91.4 91.5

When I bought back in 2005, I felt there was intrinsic value in my home because it backed up to a barren hillside. With this development, I would have a huge commercial structure overlooking my backyard. Bummer!! 91.4

Kind regards,

Kathy Della-Rose

I respectfully urge the developer to find alternate venue and access for his proposed facility.

Please respond to the issues I listed above in writing.

Respectfully,

X_Kathy Della-Rose

_____

Letter 91

COMMENTER: Kathy Della-Rose

DATE: April 22, 2018

Response 91.1

The commenter states that the project would cause traffic problems, safety and security problems, and is inconsistent with the surrounding residential area.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks. In addition, the project would not result in a significant impact on police protection within the Subdivision.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 91.2

The commenter states that the project would conflict with the "B-8 zoning of no development on the ridgelines."

The comment does not provide sufficient information to respond to, as the referenced regulation is not specified. However, for a discussion of ridgeline development regulations, please refer to Topical Response F. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting. Further, while the project site is naturally elevated, nearby hills of substantially greater elevations would shield the site, with views of the site only momentarily visible to moving vehicles. As described in Topical Response C, the project would be consistent with the site's zoning and land use requirements.

Response 91.3

The commenter states that the project would remove eucalyptus trees that provide habitat for owls.

Tree removal and impacts to wildlife are discussed in Topical Response G and Section 7.0, *Biological Resources,* of the Draft SEIR. As noted in Topical Response G, impacts to common wildlife species would not be considered significant under CEQA and potential impacts to special status wildlife is mitigated through implementation of the Draft SEIR mitigation measures requiring preconstruction surveys and avoidance.

Response 91.4

The commenter asks if there is a "buyer in place" to purchase and operate the proposed senior living center.

Ownership and sale of the project site does not pertain to an environmental impact and is outside of the scope of the Draft SEIR. The Draft SEIR provides analysis of the environmental impacts of the

proposed project. The proposed project is that which is described in Section 4.0, *Project Description*, of the Draft SEIR. The Draft SEIR is applicable to the proposed project regardless of ownership.

Response 91.5

The commenter states that the traffic caused by employees of the proposed senior living center represents a threat to the security of Subdivision homeowners.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

From: Jennifer Lorentz
To: Sidor, Joe (Joseph) x5262
Subject: Proposed Development of Riverview
Date: Monday, April 23, 2018 3:01:02 PM

Letter 92

April 22, 2018

Mr. Joseph Sidor, Associate Planner
Mr. Brandon Swanson, Planning Manager
Monterey County Planning Commission

Mr. Sidor and Mr. Swanson,

As a resident of Monterey County, I am very concerned about the Proposed Development of Riverview at Las Palmas (LVLP) (PLN#150372). 92.1

Traffic:

A compete traffic study of the area (Highway 68, Reservation Road and River Road) has not been conducted for over twenty years. The traffic report, prepared by Mr. Higgins, does not fully consider the project and the arterial roads surrounding Las Palmas I. 92.2

Traffic on Highway 68 is already saturated and has been designated at a LOS F. Traffic will only get worse when the approved, but not yet constructed, Ferrini Ranch Project is completed.

Traffic on Reservation Road has increased since the development of East Garrison in Marina and construction is still continuing. Traffic already backs up on Reservation Road at the intersection with Highway 68.

RVLP resident, their guests, employees and vendors would utilize Las Palmas Road, the only public entrance/exit to the Las Palmas I community. Presently, incoming traffic backs up onto River Road. This situation will be exacerbated with the number of staff and commercial vehicles required to service RVLP. It is not unlikely that traffic would back up to the Highway 68 intersection. Traffic departing Las Palmas I would back up unto Las Palmas Road and Woodridge Road. This would create a dangerous situation for in the case of an emergency evacuation.

Scenic Views:

The proposed project would be within the existing view shed of public areas, including from viewpoints on designated and proposed scenic roadways I (Highway 68, River Road and Reservation Road). It would also alter the existing, rural visual nature of Las Palmas I. 92.3

I respectfully urge that the project be disapproved and the developer find an alternate venue for the proposed facility.

Jennifer Lorentz

3285 Cove Way, Marina, CA 93933

--
Jennifer Lorentz
Administrative Assistant

Cynthia E. Davis, CPA, Inc.
P.O. Box 2748
Monterey, CA 93942

Phone 831.649.1665
Fax 831.649.1667

Letter 92

COMMENTER: Jennifer Lorentz

DATE: April 22, 2018

Response 92.1

The commenter states that they are concerned about the proposed project.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 92.2

The commenter states that SR 68 is congested and operates at LOS F and is worsening due to recent and current projects. The commenter states that the project would exacerbate congestion at the Subdivision entrance and would make emergency evacuation more dangerous.

The Draft SEIR acknowledges that vehicle trips generated by the project would contribute to existing LOS F conditions on the segment of State Route 68 from Toro Park to State Route 218. As shown in Figure 9-2 in Draft SEIR Section 9.0, *Transportation & Traffic*, it is estimated that the project would add less than five peak-hour trips to this segment of State Route 68. Although this contribution to traffic on State Route 68 would be minimal relative to existing traffic conditions, the Draft SEIR notes that Caltrans considers a single additional peak-hour trip on highways with existing LOS F conditions to be a significant impact. Based on this conservative threshold, the Draft SEIR finds that the project would have a significant impact on traffic conditions on State Route 68. The applicant would be required to pay a regional traffic impact fee toward future improvements to State Route 68. However, because the applicant would not directly implement any improvements to this highway to offset the project's contribution to LOS F conditions, and it is unknown if future improvements using regional traffic impact fees would improve the level of service, this impact would be significant and unavoidable.

Please refer to Topical Response D for a discussion of queuing concerns at the Subdivision's entry gate. As noted therein, the project would increase inbound traffic at the gate by an estimated 16 percent. However, this increase in traffic would not substantially increase queuing. An additional westbound entrance lane at the gate would not be needed, and queuing vehicles would not obstruct vehicles from turning left onto Winding Creek Road. Therefore, the project would have a less than significant impact on traffic circulation related to queuing.

Please refer to Topical Response D for a discussion of impacts on emergency evacuation and emergency access. The project would not result in a significant impact on emergency preparedness within the Subdivision and would maintain adequate emergency access routes to the project site.

Response 92.3

The commenter states that the project would impact the area's aesthetics, including views from designated scenic roadways. The commenter urges that the project be disapproved and that the applicant find an alternate location for the project.

Please refer to Topical Response F regarding views from scenic highways. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Letter 93

From: Kathleen Vosti

Date: April 22, 2018

Address: 175128 Sugarmill Rd, Salinas, California 93908

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, swansonb@co.monterey.ca.us

roygobets@aol.com , Roy Gobets 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Joe,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. 93.1

I strongly urge the developer to find alternate venue and access for his proposed facility.

Please respond to the issues I listed above in writing.

Respectfully,

x Kathleen Vosti

RECEIVED
APR 24 2018
MONTEREY COUNTY
PLANNING DEPARTMENT

Letter 93

COMMENTER: Kathleen Vosti

DATE: April 22, 2018

Response 93.1

The commenter states that they are concerned about the project, citing traffic, safety, security, and incompatible land use as specific concerns. The commenter urges that the applicant find alternate location and access for the project.

Traffic is discussed in Topical Response D. Please refer to Topical Response A for a discussion of the project's impacts on security operations, and Topical Response D for a discussion of impacts on emergency evacuation. The project would not result in a significant impact on police service or emergency preparedness within the Subdivision. Regarding the Subdivision's private security operations, an agreement would be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

Secondary access between River Road and the project site during emergency evacuations would be available through the lawn area between County Park Road and Woodridge Court. However, secondary access would not be provided on Woodridge Court between Country Park Road and the first internal parking lot aisle. Mitigation Measure T-2 would be required to install improvements that improve access to the lawn area and Woodridge Court. With implementation of this measure, the project would have a less than significant impact on emergency access. Refer to Topical Response D for additional information.

April 23, 2018

Letter 94

Anthony & Jocelyn Driskill
17763 Riverbend Road
Salinas, CA 93908

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901

Cc. Brandon Swanson, Planning Manager;
Jacqueline Onciano, Chief of Planning;
Carl Holm, Planning Director;
Roy Gobets, Las Palmas Ranch Homeowner

Subject: RVLP Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr. Sidor,

The Las Palmas Ranch development has long been a part of my family's history. My father and mother, Alden and Janet Barstad, were members of the original Las Palmas Ranch Partnership (and they still are, as a matter of fact.). My father was the Planner for the project from its inception and throughout the procedure, ultimately bringing it to approval by the County for development. His vision was all about families living and thriving in the beautiful Countryside setting, which is Las Palmas Ranch. My dad had grown up in the Salinas Valley. He loved working in and serving the community which he accomplished in his career as an architect and school board member. He passed away in 2012.

My husband,Tony, and I moved to Las Palmas in 2008. Then in 2014 my Mom joined us, purchasing her home on River Run Road. Dad would certainly approve as this is a place where families feel safe and secure. We are enjoying the fruit of his vision. However, the prospect of a project the scope of Riverview at Las Palmas (RVLP) has cast a different light on " safety and security ". 94.1

1. To begin, the Las Palmas One entrance has a stop light. However, with the volume of traffic River Road carries there have been accidents not only at the Light but behind our house as well (closer to the gate at River View). Vehicles are known to hit speeds 65 mph and beyond, and not wanting to slow down <u>often</u> speed through a Yellow/even Red light. There have been fatal accidents on this portion of River Road in the past few years. Adding more than 300 vehicle trips per day (the developer's conservative estimate) through the Las Palmas I stop light, into and through our quiet community defies common sense. 94.2

2. A Project such as RVLP would add a significantly negative impact at the Highway 68 off ramps to River Road and Reservation Road! Presently, during commute hours, **traffic backs up along the right hand lanes of Highway 68.** This is already a very dangerous situation. Similarly, when the Spreckles District Schools begin their day and later in the afternoon when School is out, traffic is actually stopped in those right hand lanes of Hwy 68 approaching those exits. Now, add the 300+ vehicle trips projected for RVLP. **Please don't!** 94.3

3. Once inside the Las Palmas entrance, the 300 + vehicle trips will prove a huge disruption to our way of life. Many of these vehicles will be commercial: deliveries of food and supplies for 145 residents. Medical equipment deliveries, Garbage Trucks, Landscape Maintenance, other maintenance vehicles, Visitors, and Emergency vehicles of all types driving up and down the steep grade which is the access to Parcel "Q"; sirens, engine noise, and at night, headlights. All of it is unacceptable. Ours is a quiet, safe, family residential community. RVLP is a very large commercial project. 94.4

The green space in front of the historic Corey House was purchased in 1995 by Las Palmas I homeowners for the explicit purpose of ensuring our community of families exclusive use of that grassy park. And, it is indeed utilized daily by our residents. 94.5

It is our hope and request that this project NOT be granted approval, for the reasons cited above, as well as the many major issues articulated by other concerned Las Palmas residents. The RVLP Project would only exacerbate the severe traffic congestion that already exists on highway 68, Reservation Road, River Road and the entrance to Las Palmas I. We respectfully request that the application for Riverview at Las Palmas PLN#150372 be denied and the land reserved for single family residential only. 94.6

Sincerely,

Anthony Driskill

Jocelyn Driskill

Letter 94

COMMENTER: Anthony and Jocelyn Driskill

DATE: April 23, 2018

Response 94.1

The commenter provides background information related to the project. The commenter expresses concern about the project's safety and security impacts.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision.

Response 94.2

The commenter states that the Subdivision entrance experiences high traffic volume and traffic safety hazards. The commenter states the opinion that it would not be sensible to allow the project because it would add to the existing congestion into and through the Subdivision.

For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision or substantial increase in queues at the Subdivision entrance.

Response 94.3

The commenter states that the exit ramp from SR 68 onto River Road experiences congestion that dangerously backs up the right lane of SR 68. The commenter expresses concern about adding to this congestion.

Please refer to Topical Response D regarding potential impacts to SR 68 and Reservation Road. As stated therein, the project would result in LOS C traffic conditions at the intersections of SR 68 ramps with Reservation Road, which would be acceptable.

Response 94.4

The commenter states that project-generated traffic would disrupt the way of life for Subdivision residents.

Please refer to Topical Response C. As described therein, quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

Response 94.5

The commenter states that the green space in front of Corey House is utilized by Subdivision residents.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration. Further, impacts to public recreation facilities were addressed in Section 11.10, *Recreation*, of the Draft SEIR.

Response 94.6

The commenter summarizes their opposition to the project and reiterates concerns about traffic congestion. The commenter requests that the project be denied and that the project site be developed instead with a single-family residence.

The commenter's opposition to the project and preference for a single-family residence is noted and herewith shared with the County's decision makers for their consideration.

Letter 95

From: Melissa Fanning
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Holm, Carl P. x5103; Onciano, Jacqueline x5193
Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)
Date: Monday, April 23, 2018 1:31:48 PM

To Whom it May Concern:

I am resident of Las Palmas I, and are strongly opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372). This large non-residential development in Las Palmas 1 will pose traffic, noise, fire, safety and security problems in our serene neighborhood. 95.1

The scale and scope proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place.

I respectfully urge the developer to find alternate venue and access for his proposed facility. 95.2

This is one of the few communities left in Salinas that adults and children are able to walk, hike and utilize parks and open spaces and feel safe. This facility will take that from us. This area should not be permitted for commercial use. The homeowners should not be expected to have a commercial facility in our backyard. We bought in this community so we did not have to deal with traffic, crime, noise, etc. 95.3

This commercial facility will also cause displacement of various wildlife. 95.4

Single family homes would not create all the issues I have listed above. The area needs to remain as it was intended. 95.5

Please respond to the issues I listed above in writing.

Respectfully,
Melissa Fanning
21101 Country Park Road
Salinas, CA 93908

Letter 95

COMMENTER: Melissa Fanning

DATE: April 23, 2018

Response 95.1

The commenter states that they are opposed to the project and lists traffic, noise, fire, safety, and security as concerns.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

For a discussion of wildfire impacts, please refer to Topical Response B, which includes analysis added to the Final SEIR addressing wildfire hazards. Impacts related to wildfire and fire protection would be less than significant.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 95.2

The commenter urges the applicant to find an alternate location and access for the project.

The commenter's preference is noted and herewith shared with County decision makers for their consideration. However, as stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classifications, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

Response 95.3

The commenter states that the project would impact safety and quality of life for Subdivision residents.

Please refer to Topical Response C. As described therein, quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

Response 95.4

The commenter states that the project would displace wildlife.

Please refer to Topical Response G. As described therein, the project's impacts related to wildlife would be limited due to the size and placement of the project site. To reduce potential impacts to special status wildlife species, the Final SEIR includes mitigation measures, as listed in Section 4, *Amendments to the Draft SEIR*.

Response 95.5

The commenter states that developing the project site with single family homes would be less problematic than the proposed project.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Martin R. Johnson & Robin M. Mathews-Johnson, 21127 Old Ranch Court, Salinas, CA 93908 (831) 455-0622

4/23/2018

Letter 96

RECEIVED
APR 25 2018
MONTEREY COUNTY
PLANNING DEPARTMENT

Joseph Sidor, Associate Planner
Monterey County Resource Management Agency – Planning
1441 Schilling Place, 2nd Floor
Salinas, CA 93901

RE: RVPL DRAFT SEIR FOR PROPOSED DEVELOPMEMT OF RIVERVIEW AT LAS PALMAS (PLN#150372)

Dear Mr. Sidor:

We are original owners of a home in Las Palmas I, having lived in the Las Palmas Ranch Community continuously since our property was built in 1989.

Due to the negative and adverse impact on our neighborhood, we submit our strongest objections to the RVPL Draft SEIR and proposed development of Riverview at Las Palmas, as outlined below. 96.1

Please let us know if we can be of further assistance to you in this important matter.

Very truly yours,

Martin Johnson
Las Palmas I Homeowner

Robin Mathews-Johnson
Las Palmas I Homeowner

CC: Brandon Swanson, Planning Manager
Jacqueline Onciano, Chief of Planning
Carl Holm, Planning Director
Roy Gobets, Resident Las Palmas I

CEQA ENVIRONMENTAL IMPACTS INACCURATELY MINIMIZED AND MITIGATION NONEXISTANT

The Las Palmas I neighborhood is quiet, safe and aesthetically beautiful, by design. The streets are for the most part relatively narrow, and include full-width speed bumps throughout the property. The posted speed limit is 15 miles per hour on all our streets, and in many instances residents drive slower than the speed limit, in order to accommodate children playing, bicycle riders, roller bladers, baby strollers, and elderly seniors including people walking with canes and walkers, as well as walkers and runners with their pets. 96.2

In our own case, since our children have grown up, we normally walk our dogs on the streets of our community not once but twice daily, in all weather, on a year round basis. In fact, our independent-minded cat (off leash,) often follows us as we walk in the evenings, making our progress slow, but enjoyable. We and our animals are safe because traffic is quite limited, and drivers into our gated community must have a reason to be here. There is no through traffic or visitors allowed to drive on our streets without an actual reason or invitation to be here.

Only a small portion of the streets in our neighborhood have sidewalks, and street parking is quite limited, again, to allow the families who live here (and their guests,) to peacefully share our common areas, and enjoy our private homes.

The mere presence of the vehicles necessary to transport residents and staff to and from the proposed Las Palmas Assisted Living Senior Facility on a 24/7 basis when it is open year round, every day of the year, will make our (and our neighbors) current regular use of the Las Palmas I streets impossible. Furthermore, anticipated emergency vehicles plus daily vendors, independent contractors and visitors, will add to this usage of our streets and entrance area, significantly increasing traffic volume, again, 24/7.

Clearly, the CEQA environmental impacts including but not limited to aesthetics, Las Palmas I resources including roads, security staffing, curbs, policing by the Monterey County Sheriff's Dept., along with air quality, geology/soils, greenhouse gas emissions, potential increase in hazards such as carbon dioxide and other pollutants, land use and planning, noise, population, water resources, transportation and traffic will all negatively affected in our community and our use of the neighborhood as outlined above, with no viable mitigation possible or provided. 96.3

These impacts to our community are significant and have an unavoidable impact that will cause a substantial and lasting change on the physical environment, and cannot be avoided if the project is implemented.

DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT INSUFFICIENT AND INCONSISTANT ON ITS FACE

The report is flawed at its core. The environmental and use impacts on Las Palmas I and the surrounding county roads, agricultural lands (where strawberries and other crops are grown almost year round with necessary trucks, farm equipment, agricultural workers and other employees work,) along with other nearby housing, as well as the Salinas River, have not been adequately and properly vetted. 96.4

In addition, potential and serious problems have been glossed over, and in some cases, contain point blank inconsistencies and errors.

For instance, the developer asserts that they pay homeowner dues for Parcel Q on a monthly basis. This implies that they are members of Las Palmas I, with resultant legal rights including the right to vote, etc. Their assertion is untrue. It has been confirmed by our property manager that they provide a $40 per month "road maintenance," to the homeowners, but are not billed for this amount. It is further confirmed that the developer does not pay monthly dues, and is not members of our association.

It is clear that not all available information has been considered by the developer in this draft SEIR, and for that reason it should not be adopted by the county.

EXISTING EASEMENT ON LAS PALMAS I INSUFFICIENT TO SUPPORT PROPOSAL; "AN EASEMENT DOESN'T MEAN THEY CAN BUILD A FREEWAY"

A legal right to traverse the streets of Las Palmas I does not include the right to violate the intended and actual use of the property. That's what this draft SEIR does. 96.5

The easement to Parcel Q is defined as:
"A non-excusive easement for ingress, egress, road and utilities over that portion of River Run Road and Woodridge Court being a portion of Common Area Parcel C and Las Palmas Road being Common Area Parcel A as shown and designated on that Map entitled Amended Map of Las Palmas Ranch Corey House Area / Unit 1 Tract 1086A filed June 15, 1989 in Volume 16 of Cities and Towns at Page 70 in the Office of the County Records of Monterey County, California. Said easement shall be appurtenant to Parcel Q as shown and designated on the above referred to Map of Tract 1086A."

This easement was filed with the county five months before we moved into our home on Old Ranch Court in 1989. It was never intended for travel other than residential use by individual homeowners and their needed service vehicles. Our local, private roads, are just that: local and private.

Furthermore, the original development was for several (not more than three) residential homes, to fill out the housing in Las Palmas I. In fact, my husband and I recall from our personal conversations with the developer Mike Fletcher, as well as his sales staff, that he had hoped one day to build his own home at the top of the hill on Parcel Q. He declared that the rest of the property was permanent open space, and never to be developed. We relied on these assertions to buy our home. 96.6

There was never any express or implied intention that our roads would be used for anything other than personal, residential use.

Contrary to this fact, the developer asserts that Las Palmas Road, River Run and Woodridge Court were dedicated as part of the Las Palmas Subdivision with no restrictions. This is clearly in conflict with what the developer and subsequent homeowners, including ourselves, understood or intended.

Or to put it another way, this easement doesn't mean they can build a freeway!

LAS PALMAS I IS A COMMON INTEREST DEVELOPMENT, AND THIS PROPOSAL VIOLATES THE PROPERTY AND OTHER LEGAL RIGHTS OF THE HOMEOWNERS AND OUR HOMEOWNER'S ASSOCIATION

Las Palmas I is not a "typical" Salinas community or neighborhood. Instead, we are the Las Palmas Ranch Master Association, a California mutual-benefit group, also commonly referred to in layman's terms as a "Planned Unit Development," or PUD. As such we have special rights and obligations under California law. 96.7

The special nature of our neighborhood has not been addressed or adequately considered in the draft SEIR. In particular, the Covenants, Conditions and Restrictions (CC&Rs) of Las Palmas I are violated by this proposal, by 1. Not addressing them, and 2. Failing to abide by them.

This is a clear violation of the law.

For instance, we understand that the California Civil Code, Section 5300, defines, inter alia, the property rights of association members of groups such as ours as, "an ownership interest in a community's common area," who can be held personally responsible for injuries and property damage arising from the use of the common area. This is just one of the many potential risks of developing Parcel Q as proposed.

Further, and more significantly, as required by Sections 5310(a)(10) and 4765 of the California Civil Code, and as outlined in Article VI of the Master Declaration of Covenants, Conditions and Restrictions for Las Palmas Ranch Planned Unit Development, certain physical changes to a 96.8

property require Association Approval, pertaining specifically to architectural control, committee approval and design criteria.

These standards have not been met by the developer in this case, and we believe the proposed development clearly represents a violation of both California law generally with regard to associations such as ours, and our own CC&Rs specifically.

THE DEVELOPER HAS NO STANDING TO WAIVE PROPERTY RIGHTS OF LAS PALMAS I RESIDENTS

This developer is not a homeowner, and nor are they members of our Las Palmas I Homeowner's Association. Previous polls and votes taken of our residents have indicated a clear majority stand against this development. This applicant has no legal standing to waive the various and extensive property rights of our community. 96.9

THE DRAFT SEIR REPRESENTS INTERFERENCE WITH THE POSSESSORY & OWNERSHIP INTERESTS OF EACH AND EVERY HOMEOWNER IN LAS PALMAS I

The developer will in essence be exercising dominion and control over our real and personal property, and thus interfering with our rights in the property. It is clear that if this project is approved, our property rights and obligations to one another as an association will be taken away without recompense. 96.10

IT'S JUST NOT RIGHT

Finally, it is our strongly held view that the River View at Las Palmas Assisted Living Senior Facility is just not right. Not right for Monterey County. Not right for other people and ranchers living and working on River Road. Not right for Las Palmas I residents and homeowners. Not right for us. And not right for the developer's intended senior population and projected staff, no matter how nicely he describes it. 96.11

Our Las Palmas I neighborhood is quiet, safe and aesthetically beautiful, by design. For these reasons, the draft SEIR and proposed project must be denied in its entirety as unfeasible, unsafe, and inappropriate use of the land.

Thank you for your consideration.

Letter 96

COMMENTER: Martin Johnson and Robin Matthews-Johnson

DATE: April 23, 2018

Response 96.1

The commenters state that they are opposed to the project.

The commenters' opposition is noted and herewith shared with the County's decision makers for their consideration.

Response 96.2

The commenter provides a description of the Subdivision. The commenter states that project-generated traffic would impact the way that Subdivision residents are able to walk on the streets.

For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 96.3

The commenter states that the project would have environmental impacts to the resource areas identified by CEQA. The commenter states that impacts to the Subdivision community would be significant and unavoidable due to changes to the physical environment.

Environmental impact analysis under CEQA generally pertains to the environment itself, rather than community members. Refer to each impact area of the Draft SEIR for the findings of significance that describe whether or not the project would result in significant impacts. The Draft SEIR identified two significant and unavoidable impacts: project-level traffic impacts to SR 68, and cumulative traffic impacts to SR 68. Refer to Section 9.0, *Transportation & Traffic*, of the Draft SEIR for an analysis of the project's traffic impacts and the mitigation measures designed to reduce traffic impacts.

Response 96.4

The commenter states the opinion that the Draft SEIR is flawed due to inconsistencies, errors, and insufficient analysis. The commenter states, as an example, that the Draft SEIR asserts that the applicant pays monthly LPHOA dues, inaccurately implying that they are members of the Subdivision community.

Page 4-17 of the Draft SEIR states that the project applicants are members of the LPHOA, have paid dues to the association, and would pay a proportionate share for the use of the roads and the drainage system. As noted in Topical Response I, page 4-6 of the Draft SEIR has been revised to clarify that an agreement would be required between the LPHOA and the project applicants, who own the project site, to clarify cost-sharing and responsibilities. This includes connection to stormwater drainage facilities, road maintenance , and cost-sharing for private security service.

Response 96.5

The commenter states that the easement for the project site only allows for residential use by individual homeowners, and that the roads are local and private.

Please refer to Topical Response I. As noted therein, a written agreement between the LPHOA and the applicant would be necessary in order to clarify cost-sharing and responsibilities associated with the streets that are under the control of the LPHOA. Such an agreement is not currently in place. It is outside of the scope of the Draft SEIR to facilitate an access agreement between the applicant and the LPHOA.

Response 96.6

The commenters state that the project site was intended to be developed with no more than three residences.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 96.7

The commenters state that the Draft SEIR does not account for the special rights and obligations that Subdivision residents have under state law as a Planned Unit Development. The commenters state that the members of the Subdivision homeowners association are responsible for injuries and property damage arising from use of the "common area," and that risk is not addressed in the Draft SEIR.

The comment is noted; however, property rights and property values are not considered environmental impacts under CEQA. Therefore, no further response is required. Regarding property damage, please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision.

Response 96.8

The commenters state that, pursuant to Sections 5310(a)(10) and 4765 of the California Civil Code, and as outlined in Article VI of the Master Declaration of Covenants, Conditions and Restrictions for Las Palmas Ranch Planned Unit Development, certain physical changes to a property require LPHOA Approval.

An agreement would be required between the applicant and the LPHOA regarding shared costs and responsibilities, as discussed in Topical Response I.

Response 96.9

The commenters state that the applicant is not a member of the LPHOA, and that the Subdivision residents oppose the project. The commenter states that the applicant has no legal standing to waive the property rights of the Subdivision homeowners.

Page 4-17 of the Draft SEIR states that the project applicants are members of the LPHOA, have paid dues to the association, and would pay a proportionate share for the use of the roads and the drainage system. As noted in Topical Response I, page 4-6 of the Draft SEIR has been revised to clarify that an agreement would be required between the LPHOA and the project applicants, who

own the project site, to clarify cost-sharing and responsibilities . This includes connection to stormwater drainage facilities, road maintenance, and cost-sharing for private security service.

The commenter's suggestion that Subdivision residents oppose the project is noted, and is herewith shared with County decision makers for their consideration.

Response 96.10

The commenters state that the project would involve the applicant "exercising dominion and control over our real and personal property." The commenters state that project approval would amount to taking away the rights of the LPHOA.

The commenter's opinions are noted and herewith shared with County decision makers for their consideration.

Response 96.11

The commenters state the opinion that the project is "not right" for the surrounding community.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Ron Provost & Linda Ipong
17523 Sugarmill Road
Salinas, CA 93908

April 23, 2018

Letter 97

Mr. Joseph Sidor, Associate Planner (via email: sidorj@co.monterey.ca.us)
Mr. Brandon Swanson, Planning Manager (via email: swansonb@co.monterey.ca.us)
Monterey County Resource Agency – Planning
1441 Schilling Place, Second Floor
Salinas, CA 93901

Re: Riverview at Las Palmas (PLN#150372) - Senior Facilities

Dear Mr. Sidor and Mr. Swanson;

We write this letter as residents of Las Palmas Ranch I. We have lived at Las Palmas Ranch for 28 years. We oppose the proposed development of Riverview at Las Palmas for several reasons some of which are stated below in response to the draft SEIR. 97.1

1. The Las Palmas Ranch Specific Plan

This large proposed non-residential development is inconsistent with the Las Palmas Ranch Specific Plan ("Specific Plan") and the peaceful rural residential nature of the Las Palmas community. The Las Palmas Ranch neighborhood is a quiet community designed according to and subject to the Specific Plan. As with all new subdivisions, a lot of hard work was done to create the Specific Plan. The Specific Plan provides a plan for open space and rural neighborhoods -- to allow for children playing, people walking dogs, residents enjoying the peacefulness of this rural neighborhood, and the natural surroundings of wildlife. The Specific Plan sought to cluster the residential units in specific locations with low visual impacts and retain the remainder of the Las Palmas Ranch planned area as open space, including the frontal slopes and ridgelines. The proposed development is a drastic change to the Specific plan. The proposed development is for commercial facilities similar to multi-residential facilities. Introducing a large senior residential care facility on this visually prominent site was never contemplated in the Specific Plan. 97.2

Under the Specific Plan, the maximum build out of Las Palmas Ranch planned community was 1031 homes. Today there are 1029 homes built for the area covered by the Specific plan. The Las Palmas Ranch has now been built out accordingly, and the Specific Plan should be followed without changes. In addition, the proposed changes to the Specific Plan would create a dangerous precedence for drastic changes to an already established neighborhood.

We request that the Specific Plan be enforced without any changes or amendments.

2. Traffic Impact

The Traffic impact resulting from the proposed development would be detrimental to the Las Palmas Ranch neighborhood. The SEIR confirms and acknowledges that the main corridor to the Las Palmas Ranch is Highway 68, which has been determined to be congested and operates at a level of LOS F, the lowest level. In addition, the SEIR states that the River Road sections for the Las Palmas subdivisions operate as a C and D level. The added traffic will further stress these levels. This roadway also provides access to large slow moving farming equipment as well as large agricultural vehicles. The added traffic will also cause additional risk for vehicle accidents. 97.3

The additional traffic for the proposed development includes the residents of the 26 individual units ("casitas") plus visitors, home care personnel, home service providers, such as landscapers, housekeepers, etc., as well as doctors, personal representatives, medical supply delivery. The facilities will need to be supplied with delivery

services of all types, emergency services, and ambulance calls. All of which will dramatically increase traffic and noise within the housing area surrounding the development.

The SEIR fails to provide a detailed analysis of the traffic impact within the streets of the Las Palmas Ranch subdivision. The entrance to the subdivision consists of a one lane entry. It is anticipated there will congestion of traffic into the subdivision, causing backups at the single entry to Las Palmas Ranch along River Road. This intersection has been the site of 20 collisions between 1998 and February 2017, with at least one fatality, and additional traffic generated by the proposed development will certainly increase the risk.

Further, the neighborhood streets on the Parkside section of Las Palmas Ranch serves as the entry way to the proposed development. The streets on Parkside are narrow and winding, with certain roads ending and closed off resulting in drivers to have to turn around on the narrow roadways and back track out. Drivers could easily get confused and wander through the neighborhood aimlessly, causing more congestion within the neighborhood.

The alternative methods stated under the SEIR, such as alternative peak time work hours or providing shuttle services are not sufficient. These simply add to the stressed traffic issues.

The SEIR states in section 15.1 that the traffic impact is significant and that it is unavoidable. However, it is avoidable by not approving the proposed development and the proposed changes to the Specific Plan.

For the above reasons, the proposed changes to the Specific Plan should be denied and the proposed development rejected.

3. Aesthetics

The River Road and Highway 68 corridors are deemed scenic roadways/corridors and visually sensitive areas. The added traffic congestion will impact the scenic roadways along the River Road section. The proposed multi-story facilities will be visible throughout the roadways and cities. The ridgeline will not be protected even with proposed vegetation due to the enormous size of the facilities. 97.4

The Las Palmas Ranch homeowners maintain the subdivision at great costs and effort. The roadways, parks and infrastructure are all maintained by the homeowners through their Homeowners association. The owner of Riverview property pays for a road maintenance fee for the portion of roadway from the entry of the subdivision to their property, but it is not a member of the HOA and does not pay to maintain the subdivision as stated in the SEIR.

For these reasons, the proposed changes to the Specific Plan should be denied and the proposed development rejected.

4. Light

There will be substantial and significant light and glare impacts to the adjacent subdivision as well as the surrounding public areas. The proposed development is large, consisting of tall and large 2-story and 3-story facilities, sitting on a prominent ridge above the Las Palmas neighborhood, River Road and Highway 68, designated scenic corridors. The light from the Project will be visible throughout the surrounding areas and the night sky will no longer be naturally dark. The facility will be well lit for its operations and the lights will remain on all night. This is a substantial change from the natural darkness of the site, as it exists. A lighting plan does not adequately address the significant impact. 97.5

5. Growth Inducing

The proposed development is clearly growth inducing beyond what was approved and anticipated in the Specific Plan. It is placing increased growth in an area inconsistent with the Specific Plan. The services and facilities needed for this type of proposed development is best suited to be within the city limits where certain medical and hospital facilities and other required services are located. For this reason, we request that the change to the Specific Plan be denied and the proposed development be rejected 97.6

6. Irreversible Impacts

The SEIR states that there are no irreversible impacts. Having lived here for many years, we have been aware that the developer of Las Palmas Ranch experienced a significant slide during construction work done next to the park located at the end of the canyon, in close proximity to the proposed development site. Our concern is the potential for additional slide damage to occur for a project of such magnitude as this proposed development. For this reason, we request that the change to the Specific Plan be denied and the proposed development be rejected. 97.7

7. Noise

It is anticipated that the noise level of the neighborhood will increase significantly due to the large size of the proposed development as well as the number of people that will be utilizing the development. The SEIR fails to provide an analysis of the impacts to the noise level. The increased noise level is further impacted by the statement in the SEIR that over 80 mature trees will be removed. For this reason, we request that the change to the Specific Plan be denied and the proposed development be rejected 97.8

CONCLUSION

The impacts of the proposed development will be significant and detrimental to the surrounding area and the subdivision below, in particular, due to the impacts of the increased traffic, light, noise, potential irreversible construction effects, and overall incompatibility of the surrounding area and the Specific Plan. We request that the proposed changes to the Specific Plan be denied and the proposed development be rejected.

Respectfully,

Ron Provost

Ron Provost

Linda Ipong

Linda Ipong

Letter 97

COMMENTER: Ron Provost and Linda Ipong

DATE: April 23, 2018

Response 97.1

The commenter states that they are opposed to the project.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration. The commenter's individual concerns are listed and responded to below in the subsequent numbered comments.

Response 97.2

The commenter states that the project is inconsistent with the LPRSP, which was intended to design the neighborhood with clustered residential units, limited visual impacts, and open space. The commenter states that the Plan Area is nearly built out, with 1,029 of a maximum 1,031 homes built.

Regarding consistency with the LPRSP, refer to Topical Response C. As noted therein, the project would be consistent with LPRSP policies and the residential unit cap for the LPRSP Plan Area is not applicable to the proposed project because the project is not residential.

Response 97.3

The commenter states that the area's roadways are already congested and are used by large agricultural vehicles, and thus adding more traffic would cause traffic safety hazards. The commenter states that the Draft SEIR does not analyze traffic impacts at the Subdivision entrance or within the Subdivision's roads.

Please refer to Topical Response D. As described therein, the project would not result in a significant impact related to traffic safety. Additionally, the project would increase inbound traffic at the gate by an estimated 16 percent. However, this increase in traffic would not substantially increase queuing at the Subdivision entrance. An additional westbound entrance lane at the gate would not be needed, and queuing vehicles would not obstruct vehicles from turning left onto Winding Creek Road. Therefore, the project would have a less than significant impact on traffic circulation related to the Subdivision entrance.

Response 97.4

The commenter states that the project would impact the views along the SR 68 and River Road, which are designated scenic roadways. The commenter states that the Draft SEIR incorrectly identifies the applicant as a member of the LPHOA that pays to maintain the Subdivision.

Please refer to Topical Response F regarding views from scenic highways. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Page 4-17 of the Draft SEIR states that the project applicants are members of the LPHOA, have paid dues to the association, and would pay a proportionate share for the use of the roads and the drainage system. As noted in Topical Response I, page 4-6 of the Draft SEIR has been revised to

clarify that an agreement would be required between the LPHOA and the project applicants, who own the project site, to clarify cost-sharing and responsibilities . This includes connection to stormwater drainage facilities, road maintenance, and cost-sharing for private security service.

Response 97.5

The commenter states that the project would result in light and glare impacts to the Subdivision and the surrounding area.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is required to reduce lighting impacts to a less than significant level.

Response 97.6

The commenter states that the project would induce growth beyond the levels anticipated by the LPRSP. The commenter states the opinion that the proposed senior living center would more appropriately be built within the limits of a City.

Please refer to Topical Response C regarding growth inducement. As stated therein, while the proposed project would indirectly result in business and population growth due to the increased local investment from revenues generated by the project, projections of any potential growth would be speculative.

Refer to Response 8.11 for a discussion of the appropriateness of the project site for a senior assisted living facility.

Response 97.7

The commenter states the Draft SEIR lists no irreversible impacts. The commenter states that "slides" have occurred in the area, and that the project's construction activities may result in more damages from slides.

Irreversible impacts are discussed in Section 16.0, *Irreversible Impacts*, of the Draft SEIR.

The Draft SEIR discusses landslides in Section 11.4, *Geology & Soils*. As noted therein, a geologic hazards report and soil engineering feasibility investigation was prepared for the project (see Appendix F of the Draft SEIR), and impacts related to geology and soils were determined to be less than significant. The project's building envelope would be within a geologically suitable location to avoid environmental impacts related to landslides. For further discussion, refer to Topical Response E.

Response 97.8

The commenter states that the project would increase noise levels in the Subdivision, and that the Draft SEIR does not analyze noise impacts. The commenter states that tree removal would exacerbate noise impacts. The commenter provides additional summary of their previous comments.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Rachel Sullivan
21084 Country Park Road
Salinas, Ca 93908

Letter 98

April 23, 2018

Joseph Sidor
Associate Planner Monterey County RMA-Planning
Second Floor
1441 Schilling Place,
Salinas, CA 93901

Hello Joe,

I am writing to let you know that I am in opposition the proposed project in Las Palmas 1. Las Palmas 1 is a neighborhood that is very quiet, safe and offers a beautiful environment to live in. This is why I chose to live here. I am very concerned about the added traffic, pollution and noise level the new development would cause our neighborhood. Not to mention, the concern of so many service vehicles, ambulances and strangers driving in and out of LP1, daily. I also do not want all the beautiful trees to be cut down and be replaced with a bunch of buildings. My house backs right up to the proposed developments and I do not want my privacy to be taken away. It is with these concerns that I hope this project will be moved to another location. 98.1

Thank you,

Rachel Sullivan

Letter 98

COMMENTER: Rachel Sullivan

DATE: April 23, 2018

Response 98.1

The commenter states that they are opposed to the project. The commenter states that the project would add traffic, pollution, would remove trees, and would impact the privacy and the safe/quiet atmosphere of the Subdivision.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Please refer to Topical Response C. As described therein, quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

Letter 99

From: Stephanie Trost
To: Sidor, Joe (Joseph) x5262
Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)
Date: Monday, April 23, 2018 8:53:14 PM

Dear Mr. Sidor,

I am very concerned about the above proposed project. Its use of Las Palmas 1 public roads will create unacceptable traffic, safety, and security problems for our established neighborhood. Further, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they moved here in the first place. Please reference the original Las Palmas Specific Plan, and you will see the discrepency between the original plans for our community and this proposed calamity. 99.1

I respectfully urge the developer to find an alternate venue and alternate access for his facility. 99.2

Please respond to the issues listed above, in writing.

Respectfully,

Stephanie Trost
17768 Riverbend Rd
Salinas, CA 93908

Letter 99

COMMENTER: Stephanie Trost

DATE: April 23, 2018

Response 99.1

The commenter states that the project would result in impacts related to traffic, safety, and security. The commenter states that the project's large number of housing units is inconsistent with the residential atmosphere of the Subdivision, and is not consistent with the LPRSP.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 99.2

The commenter urges the applicant to find an alternate location and access for the project.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning classifications, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

Letter 100

From: Richard Yraceburu
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334
Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)
Date: Monday, April 23, 2018 1:10:23 PM

Hello Mr. Sidor,

I am an original home owner on Woodridge Court since it was built in 1990. The proposed Riverview project raises a lot of concerns for our beautiful Las Palmas 1 community. Our roads are narrow and we can not park on them due to emergency access, an increase in vehicle traffic will create, road damage, safety and security problems 24 hours a day. 100.1

The large number of units proposed is inconsistent with Flecher Construction's development plan and why we purchased homes in Las Palmas Ranch 1. There were "NOT" any commercial businesses within our development. I strongly urge the developer to find another site and access for his facility. There are a lot of sites zoned commercial in Monterey County. 100.2

Please respond to my issues I listed above in writing. Thank you.

Respectfully,
Richard Yraceburu,
Home owner

Sent from Mail for Windows 10

Letter 100

COMMENTER: Richard Yraceburu

DATE: April 23, 2018

Response 100.1

The commenter states that they are opposed to the project. The commenter states that project-generated traffic would damage the Subdivision's roads and cause safety and security problems.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision. Additionally, mitigation is required to reduce impacts to road surfaces to a less than significant level.

Please refer to Topical Response A for a discussion of security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision.

Response 100.2

The commenter states that the project is inconsistent with Flecher Construction's development plan.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Letter 101

From: Javier Aldape
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103; roygobets@aol.com
Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)
Date: Tuesday, April 24, 2018 7:24:50 AM

Gentlemen: I am resident of Las Palmas and strongly opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372). This community was chosen by the residents as a quiet, safe and relatively dark haven from the Salinas proper area. . However, this large non-residential development is inconsistent with the Las Palmas community core values. I. Traffic: • River Road Traffic: The stop light at LP1 entrance has seen 20 accidents over the last 10 years. One 4-year old child has already died by a texting drunk-driver. I personally observed one accident. Additional traffic for the “Parcel Q” will aggravate this situation. • Potential Accidents: Currently, the curve blocking the visual to the LP1 light going South, allows only 4-5 seconds (traveling at 55 mph) before reaching the intersection. This short distance is suspected as the cause of several accidents at this point. If the proposal goes through, any celebrations with family members over holidays and family events at “Parcel Q” will significantly increase the traffic load and potential for blood shed. • Security Stops: Traffic already backs up into the River Road exit lane at peak times due to our security check point. Adding 50-90 cars and construction vehicles a day will increase the potential for further traffic congestion and accidents. • Emergency Situations: God forbid, the potential for a conflagration erupting on the south end of the canyon would necessitate immediate evacuation of all members of the community. A NW wind driven fire could spread exponentially in these closely packed houses as seen in recent fires in northern and southern California. There are 2 exits to get out for over 300+ homes plus the emergency vehicles, potential staff and patients! • Construction Traffic: The traffic generated by the construction phase will be extremely problematic. This quiet valley is nestled between two large hill sides. Any construction traffic noise would be echoed off the hills. Construction and delivery equipment would need to climb a steer entrance road at low gear. Any subsequent grading equipment will emit a loud back up beeping noise that will be heard from all LP1 units. This constant and increased traffic would irrevocably alter the safe, peaceful nature of the community. • Commercial Traffic: The proposed development would bring increased emergency fire and ambulance calls as both are required to attend. These will bring unwanted noise and light pollution at all hours of day and night. Any commercial vehicles -- food deliveries, medical waste, trash, linen, etc., -- and potentially 90+ employee vehicles will funnel through a narrow street originally designed for residential traffic. II. Security • Security of the neighborhood would be compromised by this unwarranted, greedy assault on LP1 community. As this will open the neighborhood to non-residential traffic, we fear an increase in crime that has decreased since installation of LP1 security personnel. There is no way to regulate this increased traffic and guarantee the security of the neighborhood. This is a real concern. III. The Proposed Non-Residential Development is Inconsistent with the Existing Residential Community • Under The Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood. • This parcel is zoned "medium density residential," at 2.61 units per acre. Under the Las Palmas Plan this parcel was specifically approved for 8 units total. The developer now seeks a "conditional use permit" to allow development of a non-residential facility with a total of 105 units. This is inconsistent with The Las Palmas and Monterey County Plans. • The developer seeks to circumvent these plans by requesting an amendment for a non-residential use. Specifically, the developer asks you approve an amendment with the following language; “Assisted living facilities are not considered residential units (and should not be) subject to the residential limitation of the (Las Palmas) Plan.” An assisted living facility is not a residential use, because it does not operate or function in a manner like independent residential units. • Las Palmas is a highly desirable residential community with stable property values. Residents fear the loss of their investment potential from a rush to get out of LP1 due to the nature of this development. Several friends have moved out fearing this project. • To approve this amendment to the Las Palmas Plan and to allow development of a non-

residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community. IV Intrinsic Values: Development of this size will alter our environment. • The location in question has 80+ eucalyptus trees that will be removed under current plan. These provide reduction in wind, ridgeline exposure and Hwy 68/RR sound abatement. • Moreover, these 70+ year old eucalyptus trees are home to several generations of Red Tailed Hawks and Great Horned Owls. Last year we had an overabundance of Vols (large field mice) which were running around even in daylight. These essential predators were active in Vol reductions. Watching these great birds soar and perform aerial ballets over our hillsides is unmatched in Salinas proper. • Bobcats and deer live up on the hillsides and flats of the area in question. Last year one female bobcat brought her 3 cubs out into our common area multiple times. This was a delight of all who caught this rare event. One mother deer has birthed 5-6 pairs of babies over the last few years and we have watched them grow into adulthood. • Destabilization of the steep hillsides in question is a serious threat to mudslides. We have experienced similar abundant rain-slide events even without any development activity. • There is a sense of fear in LP1 that is unparalleled in my 15 years in the community. • Would you want this development to go forward next door to your home? • Light Pollution: We currently are able to view changing of the planets and star constellations due to our unpolluted dark areas. This will stop under the PLN#1500372. • Noise: A friend who worked to help develop a similar nursing home in Hollister indicated the potential of “Screamers” being heard in the night is real. She later regretted helping this proposal from just this perspective. • Smells: As this proposed facility will generate substantial numbers of meals, we will not enjoy sharing their menus due to prevailing winds. I request you please carefully evaluate these issues when considering this proposed development. This shell game should not be approved. Thank you for your consideration, Sincerely, Mr. and Dr. Aldape

Letter 101

COMMENTER: Javier Aldape

DATE: April 24, 2018

Response 101.1

The content of this letter is the same as the content of Letter 29. Please refer to Responses 29.1 through 29.11 above.

Received by RMA-Planning
on April 25, 2018.

Letter 102

To: Sidorj@co.monterey.ca.us

CC: swansonb@co.monterey.ca.us , roygobets@aol.com

SUBJECT: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Date: 4/24/18

TO: Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901

(831) 755-5262

FROM: Mark Miller
21176 Old Ranch Court
Salinas, CA 93908

H: 831-455-9855, C: 831-915-3446

Dear Mr. Sidor,

I am writing to express my concern about and my disapproval of the proposed Development of Riverview at Las Palmas (PLN#150372).

102.1

Our family has lived in this neighborhood for almost 11 years now. We bought a house here for a variety of reasons, but most importantly this area was everything we wanted as we strove to provide a family home for our children: a safe environment, streets surrounded by other homeowners who cared about their property and their neighbors, an area that was free of visual, noise, air, and traffic pollution – and simply put, a place we could invest in to live a quality of life that we had desired.

In the time we have lived in Las Palmas, I could not be happier. I've seen our neighbors come together and vote on important safety measures, like placing a guard and gate at the entrances to this neighborhood. We talk to many of our neighbors on a daily basis, as we are close to one of the several parks in our neighborhood and we see them on their daily walks on the streets and up to the park near our house. In a span of 6 houses on our street, there are 8 lovely little girls (2 of them mine) who are now best friends and play daily in our front yards, in the streets, and in the adjacent park. Our children run, jump, climb trees, and ride scooters, bikes, and skateboards all along the end of this cul-de-sac. Stroll into our neck of this neighborhood on almost any day after school or on a sunny weekend day, and you will be fortunate to see near our house the type of neighborhood that Normal Rockwell might have modeled a painting after: kids and parents alike out in their yards enjoying the community of neighborhood.

For these reasons, I am very concerned about how the proposed Development of Riverview at Las Palmas project might change our neighborhood in significant ways.

SAFETY – TRAFFIC & ROBBERIES: First and foremost, I am concerned about safety in this neighborhood. With increased traffic into this area, I am concerned that more people will drive into our neighborhood – and not up to the proposed area of development. Ask our guard and you will learn how many people he has to turn away as they are either a) looking for the wrong place, or b) simply lying about knowing somebody here as they want to drive through the neighborhood to scout the area. We have been able to reduce the amount of robberies and crime with the installation of a guard and gate. However, as more people enter this area, more and more people will want to (and possibly be able to) gain access to driving on our peaceful streets. Recently, I spotted a suspicious vehicle (and reported to the Sheriff, who did follow up on my concern), about a car who was scouting our neighborhood in the early mornings, pointing what was mostly likely a universal remote control for garage doors, testing to see what he could open. We do not need more of that in our neighborhood. We need fewer of these types of incidents. With more people driving into the main entrance of LP1 and the proposed development, there will be more people who will know about our neighborhood and who will want to gain access. 102.2

I am also concerned that people will enter our neighborhood instead of the new development and will not adhere to the strict speed limit of 15 miles per hour. We have many children in this neighborhood, and while their parents make their best effort to teach them to not run into the road, most young children don't really heed that warning. Neighbors here know to slow down. Other folks who are not from the neighborhood often cruise our streets in excess of 25 miles per hour and pose a real danger to children who might run out into the street.

SAFETY – FRONT ENTRANCE CONGESTION: Another grave safety concern is that traffic entering the front gate of Las Palmas will become increasingly dangerous. Recently, I turned into Las Palmas Road off of River Road and had to slow down significantly as there were 3 or 4 cars backed up at the guard entrance. Luckily, I had slowed to a reasonable speed and had no problem braking appropriately. However, with more people coming into the same entrance area to access the proposed new development, I am convinced that traffic coming off River Road onto Las Palmas Road will become backed up on a regular basis. And people coming here to visit might not have the sense to come into our neighborhood at a cautious speed. I can only imagine the number of accidents that could occur as a vehicle comes speeding around the corner and slamming into backed up vehicles at our entrance. I will refer you to the concerns originally expressed in the DSEIR: 102.3

From "DSEIR_PLN150372_Appendix B" under "2.3.1.1 Dangerous Intersection" (page 12) as part of the "Homeowners Assessment": "The entrance into Las Palmas Road from River Road will be heavily congested. Entering traffic, waiting for clearance from the guard shack, will back up into the deceleration lane on River Road and pose serious collision hazards."

Note that the three areas which received a grade of "Significant" Residual Impact on the "DSEIR_PLN150372_2_0_Summary" on Page 2-4 are all concerned with Transportation and Traffic, so there are other concerns regarding the impact of traffic to and in this neighborhood:

Summary Table page 2

Area of Concern	Significant Impact	Mitigation #	Mitigation Measure Summary	Residual Impact
Biological Resources	Potential loss or disturbance of western red bat.	BIO-4	Conduct pre-construction surveys.	Less than Significant
Biological Resources	Potential loss or disturbances of nesting birds.	BIO-5	Conduct pre-construction surveys.	Less than Significant
Transportation & Traffic	Add vehicle trips to SR 68.	TRA-1	Schedule shift changes outside morning and evening peak hours.	Significant
		TRA-2	Development shuttle service program.	Significant
Transportation & Traffic (Cumulative)	Add cumulative vehicle trips to vicinity intersections.	CTRA-1	Pay TAMC and Monterey County traffic impact fees.	Less than Significant
Transportation & Traffic (Cumulative)	Add cumulative vehicle trips to SR 68.	TRA-1, TRA-2, CTRA-1	"	Significant
Energy	Increased energy consumption.	ENG-1	Demonstrate how the project is consistent with the energy conservation policies of the Las Palmas Ranch Specific Plan.	Less than Significant

POLLUTION:

1) Visual Pollution: Without a doubt, the visual serenity of this neighborhood will be severely impacted by the addition of structures on the hills behind Las Palmas I. That, and the privacy of homes here will be affected by the views down the hill at our residences from the structures above. 102.4

2) Noise Pollution: Construction of new structures will proceed over a lengthy time. This means noise pollution from construction crews and traffic from large trucks into the area. Once completed, our neighborhood will have to endure increased noise from the added number of people living in these facilities, as well as the hum of machinery to operate those buildings – and the noise of traffic in and out of these facilities. 102.5

3) Air Pollution: During construction, dust and dirt will affect the air quality here. I have one daughter who suffers from asthma and my wife suffers badly from seasonal allergies. Added particulates in the air during construction of this new project will adversely affect the quality of health of members of my family, as I'm sure it will affect all others in our neighborhood. 102.6

For these reasons, I strongly urge the developer to find an alternate venue and access for his proposed facility. And I urge you to listen to the sincere concerns of people living in Las Palmas.

Respectfully,

Mark Miller
21176 Old Ranch Court

Letter 102

COMMENTER: Mark Miller

DATE: April 24, 2018

Response 102.1

The commenter provides a description of the Subdivision, and expresses concern that the Subdivision could change the neighborhood atmosphere.

As described in Topical Response C, neighborhood fit is not an environmental impact and is not directly analyzed in the Draft SEIR.

Response 102.2

The commenter expresses concern that project-generated traffic could increase criminal activity and unsafe driving in the Subdivision.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 102.3

The commenter describes existing congestion at the Subdivision entrance, and states that the project would exacerbate this problem. The commenter cites traffic comments from a report prepared by the Owners Subcommittee of Las Palmas I Subdivision. The commenter also notes that the Draft SEIR identifies significant traffic impacts.

Please refer to Topical Response D for a discussion of queuing concerns (congestion) at the Subdivision's entry gate. As noted therein, the project would increase inbound traffic at the gate by an estimated 16 percent. However, this increase in traffic would not substantially increase queuing. An additional westbound entrance lane at the gate would not be needed, and queuing vehicles would not obstruct vehicles from turning left onto Winding Creek Road. Therefore, the project would have a less than significant impact on traffic circulation related to queuing.

Response 102.4

The commenter states that the project would impact the visual serenity of the neighborhood and would reduce the privacy of Subdivision homes that would be visible from the proposed senior assisted living facility.

Please refer to Topical Response F regarding visual impacts. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Response 102.5

The commenter states that project construction, project operation, and project-generated traffic would result in noise impacts.

Please refer to Topical Response H for a discussion of the project's potential short- and long-term noise impacts, including traffic noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 102.6

The commenter states that project construction would add particulates to the air that would affect the health of Subdivision residents.

Suspended particulate matter emissions (including airborne dust during construction) are discussed in Section 6.0, *Air Quality*, of the Draft SEIR. As described therein, construction of the project would expose nearby residences to particulate matter emissions from the use of off-road equipment as well as large diesel-fueled trucks. Mitigation Measures AQ-1, AQ-2, and AQ-3 are required to reduce this impact to a less than significant level. These three measures require, respectively, the inclusion of dust control measures in the project's grading plan, appointment of a site monitor, and maintenance of equipment for low emissions. For a full description of particulate matter emissions and mitigation measures, refer to Section 6.0, *Air Quality*, of the Draft SEIR.

April 24, 2018

Letter 103

Mr. Joseph Sidor, Associate Planner
(Sidorj@co.monterey.ca.us) 831-755-5262
Monterey County RMA – Planning Second Floor
1441 Schilling Place
Salinas, CA 93901

Cc: Brandon Swanson, Planning Manager, Swansonb@co.monterey.ca.us
Roygobets@aol.com, Roy Gobets, 21056 Country Park Road, Salinas, CA 93908

Subject: **RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)**

Dear Mr. Sidor:

As a concerned homeowner in Las Palmas 1, I want to register my opposition to the proposed project and development of Riverview at Las Palmas. Its planned use of Las Palmas 1 roads will bring about unacceptable traffic, safety and security problems in our peaceful neighborhood. Plus, the large number of housing units and commercial use are inconsistent with the residential atmosphere that we residents chose and were promised when we located here. 103.1

Suburban paradise is what the Las Palmas Ranch developers promised, with our cluster of a neighborhood surrounded by open hillsides and nature. That's what we got in 1994 when we moved here. 103.2

Now it is all threatened by the proposed development on the hillside, just yards away from homes.

With a staff of 90, there will be such noise from car engines, horns, emergency sirens, visitors plus traffic problems will show up not only in our neighborhood but on adjacent roads including River Road and Highway 68.

Our homeowners association purchased the open space at the entrance to Las Palmas 1 for additional cushioning of a place for the visual enjoyment and use by homeowners, a place for children to play. Hundreds of vehicle trips in and out of our development daily to the commercial development would create an unsafe situation for children to cross and enjoy this feature.

Thank you for your consideration for our neighborhood concerns. I request that the application for PLN#150372 be denied and the land used for a residential or more compatible use fitting within the Las Palmas General Plan and the unique setting of our Las Palmas 1 development. 103.3

Sincerely,

David Nordstrand
17519 Sugarmill Road
Salinas, California
831-455-2877

RECEIVED
APR 25 2018
MONTEREY COUNTY
PLANNING DEPARTMENT

Letter 103

COMMENTER: David Nordstrand

DATE: April 24, 2018

Response 103.1

The commenter states that they are opposed to the project, and lists traffic, safety, security, and land use inconsistency as concerns.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 103.2

The commenter states that the project-generated traffic would cause noise and traffic safety impacts, including impacting the safety of children playing in the Corey Park open space.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

Regarding traffic along Corey Park, please refer to Topical Response D. As noted therein, the proposed project would not substantially increase safety hazards for pedestrians and bicyclists, including people accessing Corey Park.

Response 103.3

The commenter requests that the project be denied and that the land be used for a purpose that is more compatible with the residential setting.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

April 24, 2018

Letter 104

Mr. Joseph Sidor, Associate Planner
(Sidorj@co.monterey.ca.us) 831-755-5262
Monterey County RMA – Planning, Second Floor
1441 Schilling Place
Salinas, CA 93901

Cc: Brandon Swanson, Planning Manager, Swansonb@co.monterey.ca.us
Roygobets@aol.com, Roy Gobets, 21056 Country Park Road, Salinas, CA 93908

Subject: **RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)**

Dear Mr. Sidor:

As a homeowner in Las Palmas 1, I am writing to express my opposition to the proposed development of Riverview at Las Palmas commercial operation. 104.1

Our tightly clustered neighborhood lies in an amphitheater-like setting, surrounded by rolling hillsides and nature. Sounds in such a situation are a great concern. With an elderly mother in a similar facility in Sonoma County, I've spend a good amount of time (and discussion with my mother) observing the impacting traffic--large staffs with varying schedules, delivery trucks, ambulances, family visitors with multiple siblings and cars coming to visit or take resident seniors out for fun, the institution's excursion vehicles and buses for residents' trips to doctor offices or for fun rides, Ubers and taxis, and the unending ambulance and firetruck sirens as senior residents fall ill at all hours of the day and night. 104.2

The impact of this proposed development is not a good fit with our neighborhood's layout, tiny residential streets, and guarded entry situation. Our safety and security problems would be increased. 104.3

From Google Earth photos, it is clear to see how overwhelming the proposed project would be, and how the close proximity to houses would create visual and auditory impacts disrupting the way of life that was promised when we purchased homes in the 1990s. 104.4

Thank you for your consideration for our neighborhood concerns. I request that the application for PLN#150372 be denied and the land used for a residential or more compatible use fitting within the Las Palmas General Plan and the unique setting of our Las Palmas 1 development. 104.5

Sincerely,

Karen Nordstrand

Karen Nordstrand
17519 Sugarmill Road
Salinas, California
831-594-9410

RECEIVED
APR 25 2018
MONTEREY COUNTY
PLANNING DEPARTMENT

Letter 104

COMMENTER: Karen Nordstrand

DATE: April 24, 2018

Response 104.1

The commenter states that they are opposed to the project.

This commenter's opposition to the project is noted and herewith shared with the County's decision makers for their consideration.

Response 104.2

The commenter describes the potential for project-generated noise impacts due to traffic.

For a discussion of noise impacts, refer to Topical Response H. As described therein, traffic noise impacts would be less than significant or less than significant with mitigation incorporated.

Response 104.3

The commenter states that the project is not a good fit for the neighborhood due to safety and security concerns.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision.

Response 104.4

The commenter states that the project would create visual impacts and noise impacts that would disrupt the way of life of Subdivision residents.

Please refer to Topical Response F regarding visual impacts. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Please refer to Topical Response H for a discussion of the project's potential noise impacts. As described therein, noise impacts would be less than significant or less than significant with mitigation incorporated.

As described in Topical Response C, neighborhood fit and quality of life are not environmental impacts and are not directly analyzed in the Draft SEIR.

Response 104.5

The commenter requests that the project be denied and that the land be used for a purpose that is more compatible with the surrounding area.

The commenter's preference for denial of the project is herewith shared with the County's decision makers for their consideration. Refer to Topical Response C for a discussion of land use compatibility and policy consistency.

571 Foothill Road
Hollister, CA 95023

Letter 105

April 24, 2018

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place
Salinas, CA 93901

CC: Brandon Swanson, Planning Manager;
Jacqueline Onciano, Chief of Planning
Carl Holm, Planning Director
Roy Gobets, Home Owner

RE: Response to RVPL EIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr. Sidor,

My husband and I are gravely concerned about the impact of the proposed developed Riverview at Las Palmas that is before the planning commission for your consideration.

We are longtime residents and active community members in San Benito County, as ranchers we understand the dichotomy between being good stewards of the land protecting natural resources and developing part of our beautiful landscape to accommodate the growth in our society. 105.1

We were first introduced to Las Palmas Ranch about 5 years ago when our daughter moved into the community as a tenant. After careful consideration in the last 3 years, we have purchased 2 rental homes in this community. Our decision to move our assets from other income properties to this location was based on a number of factors, but a couple were critical. Being a small gated community in this ideal location and family centric makes it a wise decision for us.

Both of these properties are located Parkside within the community and the quality of life at both homes would be severely compromised by safety concerns. The number of cars entering the property each day creates safety concerns exiting Highway 68 and at the signal light to enter Las Palmas Ranch, not to mention the inability to safely monitor who is allowed on property to maintain the level of security currently enjoyed by residents in this neighborhood. 105.2

In addition, one home specifically backs up to the hill (located on Country Park) slated for development, where in winter storms we've already seen the stability of the hill compromised causing damage just a few doors down from our property. The removal of trees and construction on an unstable hill side will impact that further. 105.3

While we can certainly empathize with the need for additional assisted living facilities, we ask that you consider the needs and desires of your constituents in directly impacted by this new development. Putting at risk the safety of the families currently residing here, as well as the financial investments of all current property owners, seems grossly negligent and incongruent with the responsibilities of the commission to uphold the norms established by the Las Palmas Specific Plan, the General Plan and Toro Land Use Plan. 105.4

Thank you in advance for your time and consideration; we respectfully request that you deny the application for PLN #150372, aka River View at Las Palmas.

Sincerely,

Denise Donati
Property Owner

Letter 105

COMMENTER: Denise Donati

DATE: April 24, 2018

Response 105.1

The commenter provides a description of their experience as homeowners in the Subdivision.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 105.2

The commenter states that project-generated traffic would impact safety for vehicles exiting SR 68 and entering the Subdivision. The commenter states that the current level of security monitoring at the Subdivision entrance would not be possible if the project is approved.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks. Regarding the Subdivision's private security service, refer to Topical Response I, which discusses the project applicant's responsibility to share in the LPHOA's security costs.

Response 105.3

The commenter states that tree removal and construction on the elevated project site would impact the stability of the hillside slope.

Please refer to Topical Response E. As noted therein, 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, including slope stability.

Response 105.4

The commenter encourages denial of the project, citing the safety and financial investment of Subdivision homeowners, and the norms established by the LPRSP, the General Plan, and the Toro Land Use Plan.

The commenter's preference for denial is noted and herewith shared with County decision makers for their consideration. Refer to Topical Response C for a discussion of project consistency with applicable plans and policies. As noted therein, the project would be consistent with the LPRSP, the County General Plan, and the Toro Area Plan.

Letter 106

Address:

To: (Sidorj@co.monterey.ca.us),

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager, (831) 755-5334 same physical address
swansonb@co.monterey.ca.us

Jacqueline Onciano, Chief of Planning, (831) 755-5193, same physical address

oncianoj@co.monterey. ca.us

Carl Holm, Planning Director, (831) 755-4879, same physical address
holmcp@co.monterey.ca.us

roygobets@aol.com , Roy Gobets (831) 235-1701 21056 Country Park Road, Salinas, CA, 93908

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Reviewers,

I am a new resident of Las Palmas I since October 2017.

Having reviewed the Report, I have several concerns on the scope of the project, impact on traffic, security, environment ,and quality of life,

I am opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372), this large proposed non-residential development is inconsistent with the peaceful rural residential nature of the Las Palmas community.

106.1

1 Traffic

Traffic: First hazard to the community

During the construction

- Trucks with dirt load to level the parcel and the maintenance of the parcel (trees…)
- Engine for structuring the place on flat-bedded trucks
- Trucks for watering the surface
- Trucks loaded with construction material.

All of them passing by the gate around the entrance park and running to or from the project facility, will make a major hazard to the community, children, adults, and pets. I am also deeply concerned about the stability of the pavement, bordures and trees with an added flow of heavy truck traffic (we monthly pay an HOA fee for maintaining all infrastructures).

106.2

After the construction

- Food deliveries (1)
- Emergency vehicles (2)
- Medical waste
- Trash
- Linen, cleaning suppliers and others
- Employees (3)
- Residents of the facility (4)
- Guard (+/- 20% traffic increase)
- Visitors parking (5)

1) **18 wheelers** will be a big concern in the narrow streets along the park
2) This project is **miles far away** from the closest hospital, doctors…. Fire trucks, Police, emergency vehicles will have to enter the community on a regular basis.
3) Adding from 100 to 200 more residents could impact all roads around – 68, River Rd. -
4) **No** grocery stores, hairdressers or any commodities, malls, etc. at a 3/7 miles radius. There are no pedestrian facilities on SR 68, Reservation Road, or River Road. Pedestrian facilities are provided within the Las Palmas Ranch development along internal roadways. The only way to take a walk will be to use the Las Palmas Ranch park and trails.
5) There is no parking for visitors at the project plan, where will the visitors park?
6) All vehicles will go through a narrow street originally designed for residential traffic, using the guard entrance. There are no alternate routes in and out of the facility indicated on the site plan.

Guard entrance

Using the same entrance for all listed above, could lead to a long line of waiting cars and trucks for clearance by the guard, especially during rush hour, increasing hazard for the community on River Road that is a touristic road.

106.3

Emergency in case fire, flooding or other disaster - Disaster evacuation case, this is another major problem.

From the residents: **340 homes**

- **340+ cars or pickups** going to only one exit toward River Road.

Adding a new flow from the project: 144 beds + 12 to 21 employees on site each day

- **50 to 100 more cars + bus + emergency vehicles.**

400/450 cars-pickup-emergency vehicles will be added to the usual traffic, all going to only one exit, which will increase the traffic to 20 to 25 %.

From ***one problem*** (fire, flooding, quakes), we will add ***the human hazard*** on top of a natural disaster, all vehicles will go through a narrow street originally designed for residential traffic, using the same exit. ***There are no alternate routes in and out of the facility indicated on the site plan***.

Concern on traffic

Las Palmas is a quiet community -- children playing, people walking dogs, and residents enjoying the peaceful nature at the foothills of the Toro Park.

106.4

There is no compatible way between this development and the added traffic using the existing entrance to our neighborhood.

2 Security

Security is the second hazard to the community

Residents are secure, the HOA guard keep them informed about who comes into our community.

During the construction

- Security of the neighborhood would be compromised by opening the neighborhood to non-residents.
- As a community we have taken steps to preserve the security of the neighborhood including installing gates and employing security guards to check all incoming traffic.

After the construction

- The guard's duty is to link a visitor to a house in the Las Palmas community. Who would he call when the visitors would like to enter the community?
- As visitors of the facility, anybody will be able to enter the community.
- This proposed large non-residential development would open the neighborhood to incessant traffic, coming and going throughout the daytime and evening.
- It would be almost impossible to regulate this traffic and guarantee the security of the neighborhood.
- Make the entrance of Las Palmas Ranch 1 on River Road a challenge.

106.5

3 Environment

Environment and aesthetic are the third hazard to the community. This residential community is along the Toro Park foothills (State Park), and the large proposed non-residential development is inconsistent with the peaceful rural residential nature of the Las Palmas community.

The nature has designed the hill over the time, with rain and wind, if the project changes this balance; We will have flooding and mudslides during the rainy season, we already had severe flooding at the bottom of the hill in the fire department trail. Above and around the community, a wild community exists with more than **80 (70+ year-old) eucalyptus trees:**

- Habitat for Barn Owls** (endangered species) we can hear their hooting at night
    - There are feeding on mice, rats…, destroying their habitat could result to a proliferation of pest – like Voles (large field mice).
- Habitat for Great Horned Owls
    - There are feeding on mice, rats…, destroying their habitat could result to a proliferation of pest.
- Red Tails Oak
- Coyotes
- Bobcats
- Mountain Lions
- Deer
- A large diversity of birds in the trees area

106.6

**The Barn Owl is considered endangered now. A lack of environment remaining as well as access to food has put it on this list. That means that they can't find what they used to consume in such areas before. The fact that there are various farming methods that require moving around crops is part of this. The other is that many farmers continue to plant more and more to keep up with demand. http://www.owlworlds.com/owls-endangered/

On the project area, more than **80 (70+ year-old) eucalyptus trees**, only seen in this area, that will be removed under current plan.

- These trees provide reduction in wind, ridgeline exposure
- Hwy 68/RR noise abatement.

Concerns

Having a large and flat surface for the project:

- Will add a large amount of water going to the already too **small drain collector**.
- The water will use the road to the park as a quick evacuation.
- Adding more water at the bottom of the project will increase the chance of flooding.
- This last concern will make evacuation another **hazard to the Las Palmas Ranch 1 community**.
- Make **mud slides**, like winter 2016 under the project area.

106.7

Environment: *Noises during* and after *the construction (**echoing in the Las Palmas Ranch Valley**)*

- Cutting the trees
- Beeping sound of trucks and engine
- Truck engines leveling the project area
- All trucks engines digging operation
- Construction truck engines and other
- Truck engines surfacing the streets
- Food and other deliveries trucks
- Emergency vehicles (several a week)
- Visitors
- Employees
- General use of the project

106.8

Environment: Dust during and after the construction

- Cutting the trees (dust from wind)
- Leveling the project area
- All digging operations
- Construction
- Surfacing the streets
- Trucks going to or from the area

106.9

Environment: Smell during and after the construction

- Substantial numbers of meals
- Leveling area trucks engine
- All digging operation engine
- Construction products, roofing…
- Surfacing the street -gas and more-
- Trucks going to or from the area
- Regular operative odors
- Kitchens lunches, dinners…

106.10

4 Aesthetic

From all around our community, we enjoy the view of Toro Park hills, a peaceful rural residential area with nature as our backyard.

106.11

Trees, more than **80 (70+ year-old) eucalyptus trees**, only seen in this area (the only set of it are just here at the project development area)

- **From outside the community** would be able to see a disfigured landscape from
  - River Road,
  - 68 from Salinas
  - 68 to Salinas,
  - Spreckels Road
  - While Hiking in Fort Ord Monument, the project would be seen from a distance
- **From inside the community**: Project could be seen from almost every corner of Las Palmas Ranch

Concern

For all the describe above, a large <u>non-residential development</u> is firstly inconsistent with the peaceful rural residential nature of the Las Palmas community, and secondly this will bring the houses value down.

106.12

The Proposed Non-Residential Development

- Under the Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood.
- We have purchased our home and started to build our lives in reliance on Plans that provided an opportunity to live in and enjoy a rural residential neighborhood
- This parcel is zoned "medium density residential," at 2.61 units per acre.
- Under the Las Palmas Plan, this parcel was specifically approved for 8 units total, not 105 units as the project needs.

An assisted living facility **is not a residential use**, because it does not operate or function in a manner like independent residential units' employees are making the facility working not residents.

Conclusion

WHY HERE?

This is inconsistent with The Las Palmas and Monterey County Plan

1. In the report, there is **no mention on impact on life and depreciation of living for the Las Palmas residents**, it's looks like **<u>we are the negligible amount</u>**.
2. (***From 8 units as MDR to 105 units***) This parcel is zoned "**medium density residential**," at 2.61 units per acre. Under the Las Palmas Plan, this parcel was specifically approved for 8 units total. The developer now seeks a "**conditional use permit**" to allow development of a non-residential facility with a total of 105 units.
3. (**Non-residential development)** The proposed development is a **non-residential use**. The proposed Assisted Living Facility does not operate or function in a manner consistent with the Las Palmas Plan, nor the rural nature of the community.
4. The residents of the Assisted-Living Facility will be isolated, being miles from any hospital, medical aids, grocery stores, parks, walking trails.

5. (**Non-residential development)** Approving this amendment to the Las Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community and the value of each house.
6. There are no facilities of any type in a 3 to7 miles radius for the project residents.
7. Las Palmas is a highly desirable residential community. Residents have invested here, based on the rural nature of this community under the approved Las Palmas Plan. Residents have relied on the approved Las Palmas Plan and its resulting development.

I respectfully request you to carefully consider these issues when considering this proposed development **having first in mind the 340 houses** of the Las Palmas Ranch 1, the respect of the environment and the well-being of the elderly.

Thank you for your consideration.

Respectfully submitted.

Dominique Fontana

Letter 106

COMMENTER: Dominique Fontana

DATE: April 24, 2018

Response 106.1

The content of this letter is the same as the content of Letter 56. Please refer to Responses 56.1 through 56.13 above.

Letter 107

From: The Freshwaters
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103; roygobets@aol.com
Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)
Date: Tuesday, April 24, 2018 9:52:11 PM

Joshua and Amelia Freshwater April 24, 2018
21127 Old Ranch Ct
Salinas, CA 93908
(559)355-5392

To: (Sidorj@co.monterey.ca.us),
Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901
(831) 755-5262

Cc: Brandon Swanson, Planning Manager (Joe's Supervisor), swansonb@co.monterey.ca.us
Roy Gobets, 21056 Country Park Road, Salinas, CA, 93908, roygobets@aol.com ,

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello,

We are very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. Furthermore, the large number of housing units proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they purchased/rented their homes here in the first place. 107.1 107.2

I strongly urge the developer to find an alternate location for his proposed commercial facility.

Please respond to the issues I listed above in writing.
Respectfully,

Joshua and Amelia Freshwater

Letter 107

COMMENTER: Joshua and Amelia Freshwater

DATE: April 24, 2018

Response 107.1

The commenters state that they are concerned about the project's impacts on traffic, safety, and security.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not result in a significant impact on police protection within the Subdivision, and the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 107.2

The commenters state that the project is a large commercial project that is inconsistent with the surrounding residential area. The commenters urge the developer to find an alternate location for the project.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Letter 108

From: Evette Selva-Kirby
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103; roygobets@aol.com; 1ourtoy@comcast.net
Subject: RVPL Draft SEIR for Proposed Development of Riverview at Las Palmas (PLN#150372)
Date: Tuesday, April 24, 2018 11:07:56 PM

Dear Mr. Sidor,

My husband and I have lived in Las Palmas I for 21 years and we love it here. When we heard about the proposed project, we kept an open mind, however, as more information became available, we became very concerned. It is one thing for a limited number of single family homes to be built in Riverview for seniors which could be a good possible use. Having an assisted living facility which will result in high traffic levels where the only access is the current entrances in Las Palmas is a safety issue as well as a security issue. This is a family neighborhood where kids play outside freely. Residents pay extra fees for security to monitor access which has kept crime low. You see walkers, runners and families just enjoying the neighborhood. With the proposed project, more vigilance will be needed. There will be the need for employees to come and go as well as family members of residents, ambulances and others 24/7. This will change this neighborhood, unfortunately not for the better. 108.1

A project of the scope proposed is not a good fit for this site and my husband and I would urge the developer to find a more suitable location with the proper infrastructure to support it. 108.2

Please respond to the issues listed above in writing. Thank you for your attention to this matter.

Respectfully,

Evette and Jim Kirby
21155 Old Ranch Court
Salinas, CA 93908
831-455-1722 (home)
831-682-0144 (cell)

Letter 108

COMMENTER: Evette and Jim Kirby

DATE: April 24, 2018

Response 108.1

The commenters state that the project would add traffic into the Subdivision, which would compromise security gate operations at the Subdivision entrance and impact the safe neighborhood atmosphere.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety, including queuing at the Subdivision entrance. As noted therein, the project would not result in a significant impact on police protection within the Subdivision, and the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks.

Response 108.2

The commenter states that the project is not a good fit for the project site, and urges the developer to find a different location for the project.

Please refer to Topical Response C and Response 8.11. The project would be consistent with the site's zoning and land use requirements, and the project site is appropriate for an assisted living facility, given market factors.

The commenter's preference for an alternate location is noted and herewith shared with County decision makers for their consideration.

April 24, 2018

Letter 109

Randy Radke
17608 River Run Road
Salinas, CA 93908

Joseph Sidor, Association Planner
Monterey County Resource Agency – Planning
1441 Schilling Place, 2nd Floor
Salinas, CA 93901

Re: Draft EIR for Riverview at Las Palmas Assisted Living Senior Facility (Parcel Q)

Dear Mr. Sidor:

I am writing this letter to you to express my concerns about the DEIR for Riverview at Las Palmas Assisted Living Senior Facility and the potential impact that project would have on our community, Las Palmas Ranch No. 1. 109.1

My wife, son and I moved to this area from Seattle about 3 years ago. We rented a home for the first year while familiarizing ourselves with the different communities in Monterey County. We specifically chose, and purchased our home, in Las Palmas Ranch No. 1.

This community offered a quiet rural setting, nestled back against the hills spotted with Oak, Buckeye, Eucalyptus and Manzanita. These hills behind our house are the home to deer, who frequently take shelter under the trees; we are visited by fox, coyotes, and the occasional bobcat and mountain lion; we wake up each morning to the soft mooing of the cattle grazing on the hillside. Falcon's, hawks, owls, and a plethora of other birds nest in the trees delighting us with their songs. It's in a sun belt so we don't get the marine layer grey, a gentle breeze blows through the hills providing relief from the heat of summer, we can sit out on our deck in the evening and look up at the stars shining brightly against the night sky.

The community itself is family friendly and safe. There have been extra measures taken to ensure security with a guard at the main entrance and a gated second entry. The children can play outside, ride their bicycles and skateboards, setup lemonade stands, etc. without having to be concerned about their safety and well-being. The community as gone to lengths to create this environment, including street bollards, speed limit signs and speedbumps for traffic control and our safety… 109.2

… but all of this will change, the quality of community life will be negatively impacted if the Riverview at Las Palmas Assisted Living Senior Facility plan is approved.

Two ancient philosophers, Plato and Aristotle, debated their theories of Universals and Particulars. I would like to express the merit of both theories in regard to the Parcel Q project.

My universal concerns are the following:

1. **Not the Intended Use:** The project is inconsistent with the Las Palmas Specific Plan, as evidenced by the Applicants request that the Specific Plan be amended. The Riverview at Las Palmas Living Senior Facility structures go well beyond the intent of "residential housing" and "density" limits as set forth therein. The intent was for residential single family units not a major campus like facility with multi-story complexes and smaller structures for housing mentally and physically impaired. It also sends a message that the Specific Plan and it's intended purpose it was drafted for in the first place, can be tossed aside if the price is right. 109.3

2. **It's all about the Money**: The Applicant has no long term vested interest in the community or the impact on the existing community; they are in it for the sole purpose of making money. This is evidenced by the fact that the Applicant has the property up for sale and actively seeking a buyer. This would lead me to question their "sincere" concern for how their proposed changes will impact the community and quick and impartial remediation of the many concerns raised. Or tossing everything issues and all over to an unexpected buyer who has no background or knowledge about the site. 109.4

3. **It's all about Location, or is It?** Is this "really" the right location for this kind of facility? Think about it, a facility that houses a large population of physically and mentally impaired patients built on a steep hillside next to a family community– is that safe for either party, I can just envision run-away-wheelchairs, and battery powered carts that don't have enough power to get up the hill, individuals with dementia who wonder into the community lost and disoriented, frightening the children. There is no immediate access to services required (hospitals, doctors offices, psychiatric care, pharmacies, grocery, etc.).. 109.5

4. **Cumulative Impact, When is a little more a little too much?** With the approvals or pending approvals of projects such as Ferrini Ranch and Harpers Canyon, it has been alleged that some of the rational in approving the projects were "It is good for the community" yet the communities are against them; "We know HWY 68 Traffic is a level F, but the overall good outweighs the bad" "As a part of the project there will be highway improvements" yes extending the two lines, is a good, but that is a small section of highway improvements, "there will be new traffic lights and or a roundabout's installed" ; those are good traffic controls, but efficient – more like congestion? How many more projects can the surrounding communities support before the infrastructure and resources collapse without major reengineering? 109.6

This is where I will address the Particulars as pertaining to Parcel Q and the Las Palmas Ranch No.1 community. How many issues must be raised before it becomes beyond reason or resource to move forward with a project of this scale. I know that you have received a number of letters from the community, groups like Landwatch, and the Las Palmas Ranch No.1 HOA, so I will be brief.

Traffic Impact: Entrance and streets are not designed to support the increased volume of traffic. The single entrance and guard gate will be a bottle neck likely causing backups in both direction on River Road. There is insufficient access for emergency evacuation in case of fire, or other. Increased in non-residential traffic driving around in the community. 109.7

Geological Impact: We already have issues with surface water runoff, ground slides, and drainage. Grading of the hillside and ridge, removal of the vegetation will contribute erosion and drainage issues. 109.8

Biological Impact: Removal of trees and semi forested areas will destroy natural greenbelts, driving off the wildlife and disturbing the balance of predator and prey, hello ground squirrels, voles and field mice. 109.9

Water Supply Impact: What is the estimated water usage anticipated for this project? There are already water overdraft concerns for the Salinas Valley. How about processing the volumes of waste water. Will the consumptive use of recycled water and irrigation meet the demands of both communities? 109.10

… and the stars won't shine quite as bright with the light noise. 109.11

Thank you for taking the time to read this letter. I hope that you take my concerns and the concerns of my neighbors in Las Palmas Ranch No1. into consideration when making a decision that will impact our community, our home.

Sincerely,

Randy Radke

Letter 109

COMMENTER: Randy Radke

DATE: April 24, 2018

Response 109.1

The commenter provides a description of the Subdivision.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 109.2

The commenter states that the project would negatively impact quality of life and safety in the Subdivision.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision. Please also refer to Topical Response C. As described therein, quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

Response 109.3

The commenter states that the project is inconsistent with the LPRSP and would require an amendment to the plan. The commenter states that the project site was intended for development of residential homes. The commenter states that project approval would indicate that a Specific Plan can be dismissed "if the price is right."

The project is a senior assisted living facility. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR requires an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 109.4

The commenter states that the project site is listed for sale, and expresses concern about a new landowner assuming responsibility for the project.

The comment is noted; however, property ownership is not considered an environmental impact under CEQA. Therefore, no further response is required.

Response 109.5

The commenter expresses concern about placing a senior assisted living facility on top of a hillside next to a residential neighborhood.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision. Please

refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 109.6

The commenter expresses concern about cumulative traffic and infrastructure impacts due to allowing multiple projects in the area, including the Ferrini Ranch project and the Harper's Canyon project.

Regarding traffic impacts, refer to Topical Response D. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable. Additionally, the Draft SEIR included the following analysis: "The cumulative traffic generation (existing plus project) is 8,009 trips per day (68% of projected), 3,712 trips less per day that originally estimated for Las Palmas Ranch."

Response 109.7

The commenter states that the project would result in traffic congestion at the Subdivision entrance, and that the road system would be insufficient for emergency evacuation.

Please refer to Topical Response D. The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project.

Response 109.8

The commenter states that the area has existing problems related to stormwater drainage and geologic instability that would be worsened by the project's grading and vegetation removal activities.

Please refer to Topical Response E. As noted therein, 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, including slope stability.

Response 109.9

The commenter states that the project's tree removal would destroy natural greenbelts, drive off wildlife, and disturb the balance of predators and prey.

Tree removal and impacts to wildlife are discussed in Topical Response G and Section 7.0, *Biological Resources,* of the Draft SEIR. As noted in Topical Response G, impacts to common wildlife species would not be considered significant under CEQA and potential impacts to special status wildlife is mitigated through implementation of the Draft SEIR mitigation measures requiring preconstruction surveys and avoidance.

Response 109.10

The commenter asks how much water the project would use, and states that there are existing overdraft concerns for the Salinas Valley. The commenter notes that the project would require wastewater service, and asks if recycled water would meet the demands of both communities.

As indicated in the Draft SEIR (Section 10.0, *Water Supply*, pages 10-11 to 10-12), the project would increase potable water demand by up to 11.4 AFY. The proposed project would use recycled water for landscaping, however its use would still be minimal due to the use of low-water use landscaping. As a result, the project's use of recycled water would not be expected to affect the use of any existing customers.

Although the Salinas District is currently in overdraft, actions taken by both California Water Service and MCWRA, including conservation, system improvements, and future projects are projected to continue to provide for a reliable water supply. In its Urban Water Management Plan California Water Service projected its groundwater supply for the Salinas District will fully meet future demands through 2040. The proposed project would be new, and be designed, constructed, and operated with water conservation in consideration at the outset. The project would utilize the most current water efficient fixtures available, use minimal water for landscaping, and practice conservation in every day operation. Refer also to Response 3.3.

Response 109.11

The commenter states that the project's lighting would impact night sky views.

Please refer to Topical Response F, which discusses impacts of the project's lighting on night sky views. As described therein, mitigation is recommended to reduce lighting impacts to a less than significant level.

April 24, 2018
Kimberly Zook
17792 Riverbend Road Salinas, CA 93908

Letter 110

Joseph Sidor, Associate Planner Monterey County RMA-Planning Second Floor 1441 Schilling Place, Salinas, CA 93901

C.c. Brandon Swanson, Planning Manager;
Jacqueline Onciano, Chief of Planning
Carl Holm, Planning Director
Roy Gobets, Las Palmas Ranch Homeowner

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr. Sidor,

I am submitting formal comments in opposition to the proposed development of Riverview at Las Palmas. As a resident of the Las Palmas Ranch Community, mother of a small child and active community member, I strongly urge you to deny the application and proposal to develop this parcel. Below are my reasons to oppose this development: 110.1

1. Wildlife and Biological impacts: The property proposed for development are open space, a place which provides important habitat for California Bird Species of Special Concern and many other wildlife species. The native wildlife would be negatively affected by the excessive vehicular traffic, lighting, loss of habitat, and other man-made stresses. 110.2
2. The proposed area is in view of an official County Scenic Route designation which will not promote sensitive visual resources. 110.3
3. Increase of traffic safety hazards to residents and pedestrians. This proposition would also allow for the increase of mass transit and non-residential vehicular traffic while infringing on our private property rights. In addition, the enormous anticipated emergency personnel response through a highly used park area is of great concern. My young child along with many other youth in the community utilize this park area of outside play, exercise, recreation and learning the importance of building a sense of community. 110.4
4. Emergency Evacuation Congestion. Las Palmas Ranch offers two entrances and exits for all residents and guests. The main entrance/exit at Las Palmas Road would not allow for evacuation flow of the residents in the development and community members. During a natural disaster, fire, earth quake, or flood, this congestion and over population for the infrastructure could have dire results. 110.5
5. Impacts to the local community. The Spring green mountain area is a highly sought after location due to its unique character and access to natural areas. The proposed development offers little to no benefit to the local community; however, it is expected to impact quality of life for the reasons stated above. Any economic benefit to the County could be negated by a reduction in local property values, specifically in the highly sought after community of Las Palmas Ranch. 110.6

In summary, the proposed use will diminish the character of Las Palmas Ranch, a cherished residential community. The proposed development is in direct conflict with the Monterey County Master Plan that clearly states a goal to conserve open space to protect and enhance unique or distinctive areas of Monterey County. Allowing the addition of a developed living community in the open space would be in direct conflict with these goals and priorities. The overall residential experience would be severely compromised by the addition of any development in this proposed area. 110.7

For the reasons outlined above, I am strongly opposed to the development and sincerely hope you will consider the impacts to the surrounding community including property values, private property rights, open

space, recreational park users, and wildlife when you evaluate the application and ultimately make a decision on this extremely important matter. The proposed development is not in accordance with the Monterey County Master Plan. Therefore, I request you deny this proposed development.

Respectfully,

Kimberly Zook
17792 Riverbend Road Salinas, CA 93908

Longtime resident, Voter, Tax Payer, Resident of Las Palmas Ranch

Letter 110

COMMENTER: Kimberly Zook

DATE: April 24, 2018

Response 110.1

The commenter states that they are opposed to the project and urge that the development proposal be denied.

This commenter's opposition to the proposed project is noted and herewith shared with the County's decision makers for their consideration.

Response 110.2

The commenter states that the project site provides habitat for wildlife, including special status species, and that the project's habitat removal, traffic, and lighting would impact the wildlife.

Tree removal and impacts to wildlife are discussed in Topical Response G and Section 7.0, *Biological Resources,* of the Draft SEIR. As noted in Topical Response G, impacts to common wildlife species would not be considered significant under CEQA and potential impacts to special status wildlife is mitigated through implementation of the Draft SEIR mitigation measures requiring preconstruction surveys and avoidance.

Response 110.3

The commenter states that the project site is visible from a County Scenic Route.

Please refer to Topical Response F regarding impacts to scenic routes. As stated therein, impacts would be mitigated to less than significant by landscape screening, earth-toned building colors, underground of utility and distribution lines, and unobtrusive lighting.

Response 110.4

The commenter states that the project would increase traffic safety hazards, bringing mass transit and non-residential traffic through the Subdivision, including along a recreation area (Corey Park).

Regarding traffic along Corey Park, please refer to Topical Response D. As noted therein, the proposed project would not substantially increase safety hazards for pedestrians and bicyclists, including people accessing Corey Park.

Response 110.5

The commenter states that in the event of an emergency evacuation, the Subdivision's main entrance would be dangerously congested.

Please refer to Topical Response D. The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project.

Response 110.6

The commenter states that the project's economic benefits would be outweighed by the reduction in Subdivision property values.

Please refer to Topical Response C. As described therein, property value is not an environmental impact and therefore is not analyzed in the Draft SEIR.

Response 110.7

The commenter states that the proposed project would diminish the residential character of the Subdivision. The commenter states that the project conflicts with the Monterey County Master Plan (General Plan) goals to preserve open space and enhance unique or distinctive areas.

Please refer to Section 5.4 of the Draft SEIR regarding visual character impacts. Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Letter 111

From: Megan E. Giovanetti
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103; roygobets@aol.com
Subject: RVPL Draft SEIR for proposed development of riverview at las palmas (PLN#150372)
Date: Wednesday, April 25, 2018 9:56:07 AM

Mr. Joseph Sidor, Associate Planner
Mr. Brandon Swanson, Planning Manager
Monterey County Planning Comission

Mr. Sidor and Mr. Swanson;

I write as a resident of Las Palmas I. I am opposed to the Proposed Development of Riverview at Las Palmas (PLN#150372)

I appreaciate what the proposed development does for the senior community. However, I am strongly opposed to the proposed location for this development. Las Palmas currently has a very quiet and peaceful solely residential nature. 111.1

I. Traffic

Traffic is one of my main concerns. The proposed non-residential development would bring a massive amount of added traffic through our neighborhood. To name a few; commercial vehicles -- food deliveries, medical waste, trash, linen, etc, -- and numerous employee and visitor vehicles through a narrow street originally designed solely for residential traffic. This constant and increased traffic would irrevocably alter the peaceful nature of the community. Las Palmas is a quiet community -- children playing, people walking dogs, and residents generally enjoying the peaceful nature of the rural neighborhood. There is no way for this development and attendant traffic to use the existing entrance to our neighborhood and not destroy the peaceful nature of the neighborhood. 111.2

II. Security

Security of the neighborhood would be compromised by permanently opening the neighborhood to this non-residential development. As a community we have taken steps to preserve the security of the neighborhood including installing gates and employing security guards to check all incoming traffic. Residents are secure in knowing who comes into our community. This proposed large non-residential development would open the neighborhood to incessant traffic, coming and going throughout the daytime and evening. There is no way to regulate this traffic and guarantee the security of the neighborhood. This is a real concern. Will this proposed community also provide security? Or pay for a portion of our security guard? Will they have a list of people that have been cleared to enter or visit? How do we know that people won't just drive through our entrance claiming to be visiting the nursing home but intending to do otherwise. We currently have very low crime rates because people know that our community is guarded. 111.3

III. The Proposed Non Residential Development is Inconsistent with the Existing Residential Community

Under The Las Palmas Plan and Monterey County Plan, Las Palmas Community was approved and developed as a rural residential neighborhood. Residents purchased their homes and built their lives and their community in reliance on Plans that provided an opportunity to live in and enjoy a rural residential neighborhood. I know personally this is why I purchased my home. I have children and I want a place that they can safely go and play outside. I fear that with the reduction in security being able to adequately determine who should and should not be in our neighborhood, I will question whether or not it is safe enough for my kids to be outside unsupervised. 111.4

This parcel is zoned "medium density residential," at 2.61 units per acre. Under the Las Palmas Plan **this parcel was specifically approved for 8 units total. The developer now seeks a "conditional use permit" to allow development of a non-residential facility with a total of 105 units.** This is inconsistent with The Las Palmas and Monterey County Plans.

The developer seeks to circumvent these plans by requesting an amendment for a non-residential use.

Very simply, the developer is asking for approval of non-residential use in a planned residential community.

Las Palmas is a highly desirable ***residential community.*** Residents have invested here based on the rural nature of this community under the approved Las Palmas Plan. Residents have relied on the approved Las Palmas Plan and its resulting development. The proposed development is a non-residential use. The proposed Assisted Living Facility does not operate or function in a manner consistent with the Las Palmas Plan, nor the rural nature of the community. 111.5

To approve this amendment to the Las Palmas Plan and to allow development of a non-residential Assisted Living Facility with 105 units, and all the commercial traffic, deliveries, medical waste, employees, visitors, and resulting security and safety concerns would unalterably destroy the rural residential nature of our community.

I request you please carefully consider these issues when considering this proposed development. This proposed non-residential development is inconsistent with the existing residential community, and should not be approved.

Thank you for your consideration.

Respectfully submitted.

Megan Giovanetti

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Letter 111

COMMENTER: Megan Giovanetti

DATE: April 25, 2018

Response 111.1

The commenter states that though they appreciate what a senior living center would provide for its residents, they are opposed to the project being built at the proposed location.

This commenter's opposition to the project in this location is noted and herewith shared with the County's decision makers for their consideration.

Response 111.2

The commenter states that the project would add a massive amount of traffic through the Subdivision and that the traffic would disrupt the peaceful nature of the Subdivision community.

For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision.

As described in Topical Response C, quality of life is not an environmental impact and is not directly analyzed in the Draft SEIR.

Response 111.3

The commenter states that the project would compromise security operations at the Subdivision entrance. The commenter asks if the senior living center would have its own security operations, or if the applicant would contribute to the Subdivision's security costs. The commenter asks if the senior living center would provide a list of people that were cleared to enter the Subdivision, and discusses the potential of criminal activity as a result of unscreened visitors.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision. Regarding the Subdivision's private security service, refer to Topical Response I, which discusses the project applicant's responsibility to share in the LPHOA's security costs.

Response 111.4

The commenter states that the project site is zoned medium density residential, for 2.61 units per acre, and that the parcel is approved for a total of eight units. The commenter states that allowing development of a non-residential facility with 105 units is inconsistent with the LPRSP and the General Plan.

Regarding the residential unit cap of the LPRSP, refer to Topical Response C. As noted therein, the proposed project is not a residential use under the County code or LPRSP; as such, the residential unit limitation of 1,031 does not apply to the project.

Response 111.5

The commenter reiterates concerns about land use incompatibility and requests that the project be denied.

The commenter's opinion is noted and herewith shared with the County's decision makers for consideration. Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Letter 112

From: Cindy Grover
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103
Subject: RVPL Draft SEIR for proposed development of Riverview at Las Palmas (PLN#150372)
Date: Wednesday, April 25, 2018 4:33:58 PM

Dear Mr. Sidor,

We are the original owners of our home, and in fact, among the very first people to move into Las Palmas Ranch I. Please add our names to the long list of people who are concerned about the proposed project. When we purchased our property, we were aware of the various additional Las Palmas areas --- such as the custom home lots at the top of Riverview Court and the commercial property at the Las Palmas entryway (which was later purchased by the LPR 1 homeowners). 112.1

It was our understanding that the land along the ridge, Parcel Q, was zoned for residential use. We are opposed to the proposed commercial development of a large care facility on that property. Traffic, waste water, round-the-clock noise and activity, stability of the hillside, removal of trees, and light pollution are all issues that cause us serious concern. As longtime Monterey County residents, we are aware of the continual effort to preserve the beauty of our county ... and in particular the Highway 68 corridor. We believe this development is at odds with that effort.

Thank you for your time and consideration in listening to us. As you no doubt have heard from many others, we also respectfully request that this application be denied and the property remain reserved for residential development. 112.2

Sincerely,
James and Cynthia Grover
17803 Riverbend Road
Salinas, California 93908

Letter 112

COMMENTER: James and Cynthia Grover

DATE: April 25, 2018

Response 112.1

The commenter states that they are concerned about the project, and that they understood the project site to be zoned for residential use. The commenter lists specific concerns, including traffic, wastewater, noise, hillside stability, tree removal, light pollution, and preservation of the SR 68 corridor.

The project is a senior assisted living facility. The project site is zoned Medium Density Residential (MDR). The Draft SEIR notes that a senior assisted living facility is similar to a rest home, which is an allowed MDR use. The Draft SEIR recommends an amendment to the LPRSP to clarify that an assisted living facility is an allowed use. Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 112.2

The commenter requests that the project be denied and that the project site be used for residential development.

This commenter's preference for denial and noted and herewith shared with the County's decision makers for their consideration.

Letter 113

From: Tetyana Margolina
To: ceqacomments; Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; roygobets@aol.com
Subject: Draft SEIR on the River View at Las Palmas Assisted Living Senior Facility project (PLN150372)
Date: Wednesday, April 25, 2018 1:04:58 AM

Attn: Joseph (Joe) Sidor, Associate Planner
Monterey County Resource Management Agency – Planning
1441 Schilling Place, 2nd Floor, Salinas, CA 93901

Cc: Mr. Brandon Swanson, Planning Manager
Mr. Roy Gobets, 21056 Country Park Road, Salinas, CA 93908

FROM: Leonid Ivanov, Tetyana Margolina
21016 Country Park Rd, Salinas, CA 93908
Phone: (831) 224-0130
E-mail: margolinat@gmail.com

Dear Mr. Sidor,

As residents of the Las Palmas I (LPI) sub-division, we strongly oppose the River View at Las Palmas Assisted Living Senior Facility project. The Draft SEIR provides sufficient information to conclude that the project will be destructive for the established residential community, will negatively impact the local environment, and will not be beneficial for the Monterey county residents. Our main concerns are listed below with reference to the DEIR sections. 113.1

Site Access and Land Use

The access to the site will be through a single private route, which belongs to and is maintained by the Las Palmas I HOA (Section **4.0 Project Description**). 113.2

The developer's statement that the project applicants are members of the LPI HOA (p. 4-17) is a misrepresentation of facts, as confirmed by the LPI HOA President. In fact, if they were our HOA members, they would have to comply with the HOA CC&Rs by obtaining approval for their project from owners of all homes adjacent to the project site, and from the HOA Board. 113.3

The statement that "The applicants will pay a proportional share for the use of the roads and drainage system" (p.4-17) is too vague to be considered valid. Proportional to what? Is there any agreement with the HOA? What happens if the site is sold? Apparently, the developers rely on the LPI homeowners to continue maintaining the private streets, which will be heavily exploited by the site owners during the construction phase, for transporting heavy construction machinery and for several thousand trips of large dump trucks (34,500 CY of fill dirt will be brought in, p. 4-17). The same private route will then be used as the only access to the Assisted Living Senior Facility by business, private, public transportation (shuttles), and emergency vehicles. The use of the private LPI roads will significantly exceed the intended use of easement for Parcel Q, which implied residential use of the site within the scope of the Las Palmas Specific plan.

DEIR describes this access route as a "private loop drive" (p. 4-17), while in fact it is not looped and provides no alternate or bypass options. In case of fire or another emergency, this single 113.4

route will be the only evacuation outlet for both the Assisted Living Senior Facility and residents of many LPI houses, including ours. If this happens, we all will become hostages of a traffic jam in the narrow passage between Parcel Q and the River Road, with firefighters and other emergency vehicles stuck in the opposite direction. The total population of the Assisted Living Senior Facility (based on estimates on pp. 4-20–4-21) is expected to be ~170-180 people, which will significantly add to the number of people who relies on the Woodridge Court – River Run Rd as the only emergence exit. Note that they would then be joined by a big part of the LP1 population (total of ~400 families) on the River Run Rd – Las Palmas Rd route.

Environmental Setting

The Las Palmas I sub-division has been established and preserved as to meet the Toro Area Plan philosophy of "***the essentially rural quality of life***" (Toro Area Plan). It is a tranquil rural area, safe for older people and for families with kids, dark at night, and naturally quiet. It follows a pure day/night cycle, in peaceful coexistence with wild life. The green open spaces and trees of several parks carefully maintained by the LPI community, compliment the surrounding hills and the historic Corey house. 113.5

The suggested project will alter all these qualities by introducing business-induced traffic through the LPI private roads, uncontrollable flow of visitors and employees through the community, and anthropogenic noise 24/7. The scenic surroundings will be negatively affected by the changed ridgeline and [downward] directed light contamination.

Note that the business traffic is intended by the developer to peak outside the normal traffic peak hours, to mitigate the project impact on the county roads (**9.0 Transportation**). This will introduce early morning and late night traffic to the LPI location, in addition to daytime flow of delivery and service vehicles, residents, and visitors of the Assisted Living Senior Facility.

Mud slides, earthquakes, and flooding

When estimating possible increase of natural disasters (landslides, earthquakes, flooding), the developer claims no significant effect on the project site but dismisses any negative effects for the LPI sub-division. However, the project will increase the risk of mud slides and flooding for the LP1 houses since they are located at the lower grounds below the Parcel Q. 113.6

Alternatives

If located in a right place, a Senior Living Facility can be beneficial for Monterey County residents. However, the present project uses an unsuitable location, which is distant from established infrastructure, does not have available medical care in a close proximity, and has a limited connection to public roads. It is intended to serve needs of senior citizens of Monterey County but will inevitably harm a comparable number of Las Palmas I residents, who have lived here for years and decades and have invested into the current state of the sub-division, as well as into the Monterey county wellbeing. The proposed project will reduce their quality of life, diminish their property value, and introduce an additional financial burden to mitigate its negative effect on the community. 113.7

The Las Palmas I sub-division is a desirable location, which attracts buyers of all ages, from young families to retirees, by its rural character combined with well-maintained, safe, and purely residential community. In fact, the developer is also relying on all these qualities in support of his project. Introducing such a large-scale and fluid business as an Assisted Living Residential Facility will remove this attractive character, cause high turnover of LPI residents, and make the area crime-prone.

We strongly encourage the developer to consider the most obvious alternative (not even mentioned in the DEIR) to follow the Las Palmas Specific plan, and use Parcel Q to build several high-end homes. 113.8

We appreciate your attention to our concerns and comments. We would also like to be notified of the public hearings when scheduled.

Respectfully,

Leonid Ivanov

Tetyana Margolina

Letter 113

COMMENTER: Leonid Ivanov and Tetyana Margolina

DATE: April 25, 2018

Response 113.1

The commenters state that they are opposed to the project. The commenters state that the Draft SEIR indicates that the project would be destructive to the Subdivision community, would negatively impact the local environment, and would not be beneficial to County residents.

This commenters' opposition to the project is noted and herewith shared with the County's decision makers for their consideration. The commenter's individual concerns are listed and responded to below in the subsequent numbered comments.

Response 113.2

The commenter states that the project site would be accessed through the private Subdivision entry.

This comment does not conflict with or challenge the analysis and conclusions of the Draft SEIR. However, the comment is herewith shared with the County's decision makers for their consideration.

Response 113.3

The commenter disputes the Draft SEIR statement that the project applicant is a member of the Subdivision LPHOA. The commenter states that the Draft SEIR's description of the applicant's financial obligation to the LPHOA is too vague and that it doesn't account for the possibility that the project could be sold to a new owner. The commenter states that project-generated traffic would damage the Subdivision's private roads.

Page 4-17 of the Draft SEIR states that the project applicants are members of the LPHOA, have paid dues to the association, and would pay a proportionate share for the use of the roads and the drainage system. As noted in Topical Response I, page 4-6 of the Draft SEIR has been revised to clarify that an agreement would be required between the LPHOA and the project applicants, who own the project site, to clarify cost-sharing and responsibilities . This includes connection to stormwater drainage facilities, road maintenance , and cost-sharing for private security service.

For a discussion of traffic impacts within the Subdivision, refer to Topical Response D. As noted therein, the project would not result in a substantial increase in traffic within the Subdivision.

Response 113.4

The commenter disputes the Draft SEIR description of the access route as a "private loop drive", stating that it is not looped and provides no alternate or bypass options. The commenter states that the Subdivision entrance would be congested in the event of an emergency evacuation.

The term "private loop drive" in the Draft SEIR refers to the proposed project, not to the existing conditions. A loop drive would be constructed around the proposed senior assisted living facility.

Please refer to Topical Response D. The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein

concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project.

Please refer to Topical Response D for a discussion of queuing concerns at the Subdivision's entry gate. As noted therein, the project would increase inbound traffic at the gate by an estimated 16 percent. However, this increase in traffic would not substantially increase queuing. An additional westbound entrance lane at the gate would not be needed, and queuing vehicles would not obstruct vehicles from turning left onto Winding Creek Road. Therefore, the project would have a less than significant impact on traffic circulation related to queuing.

Response 113.5

The commenter states that the Subdivision meets the Toro Area Plan philosophy of "the essentially rural quality of life," and that this quality of life would be impacted by the project due to traffic, noise, and lighting.

Please refer to Topical Response C. As described therein, quality of life is not an environmental impact under CEQA. However, the Draft SEIR includes analysis of various impact areas such as noise and traffic that relate to quality of life.

Response 113.6

The commenter states that the developer claims there would be no significant natural disaster impacts on the project site, but dismisses impacts to the Subdivision. The commenter states that the project would increase the risk of mudslides and flooding in the Subdivision, because homes are located downhill from the project site.

Note that the project applicant is not the author of the Draft SEIR. The Draft SEIR was prepared by EMC Planning Group Inc. and the County of Monterey and reflects the independent judgement of the County.

Regarding mudslides and flooding, please refer to Topical Response E. As noted therein, the project includes on-site stormwater control measures designed to achieve zero net increase in the rate of stormwater discharge relative to pre-project conditions. This would reduce the potential for runoff from new development to exceed the capacity of storm drainage facilities and contribute to off-site flood hazards. Additionally, 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, including slope stability and landslides.

Response 113.7

The commenter states that a senior living center would be beneficial to the County, but should be built in a location that is closer to established infrastructure and medical care facilities, and somewhere that would not harm existing residents. The commenter states that the project would remove the attractive character of the area, cause turnover of residents, and result in crime.

Please refer to Topical Response A for a discussion of safety and security. As noted therein, the project would not result in a significant impact on police protection within the Subdivision.

Please refer to Topical Response C regarding the availability of services to the project site. As described therein, the proposed project would provide on-site medical care, and additional higher-level medical services are available at the Salinas Valley Memorial Hospital approximately five miles

northeast of the project site. The project would not require additional staffing or facilities to be required for police, fire, hospital, library, or other similar services.

Response 113.8

The commenter encourages the applicant to build residences on the project site, rather than the proposed senior living center.

The commenter's preference for an all-residential alternative is noted and herewith shared with the County's decision makers for their consideration.

Letter 114

From: Mary Koch
To: Sidor, Joe (Joseph) x5262
Cc: Swanson, Brandon xx5334; Onciano, Jacqueline x5193; Holm, Carl P. x5103; Roygobets@aol.com
Subject: RVPL Draft SEIR for proposed development of Riverview at Las Palmas (PLN#150372)
Date: Wednesday, April 25, 2018 11:59:08 PM

Dear Mr. Sidor,

I am writing to express my opposition to the proposed development, Riverview at Las Palmas. 114.1

I have attended LUAC meetings when this proposed project has been on the agenda and have voiced concerns regarding the shifting proposed plans, as well as the traffic impact of a nursing facility (emergency vehicles, staff, and visitors will be funneled into our subdivision with its stringent entry criteria, and will negatively impact the access of LP1 residents and their visitors). 114.2

As a twenty year resident of Las Palmas Ranch 1 HOA, during which time I have served on the HOA board (including as president), I have consistently heard stated by original board members that the LP1, LP2, & Parcel Q (the latter where RV@LP is proposed the be built) was approved for just over a total of 1,000 single family homes to be developed by Mike Fletcher. 114.3

LP1 consists of 329 homes; LP2 has 700 homes (including a small number originally planned to occupy Parcel Q), leaving one single family home to be built on Parcel Q.

Note Mr. and Mrs. Samuel Pershall, the previous owners of Chateau Coralini and Parcel Q, developed plans for a 10,000 sq. foot home, consistent with the one home permitted on Parcel Q, that would complement their bed and breakfast venue, offering additional housing for event guests.

I am a retired medical LCSW who has worked in hospitals with frail elderly patients, one segment of the patient population Mr. Shingu has proposed his facility will provide care for. Last Fall, multiple Oakmont nursing homes in the larger Oakmont single family home subdivision near Santa Rosa, experienced multiple problems evacuating their patients and patients were actually left behind. In the event of a wildfire threatening our neighborhood, the planned development's location on an exposed ridge on a dead end road seems extremely unsafe; I've participated in fire drills with ambulatory and non-ambulatory patients, and getting everyone out quickly and safely can be challenging, even under non-emergency conditions. Then once these patients are loaded @ Parcel Q, this traffic will be attempting to exit along with LP1 residents thru the guardhouse or gate, and then experience traffic from LP2, Indian Springs, etc. 114.4

I hope you will review this proposed development and deny the application. 114.5

Thank you,

Mary Koch
21400 Riverview Court

Letter 114

COMMENTER: Mary Koch

DATE: April 25, 2018

Response 114.1

The commenter states that they are opposed to the proposed project.

The commenter's opposition is noted and herewith shared with the County's decision makers for their consideration.

Response 114.2

The commenter states that they have previously expressed concerns about the project's traffic impacts and the project's "shifting proposed plans."

Sufficient detail is not provided for a response regarding "shifting proposed plans." Regarding traffic, please refer to Topical Response D. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

Response 114.3

The commenter states their understanding that the Las Palmas area is approved for approximately 1,000 homes. The commenter states that the Las Palmas I Subdivision consists of 329 homes, the Las Palmas II Subdivision consists of 700 homes, and only one home can be built on Parcel Q (the project site).

Regarding the residential unit cap of the LPRSP, refer to Topical Response C. As noted therein, the proposed project is not a residential use under the County code or LPRSP; as such, the residential unit limitation of 1,031 does not apply to the project.

Response 114.4

The commenter discusses the difficulties associated with evacuation of a senior assisted living facility.

The discussion pertaining to emergency access to the project site is discussed in Section 9.0, *Transportation & Traffic*, of the Draft SEIR. The analysis therein concludes that implementation of the project would not result in inadequate emergency access to the project site or to residences in the Las Palmas Ranch neighborhood, based on vehicle trip generation associated with the project. Refer also to Topical Response D.

Response 114.5

The commenter requests that the project be denied.

This commenter's request is noted and herewith shared with the County's decision makers for their consideration.

Letter 115

RECEIVED
APR 25 2018
Monterey County RMA

Joseph Sidor, Associate Planner
Monterey County RMA-Planning Second Floor
1441 Schilling Place, Salinas, CA 93901

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Dear Mr. Sidor,

Forty years ago my husband & myself moved to the Monterey Peninsula from the Bay Area (Contra Costa) to Pebble Beach, then Monterey.
We became very tired of the damp & fog. We found Las Palmas such a beautiful area for our retirement.

After writing several letters that just were not what I wanted to say about the Proposed Development of Riverview at Las Palmas (PLN#150372), I was able to see the letter written by Janet Barstad on April 5, 2018 address to you. I then realized I could not have written a better letter. Janet's letter speaks for myself in every way.
I have enclosed a copy of Janet's letter. 115.1

Please consider the above proposed development as totally changing our beautiful area that we all love & enjoy without the added traffic,etc. 115.2

Sincerely,

Roberta Pastorino

Letter 115

COMMENTER: Roberta Pastorino

DATE: April 25, 2018

Response 115.1

The commenter provides personal background information on their experience in the Subdivision. The commenter states that the April 5, 2018 letter by Janet Barstad summarizes their feelings.

The Janet Barstad letter is included herein as Letter 45. Refer to Response 45.1 through 45.5 for responses to this letter.

Response 115.2

The commenter states that the project would transform the area, and mentions traffic as a concern.

Regarding traffic impacts, refer to Topical Response D. As described therein, impacts related to traffic would be less than significant or less than significant with mitigation incorporated, with the exception of impacts to SR 68, which would be significant and unavoidable.

To: Sidorj@co.monterey.ca.us

Cc: Swansonb@co.monterey.ca.us
oncianoj@co.monterey.ca.us
holmcp@ co.monterey.ca.us
roygobets@aol.com

Letter 116

Subject: RVPL Draft SEIR for proposed Development of Riverview at Las Palmas (PLN#150372)

Hello Mr. Sidor,

I am very concerned about the proposed project. Its proposed use of Las Palmas 1 roads will pose unacceptable traffic, safety and security problems in our peaceful neighborhood. The gate already gets backed up daily with people checking in that do not live here and it will be totally crazy if this development happens. It will also add an extra safety issue to our neighborhood letting in 100's of more strangers that do not know anyone that lives in our neighborhood. It also poses a threat to our children as well as our kids who ride around on the their bikes and skateboards. I worry about who these people are and if they could kidnap or harm our children. We already have residents speeding and now you add more people it will only get worse. 116.1

Further, the scale and scope proposed for this development, coupled with its clear commercial use, are inconsistent with the residential atmosphere that Las Palmas residents chose when they located here in the first place. I moved here because it is a safe environment for my children and with the 100's of extra people going to that development would not have made me want to live here. 116.2

I respectfully urge the developer to find an alternate venue and access for his proposed facility on land where there are no neighborhoods that are affected with one entrance – it's just crazy to think this would ever work out. It is not in the best interest of the residents of LP1 for this development to take place – EVER! 116.3

Please respond to the issues I listed above in writing.

Respectfully,

Lisa and Anthony Silva
17594 Winding Creek Road
Salinas, CA 93908

Letter 116

COMMENTER: Lisa and Anthony Silva

DATE: April 26, 2018

Response 116.1

The commenter states that the project would pose traffic, safety, and security problems. The commenter states that the project would worsen the existing congestion at the Subdivision entrance. The commenter expresses concern that increased traffic could result in harm or kidnapping of children that live in the Subdivision.

Please refer to Topical Response A and Topical Response D for a discussion of the project's impacts related to traffic and safety. As described therein, the project would not substantially increase traffic within the Subdivision. As a residential Subdivision with motor vehicle traffic, traffic safety risks are an existing condition. Given the nominal addition of trips through the Subdivision, the project would not substantially exacerbate such risks. Further, as noted in Topical Response A, the project would not result in a significant impact on police protection within the Subdivision.

Response 116.2

The commenter states that the project is for a commercial use that is inconsistent with the Subdivision's residential atmosphere.

Please refer to Topical Response C for a discussion of land use compatibility. As described therein, the project would be consistent with the site's zoning and land use requirements.

Response 116.3

The commenter urges the applicant to find an alternate venue and access for the project.

As stated in Section 17.0, *Alternatives,* of the Draft SEIR, an alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in south Salinas, shopping, and regional roadway access.

The commenter's preference for an alternative site is noted and herewith shared with County decision makers for their consideration.

Letter 117

From: Roy Gobets
To: Sidor, Joe (Joseph) x5262
Cc: aemt5@aol.com; dalbyd345@gmail.com
Subject: Fwd: Additional Input re PLN 150372 - Riverview at Las Palmas
Date: Wednesday, August 15, 2018 7:40:49 AM

Joe,
I corrected two small typos below. Apologies.
Roy

Sent from my iPad

Begin forwarded message:

From: roygobets@aol.com
Date: August 14, 2018 at 8:31:06 PM PDT
To: sidorj@co.monterey.ca.us
Cc: aemt5@aol.com, dalbyd345@gmail.com
Subject: Additional Input re PLN 150372 - Riverview at Las Palmas

Reference: River View at Las Palmas - PLN 150372 - DSEIR Storm Water System Additional Information

Hello Joe,

It has been more than three months since I submitted earlier comments and new and important information has surfaced that I believe may have a bearing on the DSEIR review. Thank you for suggesting how I may submit additional comments on the subject DSEIR. I copied Tom Mercurio and David Dalby, LPI neighbors and contributors to this memo.

By way of context, as submitted in the subject DSEIR by the Applicant, there was no detailed plan evident to address the Storm Water load that would result from the project's 190,000 square feet of impermeable coverage (facilities, parking lots and roads, etc). I remarked on this in my original letter submitted during the Public Comment phase ending 4/25/2018. 117.1

Logically it appears that the developer may consider two options:

a) The developer may use ponds and a collection system on the development property (parcel Q), as other local developers have done. However the property has limited flat surface area to hold heavy winter rain run-off . Further the property slopes are steep and unstable particularly southward so any pond could pose a danger to LPI homes. Such an engineered solution will prove technically challenging and costly in view of multiple federal, state and county regulations. It may actually not even be feasible. 117.2

b) The developer may plan to contact the LPI HOA to address his need by connecting to the existing LPI HOA system. In anticipation of this likely event, several LPI residents were requested to research our almost 30 year old LPI system components, assess its operating status, and applicable policies.

This work was recently completed and presented to the LPI HOA Board on July 12. Summarizing this report: Our existing LPI Stormwater Removal system is an extensive combination of multiple holding ponds, street and fire access road drains, miles of

underground piping, and lift and pumping stations. In short, excess Storm Water is collected and channeled underground across River Road into the Salinas River. As such, it has already proved challenging to meet solely internal LPI needs during storms. It presently requires repairs and possibly upgrading. Clearly it is not adequate to absorb a new load as might be posed by RVLP

Recent Mud Slide: Las Palmas I experienced a painful event in February 2017. Our system was compromised by that winter's severe storms and rainfall. As a matter of record, Parcel Q runoff (i.e. the parcel the Applicant plans to build RVLP on) caused a mudslide of several hundred cubic yards of material consisting of "unconsolidated silt, sand and gravel eroded off the upland areas" that overwhelmed our adjacent Fire Access road drain and caused flooding that imperiled several nearby Las Palmas homes. Only heroic effort by Portola CDF firemen and neighbors averted homes flooding. My home is located within a few yards of this flooded area and it certainly got my attention.....

117.3

All of the lengthy, steep slopes of parcel Q must be considered similarly constructed and unstable. The Applicant was contacted by our HOA with a request to repair the Mud Slide area on their property. Much later in 2017 the developer repaired the damage and in doing so actually connected his newly installed hillside 8" drainage pipe network into the adjacent LPI access road drain.

We are not aware of any formal written request by the Applicant to our HOA to make this connection. Obviously this is of great concern to LPI home owners and in turn raised the new concern that the Applicant 's plan may be to turn to our HOA for a solution to his needs should the project be approved.

Permission: We investigated how such a future request might be considered. Our research shows LPI HOA Bylaws stipulate that any consideration of an easement (and such a connection by the developer, is essentially an easement) cannot be approved by the property manager nor the HOA Board itself.

117.4

The Bylaws specifically state that if the value of the assets for the easement exceeds 5% of the annual gross budgeted expenses, it must be put to an Association Membership vote. Clearly our substantial storm water infrastructure value exceeds the ~ 30K which is 5% of the 550K 2017 budgeted expenses.

Such a required vote would not carry, as our Association Membership is overwhelmingly opposed to the project. Prior surveys and votes demonstrate this opposition. I documented these data in my earlier letter. Consequently we now know that any attempt by the Applicant to negotiate a connection to our LPI Stormwater Removal system will fail. Hence option (b) above is a dead end.

The DSEIR as submitted does not specify any details on his "plan" to deal with runoff from the projected 190,000 square feet of impermeable covering.
So, how will the Applicant comply with California State law, General Plan, Las Palmas Specific Plan and other local plans and policies governing Storm Water Removal?

I look forward to your response to this important matter.

Best Regards,
Roy Gobets
Las Palmas I Homeowner since 1998

Best Regards,

Roy Gobets

Letter 117

COMMENTER: Roy Gobets

DATE: August 14, 2018

Response 117.1

The commenter states that the Draft SEIR does not include a plan to address the project's stormwater drainage needs.

Please refer to Topical Response E. As noted therein, the project includes on-site stormwater control measures designed to achieve zero net increase in the rate of stormwater discharge relative to pre-project conditions.

Response 117.2

The commenter states that collecting stormwater on-site with ponds would be problematic because there is limited surface area for storage, so stormwater may flood down the slope towards Subdivision homes. The commenter states that an alternative to on-site stormwater collection would be to connect to the Subdivision's drainage infrastructure, but that infrastructure is not adequate to handle an increase in volume.

Please refer to Topical Response E. As indicated therein, a Conceptual Stormwater Control Plan was prepared for the project by Gateway Engineering, Inc. and has been developed for the project as part of the preliminary design to address stormwater management for the project site in conformance with County and State regulatory requirements. The site drainage is specifically designed to meet County and regulatory requirements, and emulate pre-development conditions, resulting in the water volume, rate and quality of stormwater leaving the site would be similar to current conditions. As a result, there would be no project-related downstream or off-site impacts related to flood hazards or stormwater quality related to project operation.

Response 117.3

The commenter states that the project site is on an unstable slope that has previously caused a mudslide. The commenter states that the applicant has already connected the site to the Subdivision's drainage pipes without LPHOA approval.

Please refer to Topical Response E. As noted therein, 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, including slope stability and landslides.

Please refer to Topical Response I. As noted therein, a written agreement between the LPHOA and the applicant would be necessary in order to clarify cost-sharing and responsibilities associated with the streets that are under the control of the LPHOA. Such an agreement is not currently in place. It is outside of the scope of the Draft SEIR to facilitate an access agreement between the applicant and the LPHOA.

Response 117.4

The commenter states that connection to the Subdivision's stormwater drainage system would require a vote by the LPHOA members, and that the LPHOA would vote against such a measure. The commenter asks how the project would comply with stormwater drainage requirements without the right to connect to the Subdivision's drainage system.

Please refer to Topical Response E. As noted therein, 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, including slope stability and landslides.

Regarding a vote by LPHOA members, refer to Topical Response I. As noted therein, page 4-6 of the Draft SEIR has been revised to clarify that an agreement would be required between the LPHOA and the project applicants, who own the project site, to clarify cost-sharing and responsibilities . This includes connection to stormwater drainage facilities.

Received by RMA-Planning on September 14, 2018.

Letter 118

HAND delivered

RECEIVED
MONTEREY COUNTY
2018 SEP 13 PM 4:25
CLERK OF THE BOARD

Dear Supervisor Luis Ajelo,

Re: Senior Housing

About a year ago, I contacted your office, said I was "early." The project for senior housing, named [River View at Las Palmas] APN 139-211-035-000, 15+ acres, still has not progressed to the Planning Commission. 118.1

Staff says "Early 2019."

Meanwhile, at every income level, the need has increased.

Enclosed is a copy of my submission in the 45 day period EIR review for this project. (March - April 2017)

Please stay aware of this.

Nancy Dreenan

Letter 118

COMMENTER: Nancy Iversen

DATE: September 13, 2018

Response 118.1

The commenter states that since they had previously submitted comments on the project, and that since then, the need for senior housing has increased. The commenter notes that they are re-submitting their comment letter from March 10.

The commenter's additional comment on the need for senior housing is noted. Please refer to Letter 13 and Responses 13.1 through 13.4 for responses to the commenter's original comments.

4 Revisions to the Draft SEIR

The following pages provide a summary record of all proposed text revisions to the Draft SEIR. Most revisions are the result of comments received during the public review period, and directly respond to those comments. These revisions serve as clarifications and amplifications on the content of the Draft SEIR. None of the changes would warrant recirculation of the EIR pursuant to CEQA Guidelines section 15088.5. The revisions serve to clarify and strengthen the content of the EIR, but do not introduce significant new information.

Changes in text are signified by strikeouts (~~strikeouts~~) where text is removed and by underlined font (underline font) where text is added. Other minor clarifications and corrections to typographical errors are also shown as corrected in this format, including corrections not based on responses to comments.

4.1 Revisions to the Draft SEIR

Section 2.0 Summary

Page 2-2:

River View at Las Palmas Senior Living Community (the proposed project) is designed to provide a range of assisted care to seniors over the age of 55 and to persons with diminishing mental capacity due to Alzheimer's, dementia, or similar causes. The entire facility would be licensed by the State of California as a Residential Care Facility for the Elderly. The senior community would be comprised of three levels of residence, each with their own level of assistance: Casitas, Assisted Living Facility, and Memory Care Facility. There are 13 Casitas structures providing 26 separate units (referred to as A, B or C units) with a total of 42 beds. The assisted living facility is a two-level structure approximately 28 feet in height and will cover about 27,000 square feet. The assisted living facility includes 40 living units ranging from 360 to 587 square feet and a total of 52 beds. The memory care facility is a three-level structure approximately 30 feet in height and will cover about 21,600 square feet. The memory care facility includes 39 living units ranging from 313 to 453 square feet and a total of 48 beds. Total structural coverage is approximately 90,006 square feet (13.2 percent of the project site). Total site coverage (including roads, driveways, and parking areas) is approximately 190,000 square feet (27.8 percent of the project site). River Road provides the northern boundary of the property. There is no direct access from River Road and none is proposed. Access to the site is from the signalized intersection at River Road and Las Palmas Road to River Run Road, then Woodridge Court. River Road is a public road maintained by the County of Monterey. Additional details are provided in Section 4.0, *Project Description*.

Section 3.0 Environmental Setting

Table 3-1:

Full table included at the end of this section.

Section 4.0 Project Description

Page 4-6:

River Road provides the northern boundary of the property. There is no direct access from River Road and none is proposed. Access to the site is from the signalized intersection at River Road and Las Palmas Road to River Run Road, then Woodridge Court. River Road is a public road maintained by the County of Monterey. Las Palmas Road, River Run Road and Woodridge Court are private roads maintained by the Las Palmas Ranch Home Owners Association. Woodridge Court terminates at the entrance to the project site. Access to the proposed development will be by a private loop drive. The project applicants, who own the site, are currently members of the Las Palmas Ranch Home Owners Association and have paid dues to the association. The applicants will pay a proportionate share for the use of the roads and drainage system. An agreement would be required between the HOA and the project applicants, who own the project site, to clarify cost-sharing associated with use of the streets, drainage facilities, and security operations.

Page 4-18:

Conditional Use Permit and Design Review

The proposed project would require approval of a Conditional Use Permit from the County of Monterey. The proposed project will also be licensed by the State of California and subject to routine State inspections.

Specifically, the proposed project would require the granting of a Combined Development Permit consisting of: 1) Use Permit and Design Approval to allow the construction and operation of an approximately 90,000 square foot assisted senior living facility consisting of multiple structures and associated site improvements on an approximately 15.74-acre site; and 2) Use Permit to allow development on slopes exceeding 25 percent.

Section 6.0 Air Quality

Throughout Section 6.0:

~~MBUAPCD~~ MBARD

Page 6-1, paragraph 1:

This section of the EIR includes evaluation of proposed project impacts on air quality at a level commensurate with the project description. Unless otherwise noted, the discussion in this section is based upon independent site investigation, information found in the *2005 Report on Attainment of the California Fine Particulate Standard in the Monterey Bay Region - Senate Bill 656 Implementation Plan*, *Monterey Bay Air Resources District (MBARD, formerly known as Monterey Bay Unified Air Pollution Control District) 2012-2015 Air Quality Management Plan*, *Monterey Bay Unified Air Pollution Control District CEQA Air Quality Guidelines*, California Emissions Estimator Model results (Appendix C), *County of Monterey General Plan*, *Toro Area Plan*, and the *Las Palmas Ranch Specific Plan.*

Page 6-23, end of Mitigation Measure AQ-3:

- Whenever feasible, construction equipment shall use alternative fuels such as compressed natural gas, propane, electricity or biodiesel.

Section 7.0 Biological Resources

Page 7-11, Table 7.2 Special-Status Wildlife Species with Potential to Occur in Vicinity, column 4 (Potential to Occur on Project Site), row 7 (California tiger salamander):

~~Not expected. No suitable habitat found on the site.~~ Low. High quality, but mostly isolated habitat is present on site, and suitable breeding habitat is present within 1.24 miles of project site.

Page 7-15, the first paragraph is deleted and replaced in its entirety with the language presented below:

~~The project site does not contain habitat suitable for California tiger salamander breeding. CDFW records indicate that there are no known occurrences of California tiger salamander within 2.5 miles of the site. There are no ponds or wetted areas on the site. The ditch that runs along the eastern edge of the property is outside the project boundary and did not support standing water at the time of the survey, even after extremely heavy rains this season (winter 2015-2016). The ditch also appears to be sprayed with herbicides, as vegetation observed in this area was yellow, in contrast to surrounding vegetation. There were very few California ground squirrel burrows observed in the grassland areas, and California tiger salamander is not expected to utilize the site for upland refuge habitat.~~

The site is located approximately two miles from the closest known California Natural Diversity Database (CNDDB) occurrence of CTS at Toro Regional Park. The site is also within 1.24 miles (i.e., the known CTS dispersal distance) of stock ponds, detention basins, the Salinas River, and other wetlands visible on aerial imagery that represent areas with suitable breeding habitat. Based on a site visit and review of aerial imagery, the habitat on-site does not include suitable breeding habitat but may provide upland habitat in ground squirrel and small mammal burrows. Connectivity for movement between known populations and potential breeding habitat in the area and the project site itself is feasible where natural habitat or landscaped areas allow for undisrupted movement. A potentially suitable stock pond was located approximately 0.33 mile west of the site but was converted to agriculture between late 2017 and early 2018. This pond was evaluated for the adjacent Ferrini Ranch Project and was determined not to provide suitable breeding habitat due to an insufficient hydro-period and shallow basin (Ferrini Ranch Subdivision EIR 2014). However, the assessment in the Ferrini Ranch Subdivision EIR was made during a period of regional drought. A review of Google Earth imagery from 2016 showed that the pond held water through April 2016, indicating a sufficient hydro-period to support breeding. Higher quality and more easily accessible habitat is present outside of the project site. CTS cannot be completely excluded from having a potential to occur at the project site; however, the site is bordered by development and agriculture on three sides, and the potential for CTS to occur on site is low.

Page 7-15, third paragraph:

~~The project site does not contain habitat suitable for California red-legged frog breeding. CDFW records indicate that there are no known occurrences of California red-legged frog within 2.5 miles of the site. As described above, there are no ponds or wetted areas on the site. There are very few California ground squirrel burrows observed in the grassland areas, and California red-legged frog is not expected to utilize the site for upland refuge habitat.~~

The closest reported occurrence of CRLF is approximately 5.1 miles to the south of the site, on the south side of Toro Regional Park. This occurrence was reported from a stock pond along

Corral Del Cielo Road. Other occurrences in the vicinity are similarly from stock ponds. No creeks provide connectivity between the project site and any known occupied habitat. As such, it is unlikely that CRLF would disperse to the site from known stock pond occurrences in the south, and protocol level surveys of Toro Creek to the south performed for the Ferrini Ranch project were negative. CRLF have also been reported from the Salinas River approximately 8.6 miles downstream of the site, where adults and juveniles were observed. American bullfrog and non-native predatory fish are also known to occur in the Salinas River and reduce the habitat suitability in that water body for CRLF. Agricultural fields and busy roads lay between the river and the site posing significant biogeographic barriers and reducing the likelihood for dispersal from distant known occurrences to the project site. Therefore, CRLF are not expected to occur on-site.

Page 7-23, under the subheading "Tree Removal" is revised as follows:

The proposed project does not include the removal of trees protected by the Monterey County Municipal Code, Chapter 16.60 – Preservation of Oak Trees and Other Protected Trees within the Toro Plan area. Eucalyptus trees proposed for removal on the project site are not native and therefore, are not protected by the county. Additionally, eucalyptus trees represent a significant fire hazard, and the removal of such trees is supported by the local fire district.

Page 7-28 immediately preceding "IMPACT Impede Movement of Common Wildlife" as follows:

IMPACT Potential Loss or Disturbance of California Tiger Salamander

If California tiger salamander is present on the project site, construction activities could result in the loss or disturbance of individual animals. This would be a significant adverse environmental impact. Implementation of the following mitigation measure would reduce the potential impact to a less-than-significant level.

BIO– 6 California Tiger Salamander Surveys, Avoidance and Minimization

Prior to the start of construction, a qualified CTS biologist shall conduct a preconstruction survey for CTS. The survey shall include a transect survey over the entire project disturbance footprint (including access and staging areas), and scoping of burrows for CTS occupancy. If CTS are documented on the surface or in burrows, no work can be conducted until the individuals leave the site of their own accord. If no CTS are found, the biologist shall collapse all small mammal burrows onsite within the disturbance footprint. After all burrows have been collapsed, a silt fence shall immediately be installed around the edges of the work area to the existing road. This fencing shall be buried to at least three inches. No equipment or disturbance shall be allowed outside of the silt fence, and fencing shall remain in place until the project is complete. If a California tiger salamander is observed at any time during burrow excavation or construction, all work shall cease, and the applicant shall contact the USFWS for guidance before commencing project activities.

Section 9.0 Transportation & Traffic

Page 9-22:

The entrance gate to the Subdivision is currently served by a security guard. Subdivision residents have windshield tags on their vehicles, which allow entrance without having to stop at the security gate (Higgins 2019). Visitors and commercial vehicles are required to stop and be

recorded in the daily log, which in turn stops all entering vehicles while the information is being recorded because there is only a single entrance lane. The gate is not served by a security guard during the afternoon rush hour, which has the highest inbound traffic flow, in order to avoid occasional queues that would extend from the gate house to River Road.

Vehicle trips generated by the project would increase the existing volume of inbound traffic at the gate by an estimated 16 percent (Higgins 2019). Las Palmas Road has enough capacity to accommodate these additional trips without resulting in substantial queuing in front of the gate, or in blockage of vehicles turning into or out from Winding Creek Road. As a condition of approval of the project, the County also would require employees at the senior living center to display windshield tags. This condition of approval would eliminate the need to check each employee's vehicle, reducing the length of queues at the gate. Further measures to reduce queuing, including the installation of an automatic gate or the addition of a second inbound lane at the gate, would not be necessary. Therefore, the project would have a less than significant impact on traffic circulation related to queuing at the Subdivision's gate.

Page 9-23:

Emergency Access

~~The project's traffic impact assessment concluded that vehicle trip generation associated with the proposed project would be accommodated by the existing neighborhood roadway system. Therefore, implementation of the proposed project would not result in inadequate emergency access to the project site itself, or to residences in the Las Palmas Ranch neighborhood.~~

The project would involve extending Woodridge Court at a grade of approximately 15 percent to provide primary vehicular access to the project site. This grade is within the County's requirements for the Las Palmas Specific Plan and for the County in general. Therefore, the grade of site access would not create a safety hazard for emergency vehicle responding to service requests at the senior assisted living community.

Secondary access between River Road and the project site during emergency evacuations would be available through the lawn area between County Park Road and Woodridge Court. In addition, the project's interior loop street system would facilitate emergency access in more than one direction on-site. However, secondary access would not be provided on Woodridge Court between Country Park Road and the first internal parking lot aisle. To provide for additional capacity on this road segment in an emergency evacuation, turnouts on exiting and entering lanes should be provided. In addition, an all-weather surface should be provided on the lawn area between Country Park Road and Woodridge Court should be provided to facilitate emergency access. Therefore, this impact would be potentially significant without mitigation.

Mitigation Measure TRA-3 Emergency Access Improvements. Prior to occupancy of the proposed senior assisted living community, the applicant shall install eight-foot turnouts on the entering and exiting lanes of the proposed extension of Woodridge Court between Country Park Road and the first internal parking lot aisle on the project site. Also, prior to occupancy, the applicant shall install grass grid pavers on the section of lawn area between Woodridge Court and Country Park Road to provide an all-weather surface for secondary access.

Implementation of Mitigation Measure TRA-3 would involve ground disturbance to install turnouts and grass grid pavers, which could have secondary effects on unanticipated subsurface

cultural resources and water quality. However, as discussed on page 11-1 of the Draft SEIR, the applicant would apply comprehensive measures in the 2010 Monterey County General Plan to avoid and minimize impacts on archaeological resources and human remains. As discussed on page 11-6 of the Draft SEIR, compliance with stormwater permitting requirements would prevent erosion or degradation of water quality from construction activities. Therefore, the secondary environmental impacts of Mitigation Measure TRA-3 would be less than significant.

With implementation of Mitigation Measure TRA-3, the applicant would improve the capacity for and safety of emergency access routes to the project site. As a result, the proposed project would not cause inadequate emergency access to the project site itself, or to residences in the Las Palmas Ranch neighborhood. This impact would be less than significant with mitigation.

Page 9-23, "Applicant Proposed Mitigation Measures" bullet number 2:

To reduce overall trip generation to and from the project site, the project developer shall prepare a detailed plan for shuttle service. Shuttle services shall be offered to residents to access areas on the Monterey Peninsula and in Salinas from the project site. Additionally, shuttle service to nearby transportation hubs for employees shall be offered in the shuttle service plan. If feasible, the shuttle fleet shall be electrically-powered, and electric vehicle (EV) infrastructure should be added to the project for both shuttle and visitor use. The shuttle service plan shall be submitted for review and approval to Monterey County prior to approval of any building permits on the project site.

Page 9-24, impacts to residential streets:

During construction of the project, truck trips routed through the Subdivision could contribute to deterioration of private residential streets maintained through homeowners' association fees. However, as a standard grading and building permit condition, the County would require that the project applicant be responsible for repairing any damage to existing infrastructure during the temporary construction activities. This would include repairing pavements and special pavement surface treatments, as needed. Adherence to this condition of approval would prevent long-term deterioration of the circulation system from construction activity.

During operation of the project, the addition of vehicle trips, especially truck trips to serve the senior assisted living community, could incrementally contribute to deterioration of Subdivision streets. To offset this effect, payment of a fair-share contribution toward ongoing maintenance of private streets would be necessary. As a condition of approval, the County would require that the applicant pay a fair-share contribution toward ongoing maintenance of private streets maintained by the homeowners' association in the Subdivision. The fair-share contribution would be proportionate to the effect of project-generated vehicle trips on deterioration of privately maintained streets, relative to the effect of other residential traffic in the Subdivision.

With implementation of this condition, the applicant would make a fair-share contribution to repairing long-term damage to privately maintained streets in the Subdivision. Therefore, the project would have a less than significant impact related to deterioration of the circulation system.

Page 9-24, cumulative impacts:

As shown in Figure 9-4, the Cumulative + Project traffic scenario would degrade traffic conditions at two signalized intersections to below the County's threshold of LOS C. In this traffic scenario, the Reservation Road/State Route 68 westbound ramps intersection would

operate a LOS D during PM peak hours, as would the River Road/State Route 68 eastbound ramps during AM peak hours. Under existing conditions, these intersections operate at acceptable LOS C conditions. To offset a contribution to unacceptable cumulative traffic conditions at these intersections, the applicant would be required to pay impact fees toward future traffic improvements.

The Transportation Agency for Monterey County (TAMC) and its member jurisdictions have adopted a county-wide, regional development impact fee to cover the costs for studies and construction of many roadway improvements throughout Monterey County. This impact fee, which went into effect on August 27, 2008, is applied to new development within Monterey County. The governing document for the fee is the Regional Impact Fee Nexus Study Update (March 26, 2008) prepared by Kimley-Horn Associates, Inc. The Regional Impact Fee Nexus Study Update was updated in October 2018 by Wood Rodgers. Payment of the TAMC fee would satisfy the project's fair-share contribution to cumulative impact mitigation throughout the regional highway system, even for locations where an improvement has not been included in the fee program. In addition, the applicant would be required to pay a County fee for traffic impacts, which could include a pro-rata share of improvements at the River Road-Reservation Road /Highway 68 ramps intersections.

By paying required TAMC and County traffic impact fees, the project would not considerably contribute to a significant cumulative traffic impact.

Section 10.0 Water Supply

Page 10-10:

Monterey County General Plan

The Monterey County General Plan Land Use Element and Public Services Element provide the following goals, policies and objectives pertaining to water supply and distribution applicable to this project. Land Use Element goals LU-1 and LU-2 aim to concentrate development in areas where suitable access to services and facilities such as water and sewer.

Public Services Element policies PS-3.1, PS-3.2 and PS-3.3 address water supply and provide as follows:

PS-3.1 Except as specifically set forth below, new development for which a discretionary permit is required, and that will use or require the use of water, shall be prohibited without proof, based on specific findings and supported by evidence, that there is a long-term, sustainable water supply, both in quality and quantity to serve the development.

This requirement shall not apply to:

a. The first single family dwelling and non-habitable accessory uses on an existing lot of record; or

b. Specified development (a list to be developed by ordinance) designed to provide: a) public infrastructure or b) private infrastructure that provides critical or necessary services to the public, and that will have a minor or insubstantial net use of water (e.g. water facilities, wastewater treatment facilities, road construction projects, recycling or solid waste transfer facilities; or

c. Development within Zone 2C of the Salinas Valley groundwater basin, provided the County prepares or causes to be prepared a study for the Board of Supervisors regarding Zone 2C, to be completed no earlier than October 31, 2017 and no later than March 31, 2018 that does the following:

   1) Evaluates existing data for seawater intrusion and groundwater levels collected by Monterey County Water Resources Agency as of the date the study is commenced.

   2) Evaluates the total water demand for all existing uses and future uses designated in the General Plan EIR for the year 2030;

   3) Assesses and provides conclusions regarding the degree to which the total water demand for all uses designated in the General Plan for the year 2030 are likely to be reached or exceeded;

   4) Evaluates on an annual basis during the study period groundwater elevations and the seawater intrusion boundary;

   5) Based on historical data and the data produced by the study, evaluates and provides conclusions regarding future trends and any expected movement of groundwater elevations and the seawater intrusion boundary;

   6) Should the study conclude that i) total water demand for all uses designated in the General Plan for the year 2030 is likely to be exceeded; or ii) groundwater elevations are likely to decline by the year 2030 and iii) the seawater intrusion boundary is likely to advance inland by the year 2030, the study shall make recommendations on measures the County could take to address any or all of those conditions; and

   7) Addresses such other matters as the Board of Supervisors determines are appropriate.

Within two months following the completion of the study, the Board of Supervisors shall hold an open and noticed public hearing on the results of the study. If the study reaches the conclusions for Zone 2C identified in subsection 6) i or 6) ii and 6) iii, the Board of Supervisors shall adopt one or more measures identified in the study, or other appropriate measures, to address the identified conditions. This exception for Zone 2C shall be a rebuttable presumption that a Long Term Sustainable Water Supply exists within Zone 2C, and the presumption shall remain in effect until and unless the study reaches the conclusion for Zone 2C identified in subsection 6) i or 6) ii and 6) iii. Development in Zone 2C shall be subject to all other policies of the General Plan and applicable Area Plan.

Following completion of the study described herein, and the adoption of measures as may be recommended in the study, if any, the County shall prepare a report to the Board of Supervisors every five (5) years for Zone 2C that examines the degree to which a) total water demand for all uses predicted in the General Plan EIR for year 2030 will be reached; or b) groundwater elevations, the seawater intrusion boundary have changed since the prior reporting period; and c) other sources of water supply are available.

PS-3.2 Specific criteria shall be developed by ordinance for use in the evaluation and approval of adequacy of all domestic wells. The following factors shall be used in developing criteria for both water quality and quantity including, but not limited to:

a. Water quality;
b. Authorized production capacity of a facility operating pursuant to a permit from a regulatory agency, production capability, and any adverse effect on the economic extraction of water or other effect on wells in the immediate vicinity, including recovery rates;
c. Technical, managerial, and financial capability of the water purveyor or water system operator;
d. The source of the water supply and the nature of the right(s) to water from the source;
e. Cumulative impacts of existing and projected future demand for water from the source, and the ability to reverse trends contributing to an overdraft condition or otherwise affecting supply; and
f. Effects of additional extraction or diversion of water on the environment including on in-stream flows necessary to support riparian vegetation, wetlands, fish or other aquatic life, and the migration potential for steelhead, for the purpose of minimizing impacts on the environment and to those resources and species.
g. Completion and operation of new projects, or implementation of best practices to renew or sustain aquifer or basin functions.
h. The hauling of water shall not be a factor nor a criterion for the proof of a long-term sustainable water supply.

PS-3.3 Specific criteria shall be developed by ordinance for use in the evaluation and approval of adequacy of all domestic wells. The following factors shall be used in developing criteria for both water quality and quantity including, but not limited to:

a. Water quality.
b. Production capability.
c. Recovery rates.
d. Effect on wells in the immediate vicinity as required by the Monterey County Water Resources Agency or Environmental Health Bureau.
e. Existing groundwater conditions.
f. Technical, managerial, and financial capability of the water purveyor of a water system.
g. Effects of additional extraction or diversion of water on in-stream flows necessary to support riparian vegetation, wetlands, fish or other aquatic life, and the migration potential for steelhead, for the purpose of minimizing impacts on the environment and to those resources and species.

Page 10-13, first paragraph:

Monterey County General Plan

Policy PS-3.1. The first component of policy PS-3.1 is the requirement *to provide proof of a sustainable water supply to serve the development*. Policy PS-3.1 includes an exception to

development in Zone 2C of the Salinas Valley groundwater basin, which would include the proposed project. Instead the provisions of subsection c. of the policy are applicable. Subsection c. requires the County to conduct a specific study on Zone 2C, conduct a hearing on the study results, adopt measures to address identified conditions, and prepare a report every 5 years on the results of any measures. The requisite study and related actions have not been conducted.

Subsection c. further provides, "This exception for Zone 2C shall be a rebuttable presumption that a Long Term Sustainable Water Supply exists within Zone 2C, and the presumption shall remain in effect until and unless the study reaches the conclusion for Zone 2C identified in subsection 6) i or 6) ii and 6) iii. Development in Zone 2C shall be subject to all other policies of the General Plan and applicable Area Plan. Based on these considerations, the project is consistent with Policy PS-3.1, and the availability of a long-term water supply will be further discussed in conjunction with other policies below.

Policy PS-3.2. This policy provides guidance and criteria for the development of a County ordinance outlining the requirements for proof of a long term sustainable water supply and an adequate water supply system for new development requiring a discretionary permit. Thus, this policy is relevant to development of an ordinance that could be applied to the proposed.

Nonetheless, this project is reviewed below applying these criteria:

- Water is the same quality as current local California Water Service wells and is thus, of acceptable water quality.
- The analysis in the Draft SEIR (Section 10.0, *Water Supply*, page 10-11) shows that the project would use 11.4 acre-feet of water per year (AFY), approved Specific Plan anticipated uses associated with 599-AFY, and is using only 182 AFY. With consideration of the proposed project, total water use in the entire Specific Plan Area would be 194 AFY. In addition, common area landscape irrigation would use recycled water, resulting in less than 11.4 AFY of potable water demand. The project water would demand represents a 0.002 percent increase in the annual groundwater extraction for Zone 2C. California Water Service has confirmed that it can and will serve the project, which indicates the applicable water purveyor for the site is able to provide water supply for the proposed project. See updated will-serve letter from California Water Service dated March 26, 2019 in Appendix I-2
- California Water Service has demonstrated its technical, managerial and financial capabilities to deliver water.
- Potable water would be provided by California Water Service via its entitlements detailed in the Draft SEIR (Section 10.0, *Water Supply*, page 10-1). In addition, the property has rights to 2.5 acre-feet of reclaimed water which would further offset demand on potable water.
- As indicated in the Draft SEIR (Section 10.0, *Water Supply*, pp. 10-11 to 10-12), the project would increase potable water demand by up to 11.4 AFY. The "can and will" service letter provided by California Water Service for the proposed project indicates the applicable water purveyor for the site is able to provide water supply for the proposed project based on its existing facilities.
- The project does not involve any extraction or diversion of water but would utilize California Water Service water and recycled water associated with existing entitlements. In addition, the project would utilize water efficiency methods including water efficient fixtures, low-water use landscaping, and principles of low impact development in design to manage stormwater and emulate pre-development hydrologic conditions.

- The project would not adversely affect aquifer or basin functions and would not hinder other efforts to renew aquifer or basin functions.
- The project would not involve any hauling of water.

Therefore, substantial evidence related to proof of a sustainable water supply for the project includes the analysis and references in the Draft SEIR, including Section 10.0, *Water Supply,* the Cal Water will-serve letter include in Draft SEIR Appendix E, the updated will-serve letter attached herein (see Appendix I-2), the previous EIR for the Plan Area, and discussion and analysis in this response to comments/Final SEIR. The project is consistent with Policy PS-3.2.

Policy PS-3.3. This policy provides criteria for the evaluation of development of new domestic wells. The project does not involve any well development. Therefore, PS-3.3 would not be applicable.

Page 10-13, "Groundwater Impacts" subsection:

MCWRA is a regional leader in the area for groundwater management efforts to reduce overdraft and increase the reliability of the water supply. Cal Water is supportive of these efforts and prepared to work with MCWRA and make necessary investments to augment future basin recharge. Relevant efforts are highlighted below.

- **Salinas Valley Water Project**. The Salinas Valley Water Project aims to address both overdraft and related sea water intrusion into the aquifer. Reservoirs were previously constructed to capture excess storm flow on the upper reaches of the Salinas River and its tributaries and recharge this water in the upper valley and Forebay sub-areas of the Salinas Valley. Monitoring and study of conditions is ongoing, along with evaluation of additional solutions to improve conditions.
- **Conservation Master Plan**. Cal Water has an aggressive conservation program that has and will continue to reduce per-capita usage via demand management measures. Cal Water has a variety of programs to help its customers use water efficiently and conducts comprehensive program and analysis in a 5-year cycle in conjunction with the Urban Water Management Plan. Demand management measures include water waste prevention ordinances, metering, public education and outreach, distribution system water loss management, water conservation program coordination, water efficiency rebate, giveaway and installation programs, among other efforts.
- **Greater Monterey County Integrated Regional Water Management Program**. Cal Water monitors and supports the goals of this plan, which include improving water supply reliability, protecting groundwater and surface water supplies, and promoting regional communication, cooperation and education regarding water resource managements.

Based on the above, and other considerations addressed in its Urban Water Management Plan, California Water Service projected that, under all hydrologic conditions, its groundwater supply for the Salinas District will fully meet future demands through 2040 (2016 California Water Service).

As presented earlier in the groundwater setting of this section, the average annual groundwater extraction for the four noted subareas that compose Zone 2C was about 523,000 AFY from 1959 to 2013. The proposed project would add 11.376 acre feet per year, which is a 0.002 percent increase. This contribution to the cumulative existing impact is not considerable, and therefore, is a less-than-significant impact.

Water Conservation Measures

Similar to existing users, the project would employ strict water conservation measures in construction, design and operation and maintain responsible use of water. Specific measures to be included are discussed further below.

Project design and development would be subject to the most current requirements of the County and the State which include provisions for water efficiency, including California Building Standards Code and the California Green Building Standards Code (CALGreen). The project would also be subject to County Ordinance No. 3932[1] regarding mandatory water conservation regulations which governs design and development, as well as the operation and use of water.

Water conservation design measures to be implemented in conjunction with the proposed project include the following conditions of approval:

- Use of non-potable water for common area landscaping
- Use of xeriscape and low-water use landscaping to be utilized. The project shall use vegetation that uses little to no water once established. No turf will be used.
- Water efficient fixtures:
  - Ultra-low-flow toilets (maximum 1.6 gallons)
  - Shower heads (maximum 2.5 gallons/minute)
  - Recirculating hot water systems where fixtures are more than 10-feet from source
- Implementation of low impact development (LID) principles in hydrologic and water quality design. Low impact development techniques enable water to infiltrate into the soil on-site, rather than runoff. Benefits of LID include reducing stormwater runoff, erosion, and downstream impacts of flooding and/or water pollution, recharge of water into the groundwater, filter of pollutants from water prior to metered release. Project development will incorporate these methods to promote recharge, reduce runoff, and filter water to emulate pre-development conditions.

In addition, the project would be required to comply with the operational provisions of Ordinance No. 3932, including:

- Immediately repair of water leaks including irrigation, pipes, faucets and fixtures
- Wash vehicles at a commercial washing facility or equip hoses with automatic shutoff nozzles or low volume/high pressure system
- Equip hoses used to clean exterior of structures with shut-off valves or low volume/high pressure system
- Prohibit use of potable water to clean sidewalks, driveways, roads, parking and other paved or hard surfaces, except to protect public health or safety
- Prohibit water to spill into streets, curbs, or gutters, which exceeds reasonable beneficial use
- Post water-conservation oriented placards in appropriate locations (bathrooms, kitchens, water faucets, etc.) to highlight conservation practices to residents, employees and visitors

[1] 1997 Monterey County Water Resources Agency. Ordinance No. 3932 *An Ordinance of the Monterey County Water Resources Agency Amending Ordinances Nos. 3539 and 3596 and enacting mandatory water conservation regulations*.

- Provide literature to residents and employees describing the water conservation requirements of the facility

The project would also implement the following measures as conditions of approval during construction:

- If needed for dust suppression only recycled water would be used
- Soil shall be immediately stabilized following construction via erosion control measures and establishing of drought tolerant vegetation

Project Wastewater

The region has seen an overall demand in wastewater as users seek alternatives to potable water for irrigation of landscaping, golf courses, and other recreation facilities. Wastewater from the project site would be collected and treated at Las Palmas Ranch Wastewater Treatment Facility operated by California American Water Company. The wastewater would be recycled and used for irrigation.

Page 10-13:

The MCWRA's Recommendations to Address the Expansion of Seawater Intrusion in the Salinas Valley Groundwater Basin (2017) provides a discussion of the current knowledge and related background information surrounding seawater intrusion pathways and potential impacts thereof on the Salinas Valley Groundwater Basin. Six specific recommendations are included in the report with the objective of having the strongest potential to ensure success in slowing or halting father seawater intrusion when implemented simultaneously. The report also indicates each recommendation can be implemented on its own.

The recommendations from the report are as follows:

1. An immediate moratorium on groundwater extractions from new wells[2] in the Pressure 400-Foot Aquifer[3] within an identified Area of Impact[4], except for the following use categories:
   a. Wells operating under the auspices of the Castroville Seawater Intrusion Project; and,
   b. Monitoring wells owned and maintained by the Agency or other water management agencies.
2. Enhancement and expansion of the Castroville Seawater Intrusion Project (CSIP) Service Area. The expansion should include, at a minimum, lands served by wells currently extracting groundwater within the Area of Impact.
3. Following expansion of the CSIP Service Area, termination of all pumping from existing wells Pressure 180-Foot or Pressure 400-Foot Aquifer wells within the Area of Impact, except for the following use categories:

[2] "New well" is not intended to include (a) any well for which a construction permit has been issued by the Monterey County Health Department or (b) any well for which drilling or construction activities have commenced in accordance with a well construction permit issued by the Monterey County Health Department.
[3] Aquifer means: a water-bearing or saturated formation that is capable of serving as a groundwater reservoir supplying enough water to satisfy a particular demand, as in a body of rock that is sufficiently permeable to conduct groundwater and to yield economically significant quantities of water to wells and springs (Poehls and Smith, 2009).
[4] See Section 1.5 of the report for a description of the Area of Impact. The Area of Impact is also depicted in Figure 4.

a. Municipal water supply wells;

b. Wells operating under the auspices of the Castroville Seawater Intrusion Project; and,

c. Monitoring wells owned and maintained by the Agency or other water management agencies.

4. Initiate and diligently proceed with destruction of wells in Agency Zone 2B, in accordance with Agency Ordinance No. 3790, to protect the Salinas Valley Groundwater Basin against further seawater intrusion.

5. An immediate moratorium on groundwater extractions from new wells within the entirety of the Deep Aquifers of the 180/400 Foot Aquifer and Monterey Subbasins until such time as an investigation of the Deep Aquifers is completed and data pertaining to the hydraulic properties and long-term viability of the Deep Aquifers are available for knowledge-based water resource planning and decision making.

   a. Monitoring wells, public agency wells, municipal water supply wells, wells for which a construction permit has already been issued, and well repairs should be considered for exemption from this recommendation.

   b. The moratorium should include a prohibition of:

      i. Replacement wells, unless it can be demonstrated that the installation of such a well will not result in further expansion of the seawater intrusion front; and,

      ii. Deepening of wells from overlying aquifers into the Deep Aquifers, deepening of wells within the Deep Aquifers, and other activities that would expand the length, depth, or capacity of an existing well.

   6. Initiate and diligently proceed with an investigation to determine the hydraulic properties and long-term viability of the Deep Aquifers.

Section 11.0 Effects Not Found to be Significant

Page 11-1:

The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, or timberland. The Monterey County General Plan identifies the property as Grazing Land. The project site has been lightly grazed over the years, but only as part of a much larger grazing operation on adjoining properties. The project site is not of a sufficient size to be considered a viable agricultural unit for anything other than grazing. ~~The project will not have an impact on existing or adjoining agricultural uses, or result in the loss or conversion of forest land to non-forest use.~~

The nearest crops to the project site are at a distance of approximately 330 feet, across River Road. Property adjacent to the west is used for cattle grazing. Development adjacent to farmland can create conflicts with agricultural operations in adjacent areas. The increase in the number of residents in the area would increase public access near existing agricultural areas, increasing the potential for conflicts, such as vandalism to farm equipment or fencing, and theft of crops. These effects can result in direct economic impacts to agricultural operations, potentially impacting the overall economic viability of continued agricultural operations. In addition, residents living adjacent to agricultural operations commonly cite odor nuisance impacts, noise from farm equipment, dust, and pesticide spraying as typical sources of conflict.

The distance and landscaping buffer between the project site and the adjacent agricultural operations would minimize conflicts between the land uses. Specifically, mature trees would remain along River Road to buffer the project site against the effects of nearby agriculture such as pesticides and odors. Landscape buffering and topography would also minimize potential conflicts between the project and the surrounding grazing land. In addition, the County ensures a "right to farm" through Chapter 16.40, *Protection of Agricultural Activities*, of the Monterey County Municipal Code. Therein, an agricultural operation that is considered to be "properly operated" is inherently defined as a non-nuisance, and any transfer of real property within the County includes a "right to farm" notice provided to the purchaser. Therefore, the proposed project would not infringe on the farming rights of nearby agricultural operations, nor result in conversion or loss of farmland. The project would have a less than significant impact on agricultural or forest resources.

Page 11-2:

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. Building within this area would be adequate to reduce the impact because, as determined by Landset Engineering, Inc., the area within the geologically suitable building envelope is less steep than the steep slopes on the north and south flanks of the site, and more geologically stable. As displayed in Figure 11-1, Project Site Slopes, a portion of the project site proposed for development is located in an area of slopes greater than 25%.

As a condition of approval, all recommendations included in the geotechnical report would be implemented in the design and construction of the project. These recommendations include, but are not limited to: building within the geologically suitable building envelope to ensure that future building foundations are built on the most stable part of the site that would expose neither those nor other structures to harm from landsliding and slope instability; having the project geologist review final site grading and improvement plans prior to construction and site grading during earthwork to properly account for and, if necessary, adjust to actual conditions found during grading; requiring that on-site soils are inspected by a soil engineer prior to any site clearing or grading to ensure the internal consistency and stability of on-site soils; measures to ensure stability of existing on-site soils during and after site preparation and grading; and measures to ensure stability of foundations, footings, pile and grade beam foundations, retaining walls, and utility trenches.

In addition, the applicant would be required to comply with applicable building codes and standard County conditions of approval relating to slope stability and stormwater drainage. For example, the applicant would be required to comply with Monterey County Code Chapter 16.08, Grading, which prohibits the issuance of grading permits for projects that would be hazardous by reason of flood, geological hazard, seismic hazard, or unstable soil; and Monterey County Ordinance Code, specifically Chapter 16.12, which requires an erosion control plan prior to permit issuance for building, grading, or land clearing.

Compliance with recommendations in the geotechnical report, which would be required as a condition of project approval, and compliance with applicable County code requirement would ~~to~~ ensure that there would be no significant impacts associated with geologic hazards.

Page 11-5:

According to the Monterey County General Plan, the project site is ~~not~~ located in a moderate to high ~~or very high~~ fire hazard area. Fire protection to the project site would be provide by the Monterey County Regional Fire District, which as mutual aid agreements with neighboring fire departments and CAL FIRE for additional support in the event of wildfires.

Page 11-6 in Section 11.6, *Surface Hydrology*:

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. A Conceptual Stormwater Control Plan was developed for the project as part of the preliminary design to address stormwater management for the project site in conformance with County and State regulatory requirements. The plan illustrates the location of impervious and pervious areas, storm flow direction and storm water control facilities.

The project would introduce new impervious surfaces in the form of building rooftops, and paved drives, parking areas and walkways. A large proportion of the site would remain impervious and feature landscaping to promote groundwater infiltration and uptake. The project site would also feature three bioretention areas where stormwater would be captured and filtered prior to infiltration or metered release to a connecting storm drain. Grading and contouring on the project site would collect and direct flows into one of these three basins.

~~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 site drainage is specifically designed to meet County and regulatory requirements, and emulate pre-development conditions, resulting in the water volume, rate and quality of stormwater leaving the site would be similar to current conditions.

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. As a result, there would be no project-related downstream or off-site impacts related to flood hazards or stormwater quality related to project operation.

Page 11-7, Section 11.8:

To quantify existing noise levels on and near the project site, one 24-hour noise measurement and four short-term noise measurements were taken using an ANSI Type II integrating sound level meter. Figure 11-2 shows the locations of these measurements with respect to the project site. The measurements were taken during midday hours on Wednesday, June 26, 2019. These measurements were located adjacent to residences on Country Park Road and to River Road.

Figure 11-2 Noise Measurement Locations

They were intended to be representative of existing traffic noise levels along River Road and at the nearest residences facing the project site. Table 11-1 summarizes the noise monitoring results.

Table 11-1

Noise Measurement Results

Measurement Location	Description	Primary Noise Source	Sample Time	Noise Level (L_{eq} dBA)
1	Northeast corner of project site adjacent to residence on Country Park Road (285 feet south of River Road centerline)	Traffic, birds	11:06 A.M. – 11:36 A.M.	48.3
2	Eastern property line adjacent to residence on Country Park Road (850 feet south of River Road centerline)	Traffic, animals	11:46 A.M. – 12:06 P.M.	46.7
3	South side of River Road to west of Las Palmas Road (120 feet south of River Road centerline)	Traffic	12:14 P.M. – 12:34 P.M.	66.3
4	North side of River Road to west of Country Park Road (100 feet north of River Road centerline)	Traffic, tractor	12:43 P.M. – 1:03 P.M.	67.1
24-Hour Noise Measurement	Northern edge of project site (175 feet south of River Road centerline)	Traffic	24 hours	70.0
[1] Figure 11-1 shows the noise measurement locations. Refer to Appendix J for noise measurement results.				

As shown in Table 11-1, existing ambient noise is as high as 70.0 dBA Leq at a distance of 175 feet from River Road, over the course of a 24-hour measurement period. (The metric L_{eq} is an equivalent noise level over a given period of time.) Ambient noise decreases with greater distance from River Road. At measurement locations 1 and 2 next to residences on Country Park Road, ambient noise during midday weekday hours ranged from 46.7 to 48.3 dBA Leq.

Page 11-7, Section 11.8, first paragraph:

During operation of the proposed senior assisted living community, heating, ventilation, and air conditioning (HVAC) equipment would continuously generate noise. It is anticipated that HVAC equipment would be located on the rooftops of the proposed assisted living and senior assisted living facilities, which would be located as close as approximately 250 feet from the nearest residences on Country Park Road to the east. Rooftop-mounted HVAC equipment typically generates an average noise level of up to 70 dBA L_{eq} at a distance of 15 feet from the source (Illington & Rodkin 2009). Since noise from a point source would attenuate at a rate of approximately 6 dBA per doubling of distance from the source, it is estimated that HVAC noise would decrease to 46 dBA L_{eq} at a distance of 250 feet. This noise level would not approach the existing measured 24-hour noise level of 70.0 dBA L_{eq} in northern section of the project site. It

would also not exceed the range of ambient noise measured during midday weekday hours next to residences on Country Park Road (46.7 to 48.3 dBA L_{eq}). Therefore, HVAC noise would not have a substantial effect on ambient noise at off-site sensitive receptors.

Infrequent sources of long-term noise during operation of the project would include emergency vehicles and emergency generators. Emergency vehicles would be used on occasion to transport seniors needing emergency care from the project site to medical facilities. Sirens from emergency vehicles on River Road would result in a short-term spike in ambient noise levels at nearby residences. However, there is an agreement in place that the Subdivision is a "no-siren zone." Furthermore, Section 10.60.040.C.3 of the County Code exempts "emergency vehicles being operated by authorized personnel or equipment used in an emergency, such as chain saws" from noise regulation. Emergency generators would rarely be used, except in the event of a disruption in the normal power supply and at infrequent intervals when automatically starting up. Generators typically create noise reaching 82 dBA L_{eq} at a distance of 50 feet from the source (FTA 2018). It is assumed that generators, if placed outside, would serve the proposed assisted living and senior assisted living facilities, which are located approximately 250 feet away from the nearest residences. At this distance, generator noise would be about 68 dBA L_{eq}, assuming no attenuation by intervening topography. As noted above, equipment used in an emergency is exempt from the County's noise ordinance. Therefore, equipment noise would not result in a long-term increase in noise levels.

~~The proposed project is not expected to produce significant temporary or continuous noise from on-site operations that would significantly increase exiting ambient noise levels. The proposed project does not include point sources of high intensity noise or sources that are unique or excessive relative to other types of residential uses.~~ Due to the nature of the use at a senior assisted living community, the daily activities would be mostly confined inside of buildings. Any outdoor activities are expected to be low intensity passive uses that would not generate excessive noise. ~~Design of the facility, berms, and landscaping would further preclude noise from travelling off the property. On-site operations would not generate noise with an intensity that exceeds county standards at the nearby noise sensitive residential use.~~ On-site noise sources during operation of the proposed project, including HVAC equipment, emergency vehicles, and emergency generators, would have a less than significant impact on long-term noise levels.

Page 11-7, Section 11.8, second paragraph:

The Federal Highway Administration's Roadway Construction Noise Model (RCNM) was used to estimate the equipment noise levels for the proposed project at the nearest sensitive receptors for each phase of project construction: site preparation, grading, building construction, paving, and architectural coating. RCNM predicts noise levels based on the expected construction equipment in each phase of construction, empirical data for noise generated by this equipment, the expected usage of equipment during each work day, and formulas to estimate sound attenuation from source to receiver. A list of anticipated equipment and the number of each piece of equipment during construction was obtained from default settings for senior retirement communities in the California Emissions Estimator Model (CalEEMod).

Construction noise levels would attenuate at a rate of approximately 6 dBA per doubling of distance. Ground absorption adds to the attenuation from distance alone. This analysis is conservative because it does not account for further attenuation from intervening topographic features or structures between construction equipment and receivers and does not account for soft-site attenuation. The analysis makes another conservative assumption that construction

equipment would typically operate as close as 50 feet from sensitive receptors. This assumption does not take into account the fact that equipment is typically dispersed in various areas of a construction site, at greater distances from sensitive receptors. Due to site and equipment limitations, only a limited amount of equipment can operate near a given location at a particular time. Therefore, this analysis of construction noise impacts is highly conservative.

Construction activity on the project site would occur periodically during development of the proposed project, with the use of heavy equipment generating noise. Sensitive receptors that may be exposed to construction noise include existing residences in the Las Palmas Ranch #1 Subdivision to the east of the project site. Residences on Country Park Road, which parallels the eastern boundary of the project site, would be closest to construction noise on-site. In addition, assisted living facilities that would be built during an earlier construction stage could be exposed to noise generated by construction of subsequent buildings.

The effect of construction noise on sensitive receptors would depend on type of activity being undertaken and the distance to the receptor location. Construction noise impacts are most severe if construction activities occur during times of day when people are most sensitive to noise (early morning, evening, or nighttime hours), in areas immediately adjoining noise-sensitive land uses, or when construction duration lasts over extended periods of time. Table 11-2 shows the maximum expected noise levels at distances of 50 and 100 feet from construction equipment, based on the combined use of equipment anticipated to be used concurrently during each phases of construction modeled in RCNM.

Table 11-2

Estimated Noise Levels by Construction Phase

Construction Phase	Equipment	Estimated Noise Levels at Nearest Sensitive Receptors (dBA L_{eq})	
		50 feet	100 feet
Site preparation	Backhoe, bulldozer, tractor	86	80
Grading	Backhoe, bulldozer, excavator, grader, scraper	87	81
Building construction	Backhoe, crane, forklift, generator, tractor, welder	89	83
Paving	Paver, roller	80	74
Architectural coating	Air compressor	74	68

As shown in Table 11-2, construction activity at a distance of 50 feet from sensitive receptors would generate noise levels up to an estimated 89 dBA L_{eq} during building construction, 87 dBA L_{eq} during grading, and 86 dBA L_{eq} during site preparation. These estimates are highly conservative because they assume no attenuation of noise by topographic features or intervening structures and construction activity adjacent to sensitive receptors.

Compliance with County requirements would reduce the exposure of sensitive receptors to temporary increases in construction noise. Section 10.60.040 of the Monterey County Code of Ordinances would prohibit nighttime construction activity that generates exterior noise levels of at least 45 dBA L_{eq} or 65 dBA L_{max}, between 10 p.m. and 7 a.m. (The metric L_{max} is a maximum

noise level.) In addition, Policy S-7.9 in the Monterey County General Plan's Safety Element (2010) would prohibit construction activities that exceed "acceptable" noise levels "within 500 feet of a noise sensitive land use during the evening hours of Monday through Saturday, or anytime on Sunday or holidays, prior to completion of a noise mitigation study." This policy would apply to the proposed project because the existing measured 24-hour ambient noise level of 70.0 dBA L_{eq} in the project site exceeds the normally acceptable level of 60 dBA L_{eq} for residential land uses in Table S-2 of the Safety Element. Policy S-7.10 also would require the following standard noise reduction measures: ~~Construction activities on the project site would be subject to Monterey County construction noise standards, including:~~

- Construction shall occur only during times allowed by ordinance/code unless such limits are waived for public convenience;
- All equipment shall have properly operating mufflers; and
- Lay-down yards and semi-stationary equipment such as pumps or generators shall be located as far from noise-sensitive land uses as practical.

Adherence to construction noise restrictions in the Monterey County Code Chapter 10.60.40 and Monterey County General Plan Policies S-7.9 and S-7.10 would substantially reduce the exposure of sensitive receptors to temporary increases in construction noise, especially during sensitive evening and nighttime hours. As a condition of approval, the County would require that the project adhere to these General Plan policies to minimize construction noise. These requirements would reduce construction-related noise impacts to less than significant.

Pages 11-7, last paragraph, and 11-8, first paragraph:

~~Increases in traffic generation may result during construction activities and from employee trips to and from the facility, which may elevate noise levels along local roadways. The Monterey County General Plan EIR concluded that the General Plan Noise Element provides sufficient analysis thresholds and recommendations for noise attenuation to effectively mitigation transportation noise impacts.~~ The project would increase traffic and traffic-related noise through the Subdivision during both the construction and operational phase. ~~-~~Construction traffic would be temporary and would not have a long-term effect on traffic noise near the project site. The effect of operational traffic on ambient noise from traffic on River Road was estimated using the U.S. Department of Housing and Urban Development's Site Day/Night Noise Level (HUD DNL) Calculator (DNL calculation sheets can be viewed in Appendix J to the Final SEIR). The HUD DNL Calculator is an electronic assessment tool based on the HUD Noise Assessment Guidelines that calculates the Day/Night Noise Level from roadway traffic. Modeled noise levels are in terms of the Day/Night Noise Level (L_{dn}), a 24-hour metric which adds a penalty of 10 dBA to actual nighttime (10:00 p.m. to 7:00 a.m.) noise levels to account for the greater sensitivity to noise during that time period.

The noise analysis conducted with the HUD DNL Calculator is based on traffic volumes in the Riverview at Las Palmas Senior Housing Traffic Impact Analysis prepared in June 2017 (Higgins 2017). The nighttime percentage of trips was assumed to be the default value of 15 percent, and speed limit was set at 55 miles per hour (as posted). A modal split of 80 percent cars, 15 percent medium trucks, and 5 percent heavy trucks was assumed for River Road. Traffic on low-volume residential streets in the Subdivision was not modeled because it does not substantially contribute to ambient noise levels relative to traffic on River Road. Based on the roadway traffic volumes presented in the traffic study (Higgins 2017), the volume of average daily traffic on River Road would be approximately five to ten times higher than the volume of existing traffic

plus project-generated trips on Subdivision streets. Therefore, traffic on River Road is the primary driver of ambient noise levels near the project site.

Two locations at ground level on the project site were analyzed with the HUD DNL Calculator, one where the 24-hour noise measurement was taken in the northern section of the project site (175 feet from River Road) and one where a 20-minute noise measurement was taken near the southern end of Country Park Road (850 feet from River Road). These locations were selected to reflect the range of ambient noise across the project site. While the HUD DNL Calculator does not account for differences in elevation between the noise source and sensitive receptors. intervening topography does partially block traffic noise in the southern portion of the project site. For this reason, it is expected that modeled noise in the southern portion of the project site would be higher than actual noise. Therefore, the approach to modeling traffic noise is conservative.

Using the HUD DNL Calculator, traffic noise in the project site at a distance of 175 feet from River Road was estimated at 68 dBA L_{dn} under both existing and with-project traffic conditions. At a distance of 850 feet from River Road, traffic noise was estimated at approximately 58 dBA L_{dn} under both existing and with-project traffic conditions. The addition of traffic generated by operation of the proposed project would not perceptibly increase traffic noise from River Road.

Project-generated traffic would also increase traffic volumes on residential streets in the Subdivision that lead to the project site, including Las Palmas Road, River Run Road, and Woodridge Court. However, these residential streets are secondary noise sources relative to River Road, and their traffic volumes would not increase to the extent that ambient noise at sensitive receptors would substantially increase. Therefore, the project would have a less than significant impact from increasing traffic noise.

Pages 11-8 through 11-9:

The proposed project may contribute to future demand for new fire and police protection facilities, the construction of which could have potential to create adverse impacts.

Neighboring Las Palmas Ranch #1 currently has private security for the subdivision. The proposed project would participate proportionately in the cost of that security and will provide additional on-site security, which would lessen the need for on-site police protection. As described in the Project Description, a written agreement between the project applicants and the HOA would be necessary to clarify cost-sharing for road maintenance and private security service.

The Monterey County General Plan EIR determined that impacts would be less than significant with full buildout of the general plan because if new facilities are required in the future to meet demand, they would be subject to independent CEQA review~~; mitigation of any significant impacts that may be identified would be required where feasible~~.

Fire Protection

The Monterey County Regional Fire District (MCRFD) provides fire protection and emergency services to portions of the county, which includes the project site. Services include response to fires (structural, wildland, vehicle, and other types), medical emergencies, vehicle accidents, and hazardous materials accidents with staffing across seven fire stations (MCRFD 2019). The MCRFD covers a service area of approximately 400 square miles and maintains mutual aid agreements with neighboring fire departments and CAL FIRE (Monterey County RMA 2008). As of 2019, the MCRFD had 62 full-time employees and 15 volunteer firefighters (MCRFD 2019).

The Toro Station (19900 Portola Drive, City of Salinas) is located nearest to the project site, approximately one mile southwest from the project site (MCRFD 2019). Personnel, fire protection resources, and emergency medical response and transport from the Toro Station would be first to respond to the project site when calls are placed to the MCRFD. The anticipated response time from the Toro Station to the project site is approximately five minutes for "Code 3" emergency calls, while "Code 2" non-emergency calls may be five minutes or slightly more based on traffic conditions at the time of the call (Priolo 2019). The maximum emergency response time service standard for fire protection is five to eight minutes for calls received in urban (developed) areas according to the County General Plan Public Services Element (Monterey County RMA 2010). Therefore, the Toro Station's anticipated response time to the project site would meet the County' General Plan standard for fire response. The Toro Station's current fire protection equipment stock and personnel rotation were determined by MCRFD to be sufficient in meeting fire protection and emergency medical response for the project's residents and employees (Priolo 2019). The project would not require construction of new or expanded fire service facilities or equipment.

The MCRFD also provides technical review of building construction plans to ensure proposed buildings, proposed site access, and on-site circulation meet the Fire District's adopted 2013 California Fire Code and applicable roadway design requirements prior to construction. The MCRFD reviewed the proposed site and building plans for the project as part of the County's review process and determined that a fire flow rate of 1,500 gallons per minute at a pressure of 20 pounds per square inch for a duration of up to three hours would be sufficient for the project since a fire sprinkler system for all proposed buildings would also be included as part of the project (Monterey County RMA 2015, 2016). The project would implement all design recommendations provided by the MCRFD to ensure project compliance with the Fire District's regulations and reduce fire hazards on the project site, as noted in Topical Response B of Section 2, *Topical Responses*.

Furthermore, developers in Monterey County are required to pay development impact fees that would go toward fire protection facilities, pursuant to Monterey County's Fire Mitigation Fee Ordinance (County Ordinance Title 10, Chapter 10.80) which constitute the project's contribution to the cumulative impact on the existing fire protection equipment and facilities Monterey County 2019; Priolo 2019). Therefore, the project would have a less than significant impact on fire protection since no new or expanded facilities are required as a result of the project, and with the project's adherence to applicable fire safety codes and design features as approved by MCRFD and payment of the County's Fire Mitigation Fee.

Police Protection

The Monterey County Sheriff's Office provides police protection services to unincorporated portions of the county, which includes the project site. Services include patrol, crime prevention, and crime investigation provided from three offices located in Monterey, Salinas, and King City (Monterey County RMA 2008). The Sheriff's Office has a total of 442 employees that consists of 320 sworn officers and deputies, and 122 non-sworn officers and professional staff (Galletti 2019). Based on the County's current population estimate of 110,000 residents (unincorporated; CA DOF 2019), the Sheriff's Office maintains a service ratio of approximately three sworn officers for every 1,000 residents (unincorporated).

The project site is located in Beat 4B, which is served by officers and staff located in the Central Station (1414 Natividad Road, City of Salinas), which is approximately six miles northwest from the project site (Galletti 2018). The Central Station has one Beat 4 deputy officer for each of the

three daily shifts, who patrols both the Beat 4A and Beat 4B areas. However, additional personnel assigned to the Central Station include one Station Commander, nine sergeants, and 45 deputies across the three daily shifts (Galletti 2019).

The average response time for all call types for the Las Palmas area of the Beat 4B area is 17 minutes and 47 seconds, where average response time for Priority 1 (emergency) calls is 12 minutes and 55 seconds (Galletti 2019). The County General Plan Public Service Element states that maximum emergency response time for emergency calls for the Sheriff's Office in urban (developed) areas is five to eight minutes (Monterey County RMA 2010). Therefore, the Central Station does not currently meet the County' General Plan standard for Sheriff response.

The project would increase demand for emergency police services with the construction of the proposed senior and assisted living units and the addition of approximately 142 residents and a total of 92 employees across five shifts per day. The project site is located adjacent to the Las Palmas Ranch Phase #1 Subdivision community, which is already served and patrolled by the Sheriff's Office. The 66 proposed assisted living units would not exceed the capacity of the Sheriff Department to provide police services to the area, and the project would have no impact on the Sheriff's Office's ability to provide police protection services (Galletti 2018, 2019).

Furthermore, the Las Palmas Ranch Phase #1 Subdivision currently pays for private security service. There is a guard at the main entrance during the day time, but the post is not staffed in the evening or nighttime hours. A periodic patrol through the Subdivision is done at night. Given the project is for a senior assisted living community it is unlikely there will be a significant exposure to the need for increased police protection. Fire and ambulance service already exist for the project site vicinity and there is an agreement in place that the Subdivision is a "no-siren zone." The proposed project would participate proportionately in the cost of the Subdivision's security service, as discussed in Topical Response A of Section 3, *Responses to Comments on the Draft SEIR*.

Therefore, the proposed project would have a less than significant impact on police protection since no new or expanded facilities would be required as a result of the project, and with the project's payment of applicable taxes and/or fees and the proportional contribution to private security services with adjacent existing communities.

Schools

~~As a senior living facility, the project would not generate any students. Therefore, the project would not result in the need for new or physically altered school facilities.~~ The proposed project would intensify residential density at the project site by a net increase of 66 residential units to be occupied by 142 residents. As a senior assisted living facility, all proposed residential units would be occupied by seniors (i.e., age 55 +) requiring living assistance, and school-aged children would be prohibited from residing at the proposed project. Therefore, the project would not generate any students for the Salinas Union High and the Spreckels Union School Districts, which provide public school services to the project site. Although the proposed assisted living development would not increase the number of school attendees, the project applicant would be required to pay applicable developer fees to both school districts prior to the issuance of building permits, pursuant to the Leroy F. Greene School Facilities Act of 1998 (SB 50) and Government Code Section 65995(h). Therefore, the project would not require new or expanded school facilities, and the project would have no impact on local school services.

Parks and Other Facilities

~~There would likely only be minimal use of existing recreational facilities in the area. Due to the projects nature and design as a senior assisted living facility containing its own recreational facilities, it is unlikely residents would use off site recreation facilities. No new recreation facilities will be required to be constructed other than those which will be incorporated into the project.~~ The proposed site plan indicates the provision of open space for residential use and other recreational amenities on the project site. Due to the nature and design of the project with the proposed use as a senior assisted living facility containing its own recreational amenities, it is unlikely residents would use off-site recreation facilities. No new public recreation facilities will be required to be constructed other than those which will be incorporated into the project. The project would have no impact on public recreational facilities.

The project site is served by the Buena Vista Branch Library (18250 Tara Drive, City of Salinas), located approximately two miles southeast of the project site. The Buena Vista Branch Library is part of the Monterey County Free Libraries (MCFL) system, which is financed by property tax collected from the service area and the Foundation for MCFL (MCFL 2019). The project would incrementally increase the demand for library use, but would not require the construction or expansion of new library facilities since library visits by project residents may be limited based on mobility as not all residents would have personal vehicles. Furthermore, the MCFL has several programs in place to ensure County residents have access to library resources such as the MCFL's Library by Mail program, electronic books and media that can be borrowed on personal electronic devices, and visits to the facility from the MCFL's bookmobile which can be coordinated between the facility and MCFL's Outreach Department (Ricker 2019). The facility would provide a shuttle service to residents, who may visit the Buena Vista Library which is ADA accessible with a vanpool parking space. The MCFL also provides workshops and events that may be of specific interest to senior citizens, such as tax preparation assistance and senior health resource presentations (Ricker 2019). Furthermore, the project would contribute to the financing of library services through property taxes, which would mitigate the need for new or physically altered government facilities that support library use. Therefore, the project would have a less than significant impact on the Buena Vista Branch Library since the project would not require new or expanded library facilities.

The Salinas Valley Memorial Hospital (450 E. Romie Lane, City of Salinas) is the nearest public hospital to the project site, located approximately five miles northeast from the project site. The Memorial Hospital contains 263 beds for acute care and over 1,800 hospital and medical staff that includes over 300 board-certified physicians (Salinas Valley Memorial Healthcare System 2019). The Memorial Hospital had over 55,000 emergency room visits in 2017 (Salinas Valley Memorial Healthcare System 2017). Emergency medical transportation from the project site would be dispatched through the MCRFD and County Sheriff's Office, pursuant to their respective response times. The Memorial Hospital assigns one patient per room during normal operations, though under seasonal peaks (i.e., flu season), two patients may be assigned to each room with a privacy curtain and additional staff may be brought in to provide care as part of the Memorial Hospital's primary contingency plan (Rusk 2019). Patients may also be diverted to neighboring hospitals if the Memorial Hospital reaches maximum capacity beyond the primary contingency plan (Rusk 2019). Because of the existing provisions to provide care during seasonal peaks, it is not anticipated that the proposed project would generate demand sufficient to require expansion of the existing hospital. Therefore, the project would have a less than

significant impact on the Salinas Valley Memorial Hospital for project since the project would not require new or expanded public hospital facilities.

Table 3-1 Policy Consistency Review (Las Palmas Ranch Specific Plan, Monterey County 2010 General Plan, Toro Area Plan)

	Consistency	Discussion
Las Palmas Ranch Specific Plan Policy		
Housing and Residential Land Use		
Policy 7. In order to preserve the semi-rural character of the area and to mitigate adverse impacts on significant viewshed areas, higher density housing should be clustered behind natural land forms, generally at lower elevations and not on steeper slopes or ridge lines.	Consistent with application of mitigation measures	Although the proposed project is not a residential project, it is located within an area designated "sensitive viewshed." Section 5.0, *Aesthetics,* of the Draft SEIR included visual simulations from SR 68 and from Reservation Road. The simulations show that although the project would be visible from these locations, the project is not located on steeper slopes and will not constitute ridgeline development. Mitigation measures ensuring the adverse impact is less than significant are: 1) requiring a landscape plan to screen the project site from SR 68, Reservation Road, and River Road, as well as from the adjacent neighborhood and trail; 2) building colors and materials to be earth toned to blend with the existing vicinity landscape; and 3) requiring all new utility and distribution lines on the project site to be underground.
Circulation		
Policy 1. Provide a system of pathways suitable for pedestrian and bicycle use to connect residential areas with commercial, educational and recreational areas of the project.	Consistent	As a condition of project approval, the County will require a system of pathways suitable for pedestrian and bicycle use both internal to the project and to connect the project with the existing system of pathways to other areas of Las Palmas Ranch.
Policy 3. Adequate off-street parking should be provided as a means of reducing road congestion, particularly in areas where reduced road right-of-way is proposed.	Consistent	The project meets the County standards for provision of off-street parking. The project requires a minimum of 86 parking stalls, and the project will provide 106 parking stalls.
Policy 4. Turnouts and turnaround facilities may be required to accommodate emergency vehicles in areas of reduced right-of-way or where longer cul-de-sacs are proposed.	Consistent with application of mitigation measures	Secondary access between River Road and the project site during emergency evacuations would be available through the lawn area between County Park Road and Woodridge Court. Secondary access would not be provided on Woodridge Court between Country Park Road and the first internal parking lot aisle. Mitigation Measure TRA-3 would be required to install improvements that improve access to the lawn area and Woodridge Court. With implementation of this measure, the project would have a less than significant impact on emergency access
Policy 5. Interior roads shall have longitudinal grades not exceeding 15 percent.	Consistent	The project is not proposing any roads with a grade of greater of 15 percent.

	Consistency	Discussion
Policy 7. The internal circulation system should be designed to accommodate a level of service "C" at full buildout. A trip generation factor of 8.0 trips per day per unit shall be used for this project.	Consistent	The Higgins traffic report evaluated the proposed project's traffic impact on the existing Las Palmas neighborhood streets that would be used to access the project. The report concluded that existing Las Palmas traffic averages about 7.1 trips per home, less than the 8.0 trip generation factor in this policy, and less than the ITE trip generation rate of 9.57 trips per home. The ITE trip generation rate for the proposed project ranges from 2.74 for assisted living facilities to 3.44 for attached senior housing. The proposed project is projected to result in 363 average trips per day. If the project site were developed with 40 medium density homes as allowed by the project site's existing zoning, the daily trip generation would be 284 (40 units x 7.1 trips per day). Therefore, the proposed project would result in about 28 percent more trips per day than would a 40-unit multi-family subdivision. However, the report concluded that even with the project, each street used to access the project would operate well below the designed carrying capacity of each street. See Section 4.3, Existing Plus Project Conditions Road Segment Operations, in the traffic report.
Policy 10. Horizontal and vertical street alignments should relate to the natural contour of the site insofar as practical, while retaining safe sight distance for expected driving speeds but not less than 25 mph.	Consistent	The proposed street alignment follows the natural contours of the site, as shown in the site plan.
Policy 14. Internal road connections should be provided where feasible between the areas of the subdivision in order to minimize the need for River Road to provide a route for intra-subdivision traffic.	Consistent	The proposed project is designed to take access from the signalized intersection at River Road and Las Palmas Road to River Run Road, then Woodridge Court. River Road is a public road maintained by the County of Monterey. Las Palmas Road, River Run Road, and Woodridge Court are private roads maintained by the Las Palmas Ranch Home Owners Association. Woodridge Court terminates at the entrance to the project site. Access to the proposed development will be by a private loop drive. Therefore, the proposed project includes an internal road connection between the proposed project and the adjacent residential subdivision, which eliminates the need for River Road to provide a route for intra-subdivision traffic.
Policy 16. The developer shall pay a development fee to the County for improvements to SR 68. This development fee shall be $620.75 per residential unit (a total of $640,000.00 being 10.66% of the estimated cost of the two lane first phase of the Corral de Tierra bypass), and shall be payable as to each residential unit at the time the building permit for the residence is issued.	Consistent	There are no residential units associated with the proposed project and therefore, this policy does not apply. However, as a condition of project approval, the applicant will be required to pay the Monterey County countywide traffic impact fee and the TAMC regional development impact fee to mitigate for the project's fair share of cumulative traffic impacts.

	Consistency	Discussion
Open Space And Conservation		
Policy 1. The following constitute the open space elements of Las Palmas Ranch to be protected: a. The Salinas River bank and the riparian vegetation adjacent thereto; b. The agricultural land north of River Road; c. The central ridge lines and north-facing frontal slopes visible from the SR 68 Scenic Corridor. d. The Corey House.	Consistent	The proposed project would not have an effect on the Salinas River bank and its associated riparian vegetation, nor would it have an effect on agricultural land north of River Road. The proposed project would not have an effect on the Corey House. The proposed project would be visible from SR 68. However, as presented in Section 5.0, *Aesthetics,* of the Draft SEIR, visual simulations from SR 68 and from Reservation Road were prepared. The simulations show that although the project would be visible from these locations, the project is not located on steeper slopes and will not constitute ridgeline development. Mitigation measures ensuring the adverse impact is less than significant are: 1) requiring a landscape plan to screen the project site from SR 68, Reservation Road, and River Road, as well as from the adjacent neighborhood and trail; 2) building colors and materials to be earth toned to blend with the existing vicinity landscape; and 3) requiring all new utility and distribution lines on the project site to be underground.
Policy 2. Prohibit building on ridgelines visible from designated scenic corridors, as delineated.	Consistent	See discussion of Open Space Policy 1 above.
Policy 10. Utilize mounding, informal massing, or irregularly spaced trees, planting and other overall landscaping treatment to screen development.	Consistent	A mitigation measure is presented in Section 5.0, *Aesthetics,* of the Draft SEIR to ensure the proposed project is adequately screened from SR 68, River Road, and Reservation Road.
Policy 11. Visually obtrusive building materials and finishes shall be avoided.	Consistent	A mitigation measure is presented in Section 5.0, *Aesthetics,* of The Draft SEIR that requires the applicant submit a final plan for colors and materials used for the buildings, which shall be earth toned to blend with the existing vicinity landscape.
Energy Conservation Policies		
Policy 1. Each residential unit should be should be afforded adequate solar access for the operation of active and passive solar systems. Locating structures with their major axis oriented within 22.5 degrees of true east/west is generally the best means to insure adequate south-facing solar access. For single-family homes, the orientation is fairly simple to implement as is full access to the south wall for passive solar design. For multi-family units, orientation and access are more difficult; generally south roof access for active space hearing or domestic water hearing systems is considered sufficient.	Consistent	The proposed project does not currently include the use of solar energy in the project materials. However, the Energy section of the Draft SEIR requires the applicants to demonstrate how the project will be consistent with this policy, prior to issuance of building permits.

	Consistency	Discussion
Policy 2. Careful design of structures to utilize solar access and to control heat loss and heat gain can achieve significant energy conservation. When these design elements are coupled with passible design features (thermal storage units, south facing glass, domestic hot water systems and other energy conserving components), the energy conservation potential greatly increases. Support structures built by the developer such as commercial areas, swimming pools, recreation and community buildings should make maximum use of alternate energy sources both to reduce operation costs and to serve as community examples.	Consistent	See the Energy Conservation Policy 1 discussion above.
Design and Sensitivity		
Policy 1. All areas of the project proposed for structural development shall be placed in a sign and design control district to ensure county enforcement of the design policies of this specific plan.	Consistent	The project site has a zoning designation of MDR/2.61-D (Medium Density Residential, 2.61 units per acre; Design Control).
Policy 3. All structures, including residential, commercial, recreational and accessory buildings; fences; walls; decks and signs shall require design approval. Approval shall be based upon conformity with the policies of this plan as well as the following specific criteria: A. Compatibility of external design, materials and colors with existing ground elevations and natural land forms. B. Conformity of design and location of structures with respect to existing ground elevations and natural land forms. C. Mitigation of visual impacts from within the development and from major designated view corridors outside of the project. D. Protection of significant trees and vegetation. Trees over 36" in circumference (four feet above the ground) shall be retained. Where it is necessary to remove such trees for better design or layout, then they shall be replaced on a two for one basis subject to the approval of the Director of Planning. E. Prevention of erosion, sedimentation and visual impacts resulting from grading, excavation, cutting or filling.	Consistent	The proposed project requires a conditional use permit and design review. A. A mitigation measure is presented in Section 5.0, *Aesthetics,* of the Draft SEIR that requires the applicant submit a final plan for colors and materials used for the buildings, which shall be earth toned to blend with the existing vicinity landscape. B. The project site is a generally level plateau, which has been identified as an acceptable building envelope from a geologic and soils perspective. The project will not result in ridgeline development or have an adverse effect on natural land forms. C. A mitigation measure is presented in Section 5.0, *Aesthetics,* of the Draft SEIR to ensure the proposed project is adequately screened from SR 68, River Road, and Reservation Road. D. The project does not include the removal of trees protected by the Monterey County Municipal Code, Chapter 16.60 – Preservation of Oak Trees and Other Protected Trees within the Toro Plan area. Eucalyptus trees are not native and therefore, are not protected by the county. E. As described in Section 11.0, *Effects Not Found to be Significant,* of the Draft SEIR, the proposed project would not have significant impacts with erosion, sedimentation, or visual impacts resulting from grading, excavation, cutting or filling. Refer to Topical Response E of this Final SEIR for more information.
Policy 4. To the extent feasible, all structures should utilize natural materials such as wood and native stone and low intensity earth-tone exterior colors. Visually obtrusive building materials shall be avoided.	Consistent	A mitigation measure is presented in Section 5.0, *Aesthetics,* of the Draft SEIR that requires the applicant submit a final plan for colors and materials used for the buildings, which shall be earth toned to blend with the existing vicinity landscape.

	Consistency	Discussion
Policy 5. Low level exterior lighting, including street lighting shall be utilized with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. Street lights may not be used unless approved as conditions of permits obtained pursuant to this plan.	Consistent	Section 5.0, *Aesthetics,* of the Draft SEIR concluded that the proposed project could have an adverse lighting effect. With implementation of Mitigation Measure AES-4, which requires all exterior lighting to be unobtrusive, down-lit, harmonious with the local area, and constructed or located sot that only the intended area is illuminated and off-site glare is fully controlled, lighting impacts would be less than significant and the proposed project would be consistent with this policy.
Policy 6. Horizontal and vertical street alignments should relate to the natural contours of the site insofar as is practical. Roads which are perpendicular to viewing areas or which involve excessive cut and fill should be discouraged.	Consistent	The proposed street alignment follows the natural contours of the site, as shown in the site plan. The site is not located perpendicular to a viewing area, nor would it require excessive cut and fill.
Policy 7. Mounding, informal massing, or irregularly spaced trees, planting and other overall landscaping treatment should be utilized to screen development.	Consistent	A mitigation measure in Section 5.0, *Aesthetics,* of the Draft SEIR requires the use of mounding, informal massing, or irregularly spaced trees and plantings.
Policy 8. Preserve vegetation significant to the maintenance of visual quality and to the provision of erosion control on sensitive slopes.	Consistent	The vegetation on the slopes surrounding the development area would be preserved.
Erosion Drainage and Flood Control		
Policy 1. A comprehensive drainage plan for the entire project shall be prepared by the developer, and submitted to and approved by the County prior to final discretionary approval is given by the County for any portion of the development authorized by this specific plan.	Consistent	A Conceptual Stormwater Control Plan (Gateway Engineering 2017) was developed for the project as part of the preliminary design to address stormwater management for the project site in conformance with County and State regulatory requirements. The plan illustrates the location of impervious and pervious areas, storm flow direction and stormwater control facilities.
Policy 3. Provide drainage reports for each phase of development showing all tributary areas and information pertinent to the capability of stormwater detention and silt control facilities and mitigations for such identified impacts will be implemented.	Consistent	The proposed project design includes storm drainage facilities (collection, conveyance and disposal) as detailed in the stormwater control plan (Gateway Engineering 2017) to meet the generation of stormwater 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 stormwater flow. The stormwater control plan includes on-site stormwater control measures designed to achieve a no net increase in rate of stormwater 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.
Policy 4. Provide stormwater detention/siltation ponds so that the flow rate from development will not exceed that from the tributary areas in its natural state during a ten year design storm.	Consistent	See discussion of Erosion Drainage and Flood Control Policy 3 above.
Policy 7. Minimize disturbance or removal of existing vegetation, including trees, shrub and grasses or other ground covers.	Consistent	The project is proposed on approximately 17 percent of the project site. The remainder of the site would be retained in its existing vegetation.

	Consistency	Discussion
Policy 8. Provide engineering plans with each phase of development demonstrating that cut and fill slopes can be stabilized; the specific method of treatment and type of planting by area for each soil type and slope required to stabilize cut and fill slopes; and the time and amount of maintenance required to stabilize cut and fill slopes.	Consistent	According to the geologic hazards report and soil engineering feasibility investigation prepared for the project (Landset Engineers 2014), the steep slopes on the northerly and southerly flanks of the non-developable portion of the project site are prone to landsliding and slope failure. In order to mitigate the potential hazards from landsliding and slope instability, building foundations must be located within the geologically suitable building envelope as presented in the report. The proposed project is located within the geologically suitable building envelope, and the project would be required to comply with the recommendations of the geotechnical report as a condition of approval.
Public Facilities and Services - Water		
Policy 1. As the first priority the entire development must be served by a public utility water company providing domestic and fire flow in accordance with the requirements of State and County health and fire agencies. If a public utility water company satisfactory to the County if not feasible, then an incorporated mutual water company may perform this function.	Consistent	Water demand is evaluated in the Water Demand section of the Draft SEIR. The proposed project would have a water demand of approximately 11.4 acre feet per year (AFY). California Water Service, the water purveyor for the specific plan area, has provided a "can and will serve" for the proposed project. As presented in Table 10-2 in the Water Demand section, the 1982 EIR identified that buildout of Las Palmas Ranch would require 922 AFY. However, the Board of Supervisors modified the proposed specific plan, and the adopted specific plan required on 599 AFY. Actual water use at Las Palmas is estimated to be about 182 AFY. Therefore, with the addition of the proposed project, the total water use at Las Palmas is expected to be about 193.4 AFY, significantly less that what was allowed by the adopted specific plan.
Policy 2. Availability of water meeting the requirements of Policy No. 1 shall be demonstrated as to each increment of development prior to filing of a final subdivision map or issuance of any building permit for that increment of development.	Consistent	California Water Service, the water purveyor for the specific plan area, has provided a "can and will serve" for the proposed project.

	Consistency	Discussion
General Plan Policy		
Land Use		
LU-1.5 Land uses shall be designated to achieve compatibility with adjacent uses.	Consistent	Adjacent uses include the Las Palmas Ranch residential neighborhood to the east, open space to the south and west, and agricultural land across River Road to the north. The proposed project is located about 300 feet from the agricultural fields and is buffered by an existing grove of eucalyptus trees and River Road. The proposed project is a continuum of care residential community designed to provide care to seniors over the age of 55 and to persons with diminishing mental capacity due to Alzheimer's, dementia, or similar causes. This type of use, as well as the density and design of the proposed project, is similar to and consistent with residential uses in Las Palmas Ranch.
LU-1.9 Infill of vacant non-agricultural lands in existing developed areas and new development within designated urban service areas are a priority. Infill development shall be compatible with surrounding land use and development.	Consistent	The proposed project is located on land that is designated Medium Density Residential, is non-agricultural land, is vacant, and is located in the existing developed Las Palmas Ranch. Urban services, including water and wastewater, are available to the project.
LU-1.11 Development proposals shall be consistent with the General Plan Land Use Map designation of the subject property and the policies of this plan. (Land Use Maps for each of the following Planning Areas are shown at the end of their respective Area/Master Plan except the Coast Area, which is located at the end of this Element). a. Coast Area, Figure LU1 b. Cachagua (CACH), Figure LU2 c. Carmel Valley Master Plan, (CV), Figure LU3 d. Central Salinas Valley (CSV), Figure LU4 e. Greater Monterey Peninsula (GMP), Figure LU5 f. Fort Ord Master Plan, (FO), Figure LU6 g. Greater Salinas (GS), Figure LU7 h. North County (NC), Figure LU8 i. South County (SC), Figure LU9 j. Toro (T), Figure LU10	Consistent	The proposed project is located on land designated for Medium Density Residential (MDR) uses. The MDR designation allows for "…a range of residential uses (1-5 units/acre) and housing types, recreational, public and quasi-public, and other uses that are incidental and subordinate to the residential use and character of the area…" The proposed project meets the definition for a quasi-public use, as well as the Monterey County MDR zoning district the site is located in, and is therefore consistent with the General Plan Land Use Map designation. The proposed project also includes the following amendment to the Las Palmas Ranch Specific Plan to clarify allowance of the proposed use in the MDR district. "Assisted living facilities are conditionally allowable uses in the MDR district in that they are similar to other uses such as rest homes and public quasi-public uses currently allowed in the district. Assisted living facilities are not considered residential units and are not subject to the current 1,031 residential unit limitation of the specific plan. An assisted living facility is not considered a residential development because it does not operate or function in a manner like independent residential units. An assisted living facility may, therefore, be considered and approved through a conditional use permit on Parcel Q of Las Palmas Ranch Unit #1." The proposed project would be consistent with this policy, and with the proposed amendment this consistency would be made clear.

	Consistency	Discussion
LU-1.13 All exterior lighting shall be unobtrusive and constructed or located so that only the intended area is illuminated, long range visibility is reduced of the lighting source, and off-site glare is fully controlled. Criteria to guide the review and approval of exterior lighting shall be developed by the County in the form of enforceable design guidelines, which shall include but not be limited to guidelines for the direction of light, such as shields, where lighting is allowed.	Consistent	Section 5.0, *Aesthetics,* of the Draft SEIR concluded that the proposed project could have an adverse lighting effect. With implementation of Mitigation Measure AES-4, which requires all exterior lighting to be unobtrusive, down-lit, harmonious with the local area, and constructed or located sot that only the intended area is illuminated and off-site glare is fully controlled, lighting impacts would be less than significant and the proposed project would be consistent with this policy.
LU-1.19: Community Areas, Rural Centers and Affordable Housing Overlay districts are the top priority for development in the unincorporated areas of the County. Outside of those areas, a Development Evaluation System shall be established to provide a systematic, consistent, predictable, and quantitative method for decision-makers to evaluate developments of five or more lots or units and developments of equivalent or greater traffic, water, or wastewater intensity. The system shall be a pass-fail system and shall include a mechanism to quantitatively evaluate development in light of the policies of the General Plan and the implementing regulations, resources and infrastructure, and the overall quality of the development. Evaluation criteria shall include but are not limited to: a. Site Suitability b. Infrastructure c. Resource Management d. Proximity to a City, Community Area, or Rural Center e. Mix/Balance of uses including Affordable Housing consistent with the County Affordable/Workforce Housing Incentive Program adopted pursuant to the Monterey County Housing Element f. Environmental Impacts and Potential Mitigation g. Proximity to multiple modes of transportation h. Jobs-Housing balance within the community and between the community and surrounding areas i. Minimum passing score Residential development shall incorporate the following minimum requirements for developments in Rural Centers prior to the preparation of an Infrastructure and Financing Study, or outside of a Community Area or Rural Center: 1) 35% affordable/Workforce housing (25% inclusionary; 10% Workforce) for projects of five or more units to be considered. 2) If the project is designed with at least 15% farmworker inclusionary housing, the minimum requirement may be reduced to 30% total. This Development Evaluation System shall be established within 12 months of adopting this General Plan.	Consistent	The project site is not within a Community Area, Rural Center, or Affordable Housing Overlay District. Thus, the project should be analyzed pursuant to the Development Evaluation System (DES) required by this policy. Pending adoption of a detailed program implementing the DES, the County has been implementing the DES through application of the criteria in LU-1.19. Accordingly, an interim analysis has been completed for this project based on the Policy LU 1.19 criteria. The objective of the DES is to strongly discourage or avoid "leap frog" development not proximate to urbanized or community areas where public services and facilities exist. The project meets this objective of the DES. This proposed project is infill in nature and is the last developable site in the LPRSP area, near existing communities, major roadways, and services. The proposed project is consistent with the majority of the specified DES criteria, if the criteria are deemed to apply to an infill location such as the subject site. The affordable housing and jobs-housing balance criteria do not apply because the proposed project is not residential. In terms of "site suitability," "proximity to cities and communities," and "multiple modes of transportation," the project's location near an existing residential development makes the site suitable for the assisted living use proposed. The proposed site is less than 2 miles from the River Road Rural Center. The site's location provides efficient access to SR 68 via River Road, the major transportation corridor to the west of the site. Residents of the proposed project are not expected to need significant services outside of those provided at the assisted care facility, but the nearby Monterey Peninsula communities of Spreckels, Creekside, and Salinas are within short travel distance of the site and offer a wide range of commercial and personal services and medical care facilities if desired. The project will also include walking paths, and the applicants have proposed shuttle services for residents to access areas on the Monterey Peninsula and Salinas, including regular shuttle service for employees to transportation hubs nearby, as not all residents will have access to personal vehicles. Regarding "infrastructure and services," the site has received a "can and

	Consistency	Discussion
		will serve" letter from Cal Water and, as discussed above in the LPRSP analysis above under "Public Facilities and Services – Water", total water use at Las Palmas is expected to be about 193.4 AFY, significantly less than the 599 AFY that was allowed by the adopted specific plan. Additional infrastructure is existing or will be built concurrently with the project so the project site will be adequately served. Finally, regarding "resource management" and "environmental impacts and potential mitigations," the project would result in significant but mitigatable impacts on special status animal species. Construction of the proposed project could directly impact American badger, Monterey dusky-footed woodrat, western red bat, burrowing owl or nesting birds. This impact is also considered significant but mitigatable. In summary, when considered in relation to the DES criteria specified in General Plan Policy LU-1.19, the project is, overall, consistent with LU-1.19.
LU-8.1 The open space needs of the community and new development shall be reviewed and addressed through the planning process. The extent of use of land for this designation shall be limited to building coverage of 25% of the subject property.	Consistent	The project site is 15.67 acres. Proposed building coverage totals 90,006 square feet (approximately 2.1 acres). Therefore, total building coverage is approximately 13 percent.
Circulation		
C-1.1 The acceptable level of service for County roads and intersections shall be Level of Service (LOS) D, except as follows: a. Acceptable level of service for County roads in Community Areas may be reduced below LOS D through the Community Plan process. b. County roads operating at LOS D or below at the time of adopting this General Plan shall not be allowed to be degraded further except in Community Areas where a lower LOS may be approved through the Community Plan process. c. Area Plans prepared for County Planning Areas may establish an acceptable level of service for County roads other than LOS D. The benefits which justify less than LOS D shall be identified in the Area Plan. Where an Area Plan does not establish a separate LOS, the standard LOS D shall apply.	Consistent	The traffic report includes an evaluation of project impacts at the River Road/Las Palmas Road intersection, which would be the county intersection most affected by the proposed project. The intersection currently operates at level of service A, with a 4.9 second delay in the AM peak hour, and LOS A with a 4.2 second delay in the PM peak hour. With the addition of project traffic, the intersection would continue to operate at LOS A with a 5.0 second delay in the AM peak hour, and LOS A with a 4.4 second delay in the PM peak hour. Therefore, the proposed project would be consistent with this policy. The Toro Area Plan does not establish a separate level of service.
C-1.3 Circulation improvements that mitigate Traffic Tier 1 direct on-site and off-site project impacts shall be constructed concurrently (as defined in subparagraph (a) only of the definition for "concurrency") with new development. Off-site circulation improvements that mitigate Traffic Tier 2 or Traffic Tier 3 impacts either shall: a. be constructed concurrently with new development, or b. a fair share payment pursuant to Policy C-1.8 (County Traffic Impact Fee), Policy C-1.11 (Regional Development Impact Fee), and /or other applicable traffic fee programs shall be made at the discretion of the County.	Consistent	According to the traffic report (Exhibit 5, Intersection Levels of Service) the project would not result in significant impacts at the studied intersections, and with minimal increases in the existing delays at the intersections. Therefore, there are no Tier 1 project impacts to mitigate. However, under cumulative project conditions, the SR 68 intersections with Reservation Road and River Road would operate at unacceptable LOS D in one of the peak hours. Although the project's contribution to the traffic at these intersections would be minimal, the project would be required to pay the appropriate impact fees (county and TAMC) to

	Consistency	Discussion
Note: Tier 1 means impacts that are direct impacts on site, or off-site, but in the immediate vicinity of the project. *Tier 2 means direct or cumulative impacts to county roadways not in the immediate vicinity of development.* *Tier 3 means impacts to regional roadways and highways identified in the TAMC Regional Development Impact Fee Program.*		mitigate for the project's share of the necessary improvements to these intersections, in accordance with Policy C-1.8 and Policy C-1.11. These Tier 2 impacts would be mitigated though the payment of these impact fees. Additionally, the project would add one or more trips to SR 68 in the AM and PM peak hours, which is currently operating at unacceptable LOS F. This Tier 3 impact is also mitigated with the payment of county and TAMC fees. However, the impact is still considered significant and unavoidable, as there are currently no definitive plans to improvement SR 68 operations to an acceptable level of service.
C-1.4 Not withstanding Policy C-1.3, projects that are found to result in reducing a County road below the acceptable LOS standard shall not be allowed to proceed unless the construction of the development and its associated improvements are phased in a manner that will maintain the acceptable LOS for all affected County roads. Where the LOS of a County road impacted by a specific project currently operates below LOS D and is listed on the CIFP as a high priority, Policy C-1.3 shall apply. Where the LOS of a County road impacted by a specific project currently operates below LOS D and is not listed on the CIFP as a high priority, development shall mitigate project impacts concurrently. The following are exempt from this Policy except that they shall be required to pay any applicable fair share fee pursuant to Policies C-1.8, C-1.11, and /or other applicable traffic fee programs: a. first single family dwelling on a lot of record; b. allowable non-habitable accessory structures on an existing lot of record; c. accessory units consistent with other policies and State Second Unit Housing law; d. Any use in a non-residential designation for which a discretionary permit is not required or for which the traffic generated is equivalent to no more than that generated by a single family residence (10 ADT); and e. Minimal use on a vacant lot in a non-residential designation sufficient to enable the owner to derive some economically viable use of the parcel.	Consistent	According to the traffic report, and as discussed in C-1.3 above, the project would not result in reducing a county road below the acceptable LOS standard.
C-1.11 In addition to the County Traffic Impact Fee established in Policy C-1.8, the County shall require new development to pay a Regional Traffic Impact Fee developed collaboratively between TAMC, the County, and other local and state agencies to ensure a funding mechanism for regional transportation improvements mitigating Traffic Tier 3 impacts.	Consistent.	As described above under General Plan policy C-1.3, the project would be required to pay the appropriate Regional Traffic Impact Fee to mitigate for the project's share of the necessary improvements the SR 68 intersections with Reservation Road and River Road. These Tier 2 impacts would be mitigated though the payment of these impact fees.

	Consistency	Discussion
C-2.7 New development shall be located and designed with convenient access and efficient transportation for all intended users and, where possible, consider alternative transportation modes.	Consistent	Monterey-Salinas Transit does not serve development along River Road. The applicants propose shuttle services for residents to access areas on the Monterey Peninsula and Salinas, including regular shuttle service for employees to transportation hubs nearby. The nearest MST bus stop is located at Creekside Terrace and Reservation Road, approximate 1.1 miles from the entrance to the project site. With implementation of the applicant-proposed shuttle service, the project would be consistent with this policy.
C-3.4 Strategies to encourage travel in non-peak hours shall be supported.	Consistent	The project includes a mitigation measure to schedule shift changes outside of morning and evening peak commute hours.
C-3.5 Transportation alternatives such as bicycles, car pools, public transit, and compact vehicles shall be encouraged and accommodated within and outside the public right-of-way and may be included as part of an Area Plan and also in Policy OS-1.10.	Consistent	See discussion of Policy C-2.7 above.
Conservation and Open Space		
OS-1.2 Development in designated visually sensitive areas shall be subordinate to the natural features of the area.	Consistent	The project site is located within an area designated "sensitive viewshed." Section 5.0, *Aesthetics,* of the Draft SEIR included visual simulations from SR 68 and from Reservation Road. The simulations show that although the project would be visible from these locations, the project is not located on steeper slopes and would not constitute ridgeline development. Mitigation measures ensuring the adverse impact is less than significant are: 1) requiring a landscape plan to screen the project site from SR 68, Reservation Road, and River Road, as well as from the adjacent neighborhood and trail; 2) building colors and materials to be earth toned to blend with the existing vicinity landscape; and 3) requiring all new utility and distribution lines on the project site to be underground.
OS-1.3 To preserve the County's scenic qualities, ridgeline development shall not be allowed. An exception to this policy may be made only after publicly noticed hearing and provided the following findings can be made: a. The ridgeline development will not create a substantially adverse visual impact when viewed from a common public viewing area; and either, b. The proposed development better achieves the goals, policies and objectives of the Monterey County General Plan and applicable area plan than other development alternatives; or, c. There is no feasible alternative to the ridgeline development. Pursuant to Policy OS-1.6, in areas subject to specific plans, the ridgeline policies and regulations of the applicable specific plan shall govern.	Consistent	See discussion of Policy OS-1.2 above. The proposed project would not result in ridgeline development.

	Consistency	Discussion
OS-1.6 In areas subject to specific plans, the ridgeline policies and regulations of the applicable specific plan shall govern. Each specific plan shall address viewshed issues, including ridgeline development, as part of the plan, including, but not limited to, provisions for setbacks, landscaping, height limits, or open space buffers.	Consistent	See discussion of Policy OS-1.2 above, as well as the specific plan policy discussions presented earlier. The proposed project would not result in ridgeline development.
OS-1-9 Development that protects and enhances the County's scenic qualities shall be encouraged.	Consistent	See discussion of Policy OS-1.2 above.
OS-1.12 The significant disruption of views from designated scenic routes shall be mitigated through use of appropriate materials, scale, lighting and siting of development	Consistent	See discussion of Policy OS-1.2 above.
OS-3.5 The County shall regulate activity on slopes to reduce impacts to water quality and biological resources: 1) Non-Agricultural. a) Development on slopes in excess of twenty five percent (25%) shall be prohibited except as stated below; however, such development may be allowed pursuant to a discretionary permit if one or both of the following findings are made, based upon substantial evidence: 1. there is no feasible alternative which would allow development to occur on slopes of less than 25%; 2. the proposed development better achieves the resource protection objectives and policies contained in the Monterey County General Plan, accompanying Area Plans, and all applicable master plans. b) Development on slopes greater than 25% or that contain geologic hazards and constraints shown on the County's GIS Geologic (Policy S-1.2) or Hydrologic (Policy PS-2.6) Hazard Databases shall require adequate special erosion control and construction techniques and the discretionary permit shall: 1. evaluate possible building site alternatives that better meet the goals and policies of the general plan; 2. identify development and design techniques for erosion control, slope stabilization, visual mitigation, drainage, and construction techniques; and 3. minimize development in areas where potentially unstable slopes, soil and geologic conditions, or sewage disposal pose substantial risk to public health or safety. c) Where proposed development impacting slopes in excess of twenty five percent (25%) does not exceed ten percent (10%), or 500 square feet of the total development footprint (whichever is less), a discretionary permit shall not be required.	Consistent	According to a slope map exhibit prepared by Gateway Engineering for the applicant, the project site area has approximately 0.6 acres with slopes greater than 25 percent, which represents 7.5 percent of the proposed eight-acre development area of project site. A portion of the upper loop road and portions of four casitas are on slopes over 25 percent. This area generally consists of non-native grasslands (see Section 7.0, *Biological Resources* of the Draft SEIR) and no significant biological resources were identified in this area. The loop road is essential to fire protection and project circulation. It may be possible to relocate some of the casitas units but that would may require they be placed closer to the homes in Las Palmas #1 and would result in potential loss of privacy to those homes. Relocation would also result in result in additional grading for fire department access, parking areas, and would elevate a number of the casitas units on the site which could increase visibility. Because there is no feasible alternative to completely avoid the 25% slopes and because the project achieves the resource protection objectives and policies contained in the Monterey County General Plan, accompanying Area Plans, and all applicable master plans, findings for a discretionary permit can be made and the project would be considered consistent with this policy.

	Consistency	Discussion
d) It is the general policy of the County to require dedication of a scenic easement on a slope exceeding twenty five percent (25%).		
OS-5.4 Development shall avoid, minimize, and mitigate impacts to listed species and critical habitat to the extent feasible. Measures may include but are not limited to: a. clustering lots for development to avoid critical habitat areas, b. dedications of permanent conservation easements; or c. other appropriate means. If development may affect listed species, consultation with United States Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG) may be required and impacts may be mitigated by expanding the resource elsewhere on-site or within close proximity off-site. Final mitigation requirements would be determined as required by law.	Consistent	The project site does not contain habitat for listed species and is not designated critical habitat. However, the project site does contain habitat for several plant and wildlife species of special concern. Potential plant species include Congdon's tarplant, fragrant fritillary, Hickman's onion, Hutchinson's larkspur, and Santa Cruz microseris. Potential wildlife species include American badger, burrowing owl, Monterey dusky-footed woodrat, hoary bat, western red bat, nesting raptors, and migratory birds. Several pre-construction mitigation measures are presented in Section 7.0, *Biological Resources,* of the Draft SEIR that would reduce potential impacts to these plant and wildlife species should they occur on the project site prior to construction activities.
OS-5.5 Landowners and developers shall be encouraged to preserve the integrity of existing terrain and native vegetation in visually sensitive areas such as hillsides, ridges, and watersheds. Routine and Ongoing Agricultural Activities shall be exempt from this policy.	Consistent	The project site is located within an area designated "sensitive viewshed." Approximately 27.6 percent of the project site is proposed for development. The balance will be retained in open space. According to Section 7.0, *Biological Resources,* of the Draft SEIR, most of the site supports non-native grassland and other prevalent non-native species. Various native wildflowers and other herbaceous plants occur seasonally in the grassland habitat at low densities. Scattered native shrubs are also present in some areas. Mature native coast live oaks are present on the hillsides outside the development area. The proposed project includes the removal of approximately 40 non-native eucalyptus trees, retains other non-native eucalyptus trees, and does not include removal of native oak trees.
OS-5.10 Regulations for tree removal, including Timberland Conversion, shall be established and maintained by ordinance, implementing Area Plan policies that address the following: a. Criteria when a permit is required including: 1. number of trees, 2. minimum size of tree, 3. Post Timberland conversion land-use b. How size is measured for each protected species of tree, and what constitutes a landmark tree depending on the rate of growth for that species. c. Hazardous trees d. Pest and disease abatement e. Replacement criteria	Consistent	The only trees proposed for removal are non-native eucalyptus trees, which are not a protected species of tree. No County-regulated native trees are proposed for removal.

	Consistency	Discussion
f. Ensure minimal removal		
OS-5.16 A biological study shall be required for any development project requiring a discretionary permit and having the potential to 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, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.	Consistent	The applicant prepared biological studies (Regan Biological and Horticultural Consulting December 2011 and October 2013) and the Draft SEIR consultant EMC Planning Group biologist reviewed those studies, conducted a site visit, and prepared an independent analysis that is included in Section 7.0, *Biological Resources,* of the Draft SEIR. However, the project site does contain habitat for several plant and wildlife species of special concern which could be adversely affected by development of the project. Potential plant species include Congdon's tarplant, fragrant fritillary, Hickman's onion, Hutchinson's larkspur, and Santa Cruz microseris. Potential wildlife species include American badger, burrowing owl, Monterey dusky-footed woodrat, hoary bat, western red bat, nesting raptors, and migratory birds. Several pre-construction mitigation measures are presented in Section 7.0, *Biological Resources,* of the Draft SEIR, that would reduce potential impacts to these plant and wildlife species should they occur on the project site prior to construction activities. Therefore, the proposed project does not have the potential to 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, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.
OS-5.24 The County shall require discretionary projects to retain movement corridors of adequate size and habitat quality to allow for continued wildlife use based on the needs of the species occupying the habitat. The County shall require that expansion of its roadways and public infrastructure projects provide movement opportunities for terrestrial wildlife and ensure that existing stream channels and riparian corridors continue to provide for wildlife movement and access.	Consistent	The proposed project would impede to a limited degree the local movement of common wildlife due to habitat loss. However, the site does not function as a regional wildlife movement corridor or habitat linkage, and therefore, the proposed project would not disrupt movement corridors to allow for continued wildlife use in the vicinity.
OS-5.25 Occupied nests of statutorily protected migratory birds and raptors shall not be disturbed during the breeding season (generally February 1 to September 15). The county shall A. Consult, or require the developer to consult, with a qualified biologist prior to any site preparation or construction work in order to: (1) determine whether work is proposed during nesting season for migratory birds or raptors, (2) determine whether site vegetation is suitable to nesting migratory birds or raptors, (3) identify any regulatory requirements for setbacks or other avoidance	Consistent.	An evaluation of potential impacts to nesting birds and raptors is included in Section 7.0, *Biological Resources,* of the Draft SEIR. Mitigation measure BIO-6 requires pre-construction surveys if any construction-related activities will take place during the nesting bird season.

	Consistency	Discussion
measures for migratory birds and raptors which could nest on the site, and (4) establish project-specific requirements for setbacks, lock-out periods, or other methods of avoidance of disruption of nesting birds. B. Require the development to follow the recommendations of the biologist. This measure may be implemented in one of two ways: (1) preconstruction surveys may be conducted to identify active nests and, if found, adequate buffers shall be provided to avoid active nest disruption until after the young have fledged; or (2) vegetation removal may be conducted during the non-breeding season (generally September 16 to January 31); however, removal of vegetation along waterways shall require approval of all appropriate local, state, and federal agencies. This policy shall not apply in the case of an emergency fire event requiring tree removal. This policy shall apply for tree removal that addresses fire safety planning, since removal can be scheduled to reduce impacts to migratory birds and raptors.		
OS-6.4 Development proposed in low sensitivity zones are not required to have an archaeological survey unless there is specific additional information that suggests archaeological resources are present.	Consistent	According to the Monterey County General Plan Archaeological Sensitivity Map, the project site is located in an area of low archaeological sensitivity; thus, the likelihood of resources being present on the project site is low. Therefore, no archaeological survey was conducted for the project site.
OS-9.1 The use of solar, wind and other renewable resources for agricultural, residential, commercial, industrial, and public building applications shall be encouraged.	Consistent	The project would be required to comply with all applicable County ordinances and the current California Building Code in affect at the time the project is constructed. The Energy Conservation policies of the Las Palmas Ranch Specific Plan require the use of renewable energy. While the proposed project does not include the use of solar, wind, or other renewable resources, Section 12.0, *Energy*, the Draft SEIR includes a mitigation measure requiring the developer to demonstrate consistency with these energy conservation policies prior to issuance of building permits.
OS-10.2 Mass transit, bicycles, pedestrian modes of transportation, and other transportation alternatives to automobiles shall be encouraged.	Consistent	Monterey-Salinas Transit does not serve development along River Road. The applicants propose shuttle services for residents to access areas on the Monterey Peninsula and Salinas, including regular shuttle service for employees to transportation hubs nearby. The nearest MST bus stop is located at Creekside Terrace and Reservation Road, approximately 1.1 miles from the entrance to the project site. With implementation of the shuttle service, the project would be consistent with this policy.

	Consistency	Discussion
OS-10.9 The County of Monterey shall require that future development implement applicable Monterey Bay Unified Air Pollution Control District control measures. Applicants for discretionary projects shall work with the Monterey Bay Unified Air Pollution Control District to incorporate feasible measures that assure that health-based standards for diesel particulate emissions are met. The County of Monterey will require that future construction operate and implement MBUAPCD PM_{10} control measures to ensure that construction-related PM_{10} emissions do not exceed the MBUAPCD's daily threshold for PM_{10}. The County shall implement MBUAPCD measures to address off-road mobile source and heavy duty equipment emissions as conditions of approval for future development to ensure that construction-related NO_x emissions from non-typical construction equipment do not exceed the MBUAPCD's daily threshold for NO_x.	Consistent	A mitigation measure presented in Section 6.0, *Air Quality,* the Draft SEIR requires the developer to maintain and properly tune all off-road construction vehicles and equipment in accordance with the manufacturer's specifications and to implement several measures to ensure that construction-related NO_x and PM_{10} emissions are less than significant.
Safety		
S-1.1 Land uses shall be sited and measures applied to reduce the potential for loss of life, injury, property damage, and economic and social dislocations resulting from ground shaking, liquefaction, landslides, and other geologic hazards in the high and moderate hazard susceptibility areas.	Consistent	According to the geologic hazards report and soil engineering feasibility investigation prepared for the project (Landset Engineers 2014), 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. 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 a condition of project approval, all recommendations in the report would be required.
S-1.3 Site-specific geologic studies may be used to verify the presence or absence and extent of the hazard on the property proposed for new development and to identify mitigation measures for any development proposed. An ordinance including permit requirements relative to the siting and design of structures and grading relative to seismic hazards shall be established.	Consistent	See discussion of Policy S-1.1 above.
S-1.7 Site-specific reports addressing geologic hazard and geotechnical conditions shall be required as part of the planning phase and review of discretionary development entitlements and as part of review of ministerial permits in accordance with the California Building Standards Code as follows: a. Geotechnical reports prepared by State of California licensed Registered Geotechnical Engineers are required during building plan review for all habitable structures and habitable additions over 500 square feet in footprint area. Additions less than 500 square feet and non-habitable buildings may require geotechnical reports as determined by the pre-site inspection. b. A Registered Geotechnical Engineer shall be required to review and approve the foundation conditions prior to plan check approval, and if recommended by the	Consistent	See discussion of Policy S-1.1 above.

	Consistency	Discussion
report, shall perform a site inspection to verify the foundation prior to approval to pour the footings. Setbacks shall be identified and verified in the field prior to construction. c. All new development and subdivision applications in State- or County-designated Earthquake Fault Zones shall provide a geologic report addressing the potential for surface fault rupture and secondary fracturing adjacent to the fault zone before the application is considered complete. The report shall be prepared by a Registered Geologist or a Certified Engineering Geologist and conform to the State of California's most current Guidelines for evaluating the hazard of surface fault rupture. d. Geologic reports and supplemental geotechnical reports for foundation design shall be required in areas with moderate or high landslide or liquefaction susceptibility to evaluate the potential on- and off-site impacts on subdivision layouts, grading, or building structures. e. Where geologic reports with supplemental geotechnical reports determine that potential hazards effecting new development do not lead to an unacceptable level of risk to life and property, development in all Land Use Designations may be permissible, so long as all other applicable General Plan policies are complied with. f. Appropriate site-specific mitigation measures and mitigation monitoring to protect public health and safety, including deed restrictions, shall be required.		
S-1.8 As part of the planning phase and review of discretionary development entitlements, and as part of review of ministerial permits in accordance with the California Building Standards Code, new development may be approved only if it can be demonstrated that the site is physically suitable and the development will neither create nor significantly contribute to geologic instability or geologic hazards.	Consistent	See discussion of policy S-1.1 above.
S-3.1 Post-development, off-site peak flow drainage from the area being developed shall not be greater than pre-development peak flow drainage. On-site improvements or other methods for stormwater detention shall be required to maintain post-development, off-site, peak flows at no greater than predevelopment levels, where appropriate, as determined by the Monterey County Water Resources Agency.	Consistent	The proposed project design includes storm drainage facilities (collection, conveyance and disposal) as detailed in the stormwater control plan (Gateway Engineering 2017) to meet the generation of stormwater 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 stormwater flow. The stormwater control plan includes on-site stormwater control measures designed to achieve a no net increase in rate of stormwater 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.

	Consistency	Discussion
S-3.2 Best Management Practices to protect groundwater and surface water quality shall be incorporated into all development.	Consistent	The proposed project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Stormwater 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 stormwater runoff during construction.
S-3.9 In order to minimize urban runoff affecting water quality, the County shall require all future development within urban and suburban areas to implement Best Management Practices (BMPs) as approved in the Monterey Regional Stormwater Management Program which are designed to incorporate Low Impact Development techniques. BMPs may include, but are not limited to, grassy swales, rain gardens, bioretention cells, and tree box filters. BMPs should preserve as much native vegetation as feasible possible on the project site.	Consistent	See discussion of Policy S-3.2 above.
S-4.11 The County shall require all new development to be provided with automatic fire protection systems (such as fire breaks, fire-retardant building materials, automatic sprinkler systems, and/or water storage tanks) approved by the fire jurisdiction.	Consistent	The proposed project would be required to meet the minimum requirements in the Title 24 California Building Standards Code. Chapter 7, Fire and Smoke Protection Features and Chapter 9, Fire Protection Systems, address this requirement.
S-4.13 The County shall require all new development to have adequate water available for fire suppression. The water system shall comply with Monterey County Code Chapter 18.56, NFPA Standard 1142, or other nationally recognized standard. The fire authority having jurisdiction, the County Departments of Planning and Building Services, and all other regulatory agencies shall determine the adequacy and location of water supply and/or storage to be provided.	Consistent	The California Water Service Company performed a fire flow test on November 10, 2010. Required fire flow for the proposed project is 3,750 gallons per minute for a duration of three hours. The fire flow test concluded an available flow of up to 6,429 gallons per minute, meeting the requirement for adequate water available for fire suppression.
S-4.22 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, and other nationally recognized standards.	Consistent	The proposed project would be required to meet the state building code, state fire code, and Monterey County Code Chapter 18.56 as a condition of approval.
S-7.1 New noise-sensitive land uses may only be allowed in areas where existing (Figures 9 A-H) and projected (Figures 10 A-E) noise levels are "acceptable" according to "Land Use Compatibility for Community Noise Table" (Table S-2, next page). A Community Noise Ordinance shall be established consistent with said Table that addresses, but is not limited to the following (Noise level maps are located at the end of this Element): a. Capacity-related roadway improvement projects.	Consistent	Table S-2, Community Noise Exposure, identifies acceptable noise levels for various land use categories. The proposed project would fall under the "nursing home" category, which identifies 70 dB and below as normally acceptable. According to General Plan Figure 10C, Greater Monterey Peninsula, Carmel Valley and Toro Projected Noise Contours, the noise at the project site is below 60. Noise measurements conducted for the Final SEIR confirm that noise interior to the project site is below 60. Refer to Topical Response H in the Final SEIR for more information.

	Consistency	Discussion
b. Construction-related noise impacts on adjacent land uses. c. New residential land uses exposed to aircraft operations at any airport or air base. d. Site planning and project design techniques to achieve acceptable noise levels such as: building orientation, setbacks, earthen berms, and building construction practices. The use of masonry sound walls for noise control in rural areas shall be discouraged. e. Design elements necessary to mitigate significant adverse noise impacts on surrounding land uses. f. Impulse noise. g. Existing railroad locations & noise levels.		
S-7.10 Construction projects shall include the following standard noise protection measures: ▪ Construction shall occur only during times allowed by ordinance/code unless such limits are waived for public convenience; ▪ All equipment shall have properly operating mufflers; and ▪ Lay-down yards and semi-stationary equipment such as pumps or generators shall be located as far from noise-sensitive land uses as practical.	Consistent	Construction noise is quantified in Topical Response H of the Final SEIR. Adherence to construction noise restrictions in the Monterey County Code Chapter 10.60.40 and Monterey County General Plan Policies S-7.9 and S-7.10 would substantially reduce the exposure of sensitive receptors to temporary increases in construction noise, especially during sensitive evening and nighttime hours. As a condition of approval, the County would require that the project adhere to these General Plan policies to minimize construction noise. These requirements would reduce construction-related noise impacts to less than significant.
Public Services		
PS-2.3 New development shall be required to connect to existing water service providers where feasible. Connection to public utilities is preferable to other providers.	Consistent	The proposed project would connect to the existing Las Palmas system, operated by California American Water. California American Water has provided a "can and will serve" letter for the proposed project.
PS-2.8 The County shall require that all projects be designed to maintain or increase the site's pre-development absorption of rainfall (minimize runoff), and to recharge groundwater where appropriate. Implementation shall include standards that could regulate impervious surfaces, vary by project type, land use, soils and area characteristics, and provide for water impoundments (retention/detention structures), protecting and planting vegetation, use of permeable paving materials, bioswales, water gardens, and cisterns, and other measures to increase runoff retention, protect water quality, and enhance groundwater recharge.	Consistent	The proposed project design includes storm drainage facilities (collection, conveyance and disposal) as detailed in the stormwater control plan (Gateway Engineering 2017) to meet the generation of stormwater 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 stormwater flow. The stormwater control plan includes on-site stormwater control measures designed to achieve a no net increase in rate of stormwater 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. According to the 2010 General Plan Draft EIR (page 4.3-5), During spring and summer, the two reservoirs on the Nacimiento and San Antonio rivers regulate flow to minimize outflow to the ocean and maximize groundwater recharge through the Salinas River bed. Under current

	Consistency	Discussion
		reservoir operations, water is released into the river during summer to recharge groundwater in the basin. The proposed project will not affect the ability of groundwater recharge at the Salinas River. See also the discussion of Policy S-3.1 presented earlier.
PS-3.1 Except as specifically set forth below, new development for which a discretionary permit is required, and that will use or require the use of water, shall be prohibited without proof, based on specific findings and supported by evidence, that there is a long-term, sustainable water supply, both in quality and quantity to serve the development. This requirement shall not apply to: a) The first single family dwelling and non-habitable accessory uses on an existing lot of record; or b) Specified development (a list to be developed by ordinance) designed to provide: a) public infrastructure or b) private infrastructure that provides critical or necessary services to the public, and that will have a minor or insubstantial net use of water (e.g. water facilities, wastewater treatment facilities, road construction projects, recycling or solid waste transfer facilities; or c) Development within Zone 2C of the Salinas Valley groundwater basin, provided the County prepares or causes to be prepared a study for the Board of Supervisors regarding Zone 2C, to be completed no earlier than October 31, 2017 and no later than March 31, 2018 that does the following: d) Evaluates existing data for seawater intrusion and groundwater levels collected by Monterey County Water Resources Agency as of the date the study is commenced. e) Evaluates the total water demand for all existing uses and future uses designated in the General Plan EIR for the year 2030; f) Assesses and provides conclusions regarding the degree to which the total water demand for all uses designated in the General Plan for the year 2030 are likely to be reached or exceeded; g) Evaluates on an annual basis during the study period groundwater elevations and the seawater intrusion boundary; h) Based on historical data and the data produced by the study, evaluates and provides conclusions regarding future trends and any expected movement of groundwater elevations and the seawater intrusion boundary; i) Should the study conclude that i) total water demand for all uses designated in the General Plan for the year 2030 is likely to be exceeded; or ii) groundwater elevations are likely to decline by the year 2030 and iii) the seawater intrusion boundary is likely to advance inland by the year 2030, the study shall make recommendations on measures the County could take to address any or all of those conditions; and	Consistent	Water demand is evaluated in Section 10.0, *Water Supply,* of the Draft SEIR. The proposed project would have a water demand of approximately 11.4 acre feet per year (AFY). California Water Service, the water purveyor for the specific plan area, has provided a "can and will serve" for the proposed project. As presented in Table 10-2 in the Water Demand section, the 1982 EIR identified that buildout of Las Palmas Ranch would require 922 AFY. However, the Board of Supervisors modified the proposed specific plan, and the adopted specific plan required on 599 AFY. Actual water use at Las Palmas is estimated to be about 182 AFY. Therefore, with the addition of the proposed project, the total water use at Las Palmas is expected to be about 193.4 AFY, significantly less that what was allowed by the adopted specific plan. The first component of policy PS-3.1 is the requirement to provide proof of a sustainable water supply to serve the development. Policy PS-3.1 includes an exception to development in Zone 2C of the Salinas Valley groundwater basin, which would include the proposed project. Instead the provisions of subsection c. of the policy are applicable. Subsection c. requires the County to conduct a specific study on Zone 2C, conduct a hearing on the study results, adopt measures to address identified conditions, and prepare a report every 5 years on the results of any measures. The requisite study and related actions have not been conducted. Subsection c. further provides, "This exception for Zone 2C shall be a rebuttable presumption that a Long Term Sustainable Water Supply exists within Zone 2C, and the presumption shall remain in effect until and unless the study reaches the conclusion for Zone 2C identified in subsection 6) i or 6) ii and 6) iii. Development in Zone 2C shall be subject to all other policies of the General Plan and applicable Area Plan. Based on these considerations, the project is consistent with Policy PS-3.1, and the availability of a long-term water supply will be further discussion in conjunction with other policies below.

	Consistency	Discussion
j) Addresses such other matters as the Board of Supervisors determines are appropriate. Within two months following the completion of the study, the Board of Supervisors shall hold an open and noticed public hearing on the results of the study. If the study reaches the conclusions for Zone 2C identified in subsection 6) i or 6) ii and 6) iii, the Board of Supervisors shall adopt one or more measures identified in the study, or other appropriate measures, to address the identified conditions. This exception for Zone 2C shall be a rebuttable presumption that a Long Term Sustainable Water Supply exists within Zone 2C, and the presumption shall remain in effect until and unless the study reaches the conclusion for Zone 2C identified in subsection 6) i or 6) ii and 6) iii. Development in Zone 2C shall be subject to all other policies of the General Plan and applicable Area Plan. Following completion of the study described herein, and the adoption of measures as may be recommended in the study, if any, the County shall prepare a report to the Board of Supervisors every five (5) years for Zone 2C that examines the degree to which a) total water demand for all uses predicted in the General Plan EIR for year 2030 will be reached; or b) groundwater elevations, the seawater intrusion boundary have changed since the prior reporting period; and c) other sources of water supply are available.		
PS-3.2 Specific criteria for proof of a Long Term Sustainable Water Supply and an Adequate Water Supply System for new development requiring a discretionary permit, including but not limited to residential or commercial subdivisions, shall be developed by ordinance with the advice of the General Manager of the Water Resources Agency and the Director of the Environmental Health Bureau. A determination of a Long Term Sustainable Water Supply shall be made upon the advice of the General Manager of the Water Resources Agency. The following factors shall be used in developing the criteria for proof of a long term sustainable water supply and an adequate water supply system: a. Water quality; b. Authorized production capacity of a facility operating pursuant to a permit from a regulatory agency, production capability, and any adverse effect on the economic extraction of water or other effect on wells in the immediate vicinity, including recovery rates; c. Technical, managerial, and financial capability of the water purveyor or water system operator; d. The source of the water supply and the nature of the right(s) to water from the source; e. Cumulative impacts of existing and projected future demand for water from the source, and the ability to reverse trends contributing to an overdraft condition	Consistent	This policy provides guidance and criteria for the development of a County ordinance outlining the requirements for proof of a long term sustainable water supply and an adequate water supply system for new development requiring a discretionary permit. Thus, this policy is relevant to development of an ordinance that could be applied to the proposed. Nonetheless, this project is reviewed below applying these criteria: ▪ Water is the same quality as current local California Water Service wells and is thus, of acceptable water quality. ▪ The analysis in the Draft SEIR (Section 10.0, *Water Supply*, p. 10-11) shows that the project would use 11.4 acre-feet of water per year (AFY), approved Specific Plan anticipated uses associated with 599-AFY, and is using only 182 AFY. With consideration of the proposed project, total water use in the entire Specific Plan Area would be 194 AFY. In addition, common area landscape irrigation would use recycled water, resulting in less than 11.4 AFY of potable water demand. The project water would demand represents a 0.002 percent increase in the annual groundwater extraction for Zone 2C. California Water Service has confirmed that it can and will serve the project, which indicates the applicable water purveyor for the site is able to provide water supply for the proposed project. See updated will-serve letter from California Water Service dated March 26, 2019 in Appendix I-2.

	Consistency	Discussion
or otherwise affecting supply; and f. Effects of additional extraction or diversion of water on the environment including on in-stream flows necessary to support riparian vegetation, wetlands, fish or other aquatic life, and the migration potential for steelhead, for the purpose of minimizing impacts on the environment and to those resources and species. g. Completion and operation of new projects, or implementation of best practices, to renew or sustain aquifer or basin functions. The hauling of water shall not be a factor nor a criterion for the proof of a long term sustainable water supply.		▪ California Water Service has demonstrated its technical, managerial and financial capabilities to deliver water. ▪ Potable water would be provided by California Water Service via its entitlements detailed in the Draft SEIR (Section 10.0, *Water Supply*, p. 10-1). In addition, the property has rights to 2.5 acre-feet of reclaimed water which would further offset demand on potable water. ▪ As indicated in the Draft SEIR (Section 10.0, *Water Supply*, pp. 10-11 to 10-12), the project would increase potable water demand by up to 11.4 AFY. The "can and will" service letter provided by California Water Service for the proposed project indicates the applicable water purveyor for the site is able to provide water supply for the proposed project based on its existing facilities. ▪ The project does not involve any extraction or diversion of water but would utilize California Water Service water and recycled water associated with existing entitlements. In addition, the project would utilize water efficiency methods including water efficient fixtures, low-water use landscaping, and principles of low impact development in design to manage stormwater and emulate pre-development hydrologic conditions. ▪ The project would not adversely affect aquifer or basin functions and would not hinder other efforts to renew aquifer or basin functions. ▪ The project would not involve any hauling of water. Therefore, substantial evidence related to proof of a sustainable water supply for the project includes the analysis and references in the Draft SEIR, including Section 10.0, *Water Supply*, the Cal Water will-serve letter include in Draft SEIR Appendix E, the updated will-serve letter attached herein (see Appendix I-2), the previous EIR for the Plan Area, and discussion and analysis in this response to comments/Final SEIR. The project is consistent with Policy PS-3.2.
PS-4.5 New development proposed in the service area of existing wastewater collection, treatment, and disposal facilities shall seek service from those facilities unless it is clearly demonstrated that the connection to the existing facility is not feasible.	Consistent	The California American Water Company has provided a "can and will serve" letter to for the proposed project, confirming the availability of wastewater treatment accommodation.
PS-5.4 The maximum use of solid waste source reduction, reuse, recycling, composting, and environmentally-safe transformation of wastes, consistent with the protection of the public's health and safety, shall be promoted.	Consistent	The proposed project will be served by the Salinas Valley Solid Waste Authority, which includes and promotes a recycling and waste reduction program consistent with state solid waste diversion regulations.

	Consistency	Discussion
PS-8.1 Programs that provide a full range of health care from local and regional health care programs for Monterey County residents, including preventive care, primary care, hospitals, and long-term care services, shall be promoted.	Consistent	The proposed project is a continuum of care residential community designed to provide care to seniors over the age of 55 and to persons with diminishing mental capacity due to Alzheimer's, dementia, or similar causes.
PS-8.2 Programs to promote access to health care and support the establishment of needed health care services in areas with high population concentrations, such as cities, Community Areas, and Rural Centers, shall be supported. Where services do not exist, medical transportation programs to address the unmet transportation needs of residents shall be coordinated with the Transportation Agency of Monterey County.	Consistent	See discussion of Policy PS-8.1 above. Although the proposed project is not located in a city, Community Area, or Rural Center, it is located in the Las Palmas Ranch community, one mile driving distance from SR 68 and 3.5 miles driving distance from west Salinas. Salinas Valley Memorial Hospital is located about 4.75 miles driving distance from the project site.
PS-9.4 The County shall promote meeting the needs of the elderly and establish adult day care facilities or other services that maintain older persons in an independent setting.	Consistent	See the discussion of Policy PS-8.1 and Policy PS-8.2 above.
PS-13.2 All new utility lines shall be placed underground, unless determined not to be feasible by the Director of the Resource Management Agency.	Consistent	A mitigation measure located in Section 5.0, *Aesthetics,* of the Draft SEIR requires all new utility and distribution lines to be placed underground.
Toro Area Plan Supplemental Policy		
Land Use		
T-1.5 Subdivisions shall be designed so that new lots have building sites located outside of the critical viewshed.	Not applicable.	The project is not located with the area designated "critical viewshed." It is located with an area designated "sensitive viewshed." Mitigation measures located in Section 5.0, *Aesthetics,* of the Draft SEIR would reduce the impact of the proposed project on viewsheds.
Circulation		
T-2.1 Employers in surrounding areas should be encouraged to stagger employees' work hours in order to ease peak hour traffic congestion on SR 68 and in other areas.	Consistent	The proposed project is projected to employ about 92 people when operating at maximum capacity. This will include managers and supervisors, trained care givers, chefs and facility maintenance personnel. There will be three shifts: morning, day, and evening. ▪ Morning Shift A (6:00 am to 2:00 pm): 15 employees ▪ Morning Shift B (7:00 am to 3:00 pm): 20 employees ▪ Day Shift A (8:00 am to 4:00 pm): 12 employees ▪ Day Shift B (10:30 am to 6:30 pm): 21 employees ▪ Evening Shift A (3:30 pm to 11:30 pm): 12 employees ▪ Evening Shift B (11:30 pm am to 6:30 am pm): 12 employees As a mitigation proposed by the applicant, shifts will be staggered to minimize peak hour trips on SR 68.

	Consistency	Discussion
T-2.5 Fair-share financial contributions from each new development in the Toro Planning Area shall be required to expedite funding and construction of SR 68 improvements.	Consistent	Funding provided by existing development at Las Palmas Ranch was used for construction of SR 68 improvements, including improving a portion of River Road to four lanes, traffic signals and additional improvements at other River Road intersections. As a condition of project approval for the proposed project, the applicant would be required to pay the Monterey County countywide traffic impact fee and the TAMC regional development impact fee to mitigate for the project's fair share of cumulative traffic impacts throughout the County, which may include additional improvements to SR 68.
T-2.9 If new sites for office, employment, services, and local conveniences are found to be appropriate, such sites should incorporate designs to allow use of alternate modes of transportation.	Consistent	Monterey-Salinas Transit does not serve development along River Road. The applicants propose shuttle services for residents to access areas on the Monterey Peninsula and Salinas, including regular shuttle service for employees to transportation hubs nearby. The nearest MST bus stop is located at Creekside Terrace and Reservation Road, approximate 1.1 miles from the entrance to the project site.
Conservation/Open Space		
T-3.1 Within areas designated as "visually sensitive" on the Toro Scenic Highway Corridors and Visual Sensitivity Map (Figure 16), landscaping or new development may be permitted if the development is located and designed (building design, exterior lighting, and siting) in such a manner that will enhance the scenic value of the area. Architectural design consistent with the rural nature of the Plan area shall be encouraged.	Consistent	The project site is located within an area designated "sensitive viewshed." Section 5.0*, Aesthetics,* of the Draft SEIR included visual simulations from SR 68 and from Reservation Road. The simulations show that although the project would be visible from these locations, the project is not located on steeper slopes and will not constitute ridgeline development. Mitigation measures ensuring the adverse impact is less than significant are: 1) requiring a landscape plan to screen the project site from SR 68, Reservation Road, and River Road, as well as from the adjacent neighborhood and trail; 2) building colors and materials to be earth toned to blend with the existing vicinity landscape; and 3) requiring all new utility and distribution lines on the project site to be underground.
T-3.2 Land use, architectural, and landscaping controls shall be applied, and sensitive site design encouraged, to preserve Toro's visually sensitive areas and scenic entrances: a. River Road/SR 68 intersection b. Laureles Grade scenic vista overlooking the Planning Area	Consistent	See discussion of Policy T-3.1 above. Landscaping for the proposed project includes mostly native plants designed to preserve and enhance the natural landscape of the project site. Non-native plants included in the Landscape Plan are: magnolia tree, source magnolia, Japanese maple, western red bud, European white birch, pheasant tail grass, silver grass, Australian fuchsia, bunny tail grass, and Pacific coast iris.
T-3.4 Placement of existing utility lines underground shall be encouraged, particularly along Laureles Grade Road, Corral de Tierra, San Benancio, River Road, and SR 68.	Consistent	See discussion of General Plan Policy 13.2 above.

	Consistency	Discussion
T-3.5 Exterior/outdoor lighting shall be located, designed, and enforced to minimize light sources and preserve the quality of darkness. Street lighting shall be as unobtrusive as practicable and shall be consistent in intensity throughout the Toro area.	Consistent	Section 5.0, *Aesthetics,* of the Draft SEIR concluded that the proposed project could have an adverse lighting effect. With implementation of Mitigation Measure AES-4, which requires all exterior lighting to be unobtrusive, down-lit, harmonious with the local area, and constructed or located sot that only the intended area is illuminated and off-site glare is fully controlled, lighting impacts would be less than significant and the proposed project would be consistent with this policy.
T-3.7 Removal of healthy, native oak trees in the Toro Planning Area shall be discouraged. An ordinance shall be developed to identify required procedures for removal of these trees. Said ordinance shall take into account fuel modification needed for fire prevention in the vicinity of structures and shall include: a. Permit requirements. b. Replacement criteria c. Exceptions for emergencies and governmental agencies	Consistent	The proposed project does not include removal of oak trees.
Public Services		
T-5.1 To ensure cost-effective and adequate levels of wastewater treatment, the County shall promote relatively higher densities in areas where wastewater treatment facilities can be made available.	Consistent	The proposed project would connect to the Las Palmas Wastewater Treatment Plant, operated by California American Water Company. As presented in the Draft SEIR, there is sufficient capacity to serve the project and the wastewater provider has supplied a “can and will serve” letter for the project.

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Appendix H

April 2017 Botanical Survey

Dale Ellis
Anthony Lombardo and Associates
A Professional Corporation
144 West Gabilan
Salinas, CA 93901

RE: Follow up survey based on DEIR for Shingu Senior Living Housing Project

Dear Dale,
At your request, I visited the property at APN 139-211-035 above River Road in Salinas on April 20, 2017, to conduct a spring botanical survey for five plants that are on database lists as occurring or documented in the past for the Spreckels Quadrant of the USGS. (Congdons tarweed , Fragrant Friltillary , Hickmans onion, Hutchinson's larkspur and Santa Cruz microseris) These 5 species are all Spring or Summer bloomers and would not have been easily found or identifiable during surveys I conducted in the past or those that EMC planning group conducted this past winter. Timing of this survey captured the appropriate season and optimal conditions for detecting flowering examples of 4 of these species and is still a bit early for the 5th species: Congdon's tarweed, were it to occur here.[1]

Based on observed flowering of 3 of the species (*Allium hickmanii, Fritillaria liliacea, Delphinium hutchinsoniae*) in other locations near Carmel and Carmel Highlands in the last two weeks it would be assumed that were those species to occur on the Shingu property they would be in flower and observable during my visit on April 20.
During my survey, I walked the entire perimeter of the property (excluding the steep lower slopes of the north side of the property that will not be impacted by the development) and then in transects from west to east and north to south through the middle of the site to allow observation of all areas with particular focus on topographical transition zones and edges of vegetation transition zones where soil conditions and aspect often influence what grows and dominates. The proposed development area was covered with a vegetative canopy n the high 90's to nearly 100% of which at least 90% was made up of nonnative annual and perennial grasses and forbs. There were small patches in some of the edge areas; along the slope top on the north end of the property where a handful of native species were scattered in the mosaic of nonnative weeds. Those native species included Pretty faces (*Triteleia ixioides*), Checker mallow (*Sedalia malviflora*), Blue dicks (*Dichelostema capitatum*), Common yarrow (*Achillea millefolium*), Blue-eyed grass (*Sisyrinchium bellum*), California buttercup (*Ranunculus californicus*) and Fiesta flower (*Pholistoma auritum*). These are some of our most widespread, common and persistent wildflowers (all perennials except for the Fiesta flower) that can be found in thoroughly disturbed habitats as well as healthy intact woodland and grasslands through much of California.
I did not find any of the 5 species that were being surveyed for. The habitat requirements of each of these 5 species are not met here on the Shingu property. The site has clearly been completely altered from its original natural plant community assemblage by historic livestock grazing, and land grading and clearing and planting with nonnative trees and shrubs for previous attempts to develop it. Again, save for some relatively low disturbed woodland habitat with Buckeye, Toyon and Oak on the steep north facing slope over River Road, there is no natural plant community habitat remaining on the property and thus no risk of impacts to any of those 5 species because of developing the Senior living facility.

[1] Congdons tarweed is documented in low swales and fields where rain water collects and even temporarily inundates these areas during the rainy season. It is associated with ponds and seasonally saturated grasslands, not sloping hillsides.

Results of April 21 Spring survey for 5 Special status Plant Species on Shingu Property at

Centromadia parryi ssp.*congdoni* Congdon's tarweed	June to October	Not found.	
Frilillaria liliacea Fragrant Friltillary	February to April	Not found.	
Allium hickmanii Hickmans onion	March to May	Not found	
Delphinium hutchinsoniae Hutchinson's larkspur	March to June	Not found	

Stebbinsoseris decipiens Santa Cruz microseris	April- May	Not found		

Incidentally, I did observe a couple snake species on the property that I had not seen during previous surveys. They are both common residents throughout the area but add to the known list of species documented for this property. The California King snake (*Lampropeltis californiae*) is found throughout most of the State of California except for the highest regions of the Sierra and far northeast California. It is a non-venomous snake, but powerful constrictor that hunts many species of rodents and other reptiles including rattlesnakes. This is not a special status species, but it is a good snake to have around!

The Monterey Ring-neck snake (*Diadophis punctatus vandenburghii*) a subspecies of the California ring-necked snake, is a small, secretive snake found throughout the Central coast region, usually found under the cover of rocks, wood, bark, boards and other surface debris, but occasionally seen moving on the surface on cloudy days, at dusk, or at night. These particular snakes were found under a sheet of plywood left on site near the top of the northerly north facing slope. While they do have a mild venom released from fangs in the rear of the mouth, it is only effective for small animals like salamanders, lizards, worms and slugs, that they can grip in their jaw long enough to drip the venom into the wounds.

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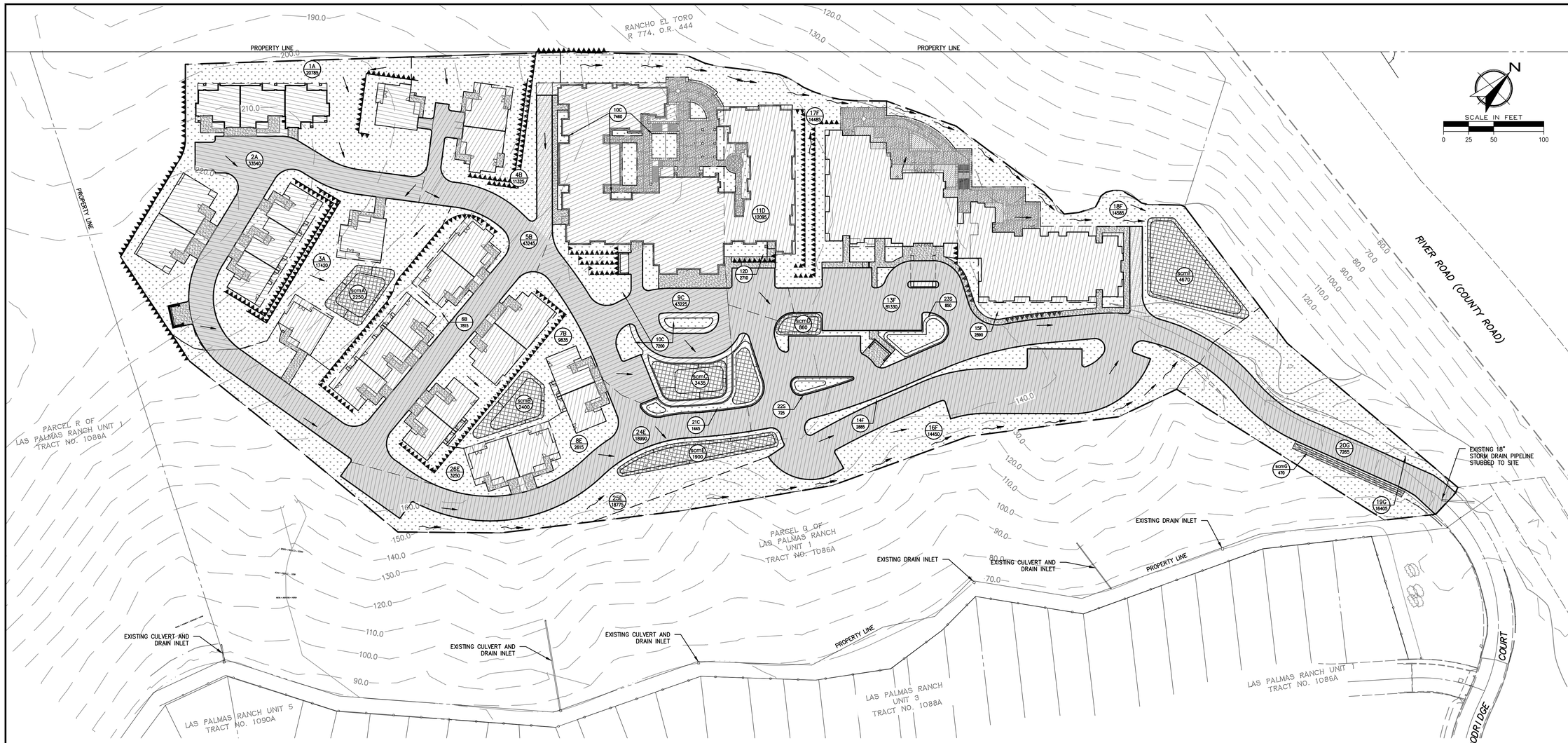
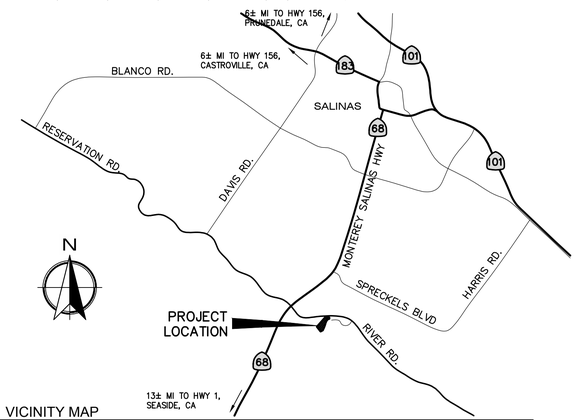
Appendix I-1

Conceptual Stormwater Control Plan



CONSTRUCTION LEGEND

SYMBOL	DESCRIPTION
XX / XXX	DRAINAGE MANAGEMENT AREA NAME / DRAINAGE AREA (SQUARE FEET)
	BOUNDARY OF SITE. LIMIT OF CONSTRUCTION AREA
	IMPERVIOUS AREA BOUNDARY
	LANDSCAPE AREA BOUNDARY
	3:1 MAX. SLOPE AREA FOR SCM
	PROPOSED IMPERVIOUS AREA (ROOF, PAVING, OR EQUAL)
	PROPOSED LANDSCAPING AREA
	PROPOSED BIORETENTION AREA



VICINITY MAP

NOT TO SCALE

NOTES

1. ABBREVIATION (S) = SELF RETAINING AREA
2. EACH DRAINAGE MANAGEMENT AREA NAME, HAS THE NAME OF THE OF THE STORMWATER MANAGEMENT CONTROL THAT IT DRAINS TO DIRECTLY AFTER THE NAME. E.G. DMA "14E" DRAINS TO SCM E.

BASIS OF BEARING

THE WEST LINE OF PARCELS 7 AND 13, AS SHOWN ON THE PARCEL MAP RECORDED IN VOLUME 17 OF PARCEL MAPS AT PAGE 140, MONTEREY COUNTY OFFICIAL RECORDS, TAKEN TO BE: NORTH 33° 41' 21" EAST

BASIS OF ELEVATION

NGS BENCHMARK PID: GU1981, DESIGNATION: GWM 27 USGS

FOUND BRASS DISK SET IN THE TOP OF A CONCRETE POST PROJECTING 0.2 FEET ABOVE THE GROUND, 0.8 MILES WEST OF ALONG RESERVATION ROAD FROM THE MONTEREY HIGHWAY, AT THE TOP OF A GRADE, 21.8 FEET EAST OF THE CENTERLINE OF THE ROAD, 2.6 FEET WEST OF A FENCE LINE AND 1.3 FEET SOUTH OF A METAL WITNESS POST.

ELEVATION = 211.15 FEET (NAVD'88 DATUM)

GATEWAY ENGINEERING, INC.
CIVIL ENGINEERS | LAND SURVEYORS
P: 559-320-0544 | F: 559-320-0545 | WWW.GATEWAYENG.COM
5811 EAST PRINCETON AVENUE, FRESNO, CA 93727-1327

REGISTERED PROFESSIONAL ENGINEER
DANIEL K. BOND
No. 57,133
EXP: 12/31/2017
Civil
STATE OF CALIFORNIA

RIVER VIEW AT LAS PALMAS
COUNTRY ROADS SENIOR LIVING
APN: 139-211-35
MONTEREY COUNTY, CA
CONCEPTUAL STORMWATER CONTROL PLAN

REV No.	DESCRIPTION	DATE

ENGINEER: D.BOND
LICENSE NO: 57,133
DRAWN BY: MW
CHECKED BY:
SCALE: AS SHOWN
PROJECT NO:
SHEET
SW1

COPYRIGHT 2015 BY GATEWAY ENGINEERING, INC. ALL RIGHTS RESERVED. THE FIRM OF GATEWAY ENGINEERING, INC. EXPRESSLY RESERVES ITS COMMON LAW COPYRIGHT AND OTHER APPLICABLE PROPERTY RIGHTS IN THESE PLANS. THESE PLANS ARE NOT TO BE REPRODUCED, CHANGED, OR COPIED IN ANY FORM OR MANNER WHATSOEVER, NOR ARE THEY TO BE ASSIGNED TO A THIRD PARTY WITHOUT FIRST OBTAINING THE WRITTEN PERMISSION AND CONSENT OF GATEWAY ENGINEERING, INC. IN THE EVENT OF UNAUTHORIZED REUSE OF THESE PLANS BY A THIRD PARTY, THE THIRD PARTY SHALL HOLD THE FIRM OF GATEWAY ENGINEERING, INC. HARMLESS, AND SHALL BEAR THE COST OF GATEWAY ENGINEERING, INC.'S LEGAL FEES ASSOCIATED WITH DEFENDING AND ENFORCING THESE RIGHTS.

11/29/2016 1:25 PM K:\GATEWAY PROJECTS\COUNTRY ROADS\LAS PALMAS\DRAWINGS\EXHIBITS\M_EXHIBIT\PCP-RIVER BOND

Appendix I-2

March 2019 California Water Service Can and Will Serve Letter

4318.001

CALIFORNIA WATER SERVICE
Salinas District 254 Commission Street
Salinas, CA 93901 *Tel:* (831) 757-3644

RECEIVED
MAR 29 2019
By

March 26, 2019

Dale Ellis
Anthony Lombardo & Associates
144 West Gabilan Street
Salinas, CA 93901

Will Serve Letter
Tract or Parcel Map No: ***Riverview at Las Palmas***
Developer: ***Anthony Lombardo & Associates***

Dear Mr. Ellis:

As a regulated utility, California Water Service Company Salinas district ("Cal Water") has an obligation to provide water service in accordance with the rules and regulations of the California Public Utility Commission (CPUC). Assuming you receive all required permits from the County of Monterey, Cal Water will provide water service to the above referenced project. Cal Water agrees to operate the water system and provide service in accordance with the rules and regulations of the California Public Utilities Commission (CPUC) and the company's approved tariffs on file with the CPUC. This will serve letter shall remain valid for **two years** from the date of this letter. If construction of the project has not commenced within this **two year** time frame, Cal Water will be under no further obligation to serve the project unless the developer receives an updated letter from Cal Water reconfirming our commitment to serve the above mentioned project. Additionally, Cal Water reserves the right to rescind this letter at any time in the event its water supply is severely reduced by legislative, regulatory or environmental actions.

Cal Water will provide such potable water at such pressure as may be available from time to time as a result of its normal operations per the company's tariffs on file with the CPUC. Installation of facilities through developer funding shall be made in accordance with the current rules and regulations of the CPUC including, among others, Tariff Rules 15 and 16 and General Order 103-A. In order for us to provide adequate water for domestic use as well as fire service protection, it may be necessary for the developer to fund the cost of special facilities, such as, but not limited to booster pumps and/or storage tanks, in addition to the cost of mains and services. Developer will also be required to contribute towards Cal Water's water supply by paying facilities fees on a per lot basis as described in Rule 15. Cal Water will provide more specific information regarding special facilities and fees after you provide us with your improvement plans, fire department requirements, and engineering fees for this project.

This letter shall at all times be subject to such changes or modifications by the CPUC as said Commission may, from time to time, require in the exercise of its jurisdiction.

If you have any questions regarding the above, please call me at (831) 757-3644.

Sincerely,

Brenda Granillo

Brenda Granillo
District Manager

cc: Michael Hurley – Cal Water Engineering Dept
File

Appendix J

Noise Modelling Results

- Freq Weight : A
- Time Weight : FAST
- Level Range : 40-100
- Max dB : 68.8 - 2020/06/25 11:16:47
- Level Range : 40-100
- SEL : 80.7
- Leq : 48.3
-

No.s	Date Time	(dB)
1	2020/06/25 11:05:26	41.9
2	2020/06/25 11:06:26	45.0
3	2020/06/25 11:07:26	50.0
4	2020/06/25 11:08:26	50.4
5	2020/06/25 11:09:26	43.8
6	2020/06/25 11:10:26	44.8
7	2020/06/25 11:11:26	50.8
8	2020/06/25 11:12:26	43.5
9	2020/06/25 11:13:26	45.0
10	2020/06/25 11:14:26	44.9
11	2020/06/25 11:15:26	45.7
12	2020/06/25 11:16:26	50.7
13	2020/06/25 11:17:26	44.9
14	2020/06/25 11:18:26	49.3
15	2020/06/25 11:19:26	50.3
16	2020/06/25 11:20:26	43.1
17	2020/06/25 11:21:26	43.5
18	2020/06/25 11:22:26	43.0
19	2020/06/25 11:23:26	44.1
20	2020/06/25 11:24:26	45.5
21	2020/06/25 11:25:26	44.6
22	2020/06/25 11:26:26	47.6
23	2020/06/25 11:27:26	44.3
24	2020/06/25 11:28:26	45.5
25	2020/06/25 11:29:26	46.1
26	2020/06/25 11:30:26	43.0
27	2020/06/25 11:31:26	44.6
28	2020/06/25 11:32:26	51.4
29	2020/06/25 11:33:26	44.8
30	2020/06/25 11:34:26	59.1

- Freq Weight : A
- Time Weight : FAST
- Level Range : 40-100
- Max dB : 72.3 - 2020/06/25 11:46:56
- Level Range : 40-100
- SEL : 77.4
- Leq : 46.7
-

No.s	Date Time	(dB)
1	2020/06/25 11:46:13	40.7
2	2020/06/25 11:47:13	37.0
3	2020/06/25 11:48:13	37.9
4	2020/06/25 11:49:13	37.5
5	2020/06/25 11:50:13	39.6
6	2020/06/25 11:51:13	46.8
7	2020/06/25 11:52:13	46.8
8	2020/06/25 11:53:13	52.6
9	2020/06/25 11:54:13	54.7
10	2020/06/25 11:55:13	44.4
11	2020/06/25 11:56:13	48.6
12	2020/06/25 11:57:13	53.3
13	2020/06/25 11:58:13	42.4
14	2020/06/25 11:59:13	42.7
15	2020/06/25 12:00:13	40.3
16	2020/06/25 12:01:13	47.8
17	2020/06/25 12:02:13	50.3
18	2020/06/25 12:03:13	47.3
19	2020/06/25 12:04:13	51.0
20	2020/06/25 12:05:13	42.2

- Freq Weight : A
- Time Weight : FAST
- Level Range : 40-100
- Max dB : 77.2 - 2020/06/25 12:31:45
- Level Range : 40-100
- SEL : 97.0
- Leq : 66.3
-

No.s	Date Time	(dB)
1	2020/06/25 12:13:51	61.8
2	2020/06/25 12:14:51	63.7
3	2020/06/25 12:15:51	56.3
4	2020/06/25 12:16:51	68.8
5	2020/06/25 12:17:51	66.1
6	2020/06/25 12:18:51	59.2
7	2020/06/25 12:19:51	52.9
8	2020/06/25 12:20:51	66.4
9	2020/06/25 12:21:51	55.4
10	2020/06/25 12:22:51	57.8
11	2020/06/25 12:23:51	62.4
12	2020/06/25 12:24:51	59.5
13	2020/06/25 12:25:51	61.4
14	2020/06/25 12:26:51	55.1
15	2020/06/25 12:27:51	68.4
16	2020/06/25 12:28:51	65.7
17	2020/06/25 12:29:51	68.0
18	2020/06/25 12:30:51	73.1
19	2020/06/25 12:31:51	65.5
20	2020/06/25 12:32:51	55.3

- Freq Weight : A
- Time Weight : FAST
- Level Range : 40-100
- Max dB : 86.0 - 2020/06/25 12:45:30
- Level Range : 40-100
- SEL : 97.8
- Leq : 67.1
-

No.s	Date Time	(dB)
1	2020/06/25 12:43:36	71.5
2	2020/06/25 12:44:36	74.4
3	2020/06/25 12:45:36	70.2
4	2020/06/25 12:46:36	56.9
5	2020/06/25 12:47:36	59.2
6	2020/06/25 12:48:36	66.6
7	2020/06/25 12:49:36	68.3
8	2020/06/25 12:50:36	61.8
9	2020/06/25 12:51:36	59.2
10	2020/06/25 12:52:36	63.5
11	2020/06/25 12:53:36	68.7
12	2020/06/25 12:54:36	57.9
13	2020/06/25 12:55:36	61.8
14	2020/06/25 12:56:36	52.9
15	2020/06/25 12:57:36	63.3
16	2020/06/25 12:58:36	60.1
17	2020/06/25 12:59:36	65.2
18	2020/06/25 13:00:36	69.2
19	2020/06/25 13:01:36	54.6
20	2020/06/25 13:02:36	58.1

- Freq Weight : A
- Time Weight : SLOW
- Level Range : 40-100
- Max dB : 92.5 - 2019/06/27 08:42:13
- Level Range : 40-100
- SEL : 119.3
- Leq : 70.0
-

No.s	Date Time	(dB)
1	2019/06/26 10:55:17	68.6
2	2019/06/26 10:59:17	64.0
3	2019/06/26 11:03:17	69.2
4	2019/06/26 11:07:17	65.8
5	2019/06/26 11:11:17	55.0
6	2019/06/26 11:15:17	65.1
7	2019/06/26 11:19:17	66.7
8	2019/06/26 11:23:17	63.0
9	2019/06/26 11:27:17	69.9
10	2019/06/26 11:31:17	57.4
11	2019/06/26 11:35:17	62.1
12	2019/06/26 11:39:17	71.4
13	2019/06/26 11:43:17	53.3
14	2019/06/26 11:47:17	57.4
15	2019/06/26 11:51:17	67.8
16	2019/06/26 11:55:17	71.1
17	2019/06/26 11:59:17	59.6
18	2019/06/26 12:03:17	62.9
19	2019/06/26 12:07:17	67.1
20	2019/06/26 12:11:17	69.3
21	2019/06/26 12:15:17	73.7
22	2019/06/26 12:19:17	71.5
23	2019/06/26 12:23:17	67.1
24	2019/06/26 12:27:17	68.4
25	2019/06/26 12:31:17	68.9
26	2019/06/26 12:35:17	66.8
27	2019/06/26 12:39:17	74.7
28	2019/06/26 12:43:17	75.5
29	2019/06/26 12:47:17	69.9
30	2019/06/26 12:51:17	64.1
31	2019/06/26 12:55:17	59.4
32	2019/06/26 12:59:17	60.8
33	2019/06/26 13:03:17	74.1
34	2019/06/26 13:07:17	70.7
35	2019/06/26 13:11:17	68.5
36	2019/06/26 13:15:17	62.3
37	2019/06/26 13:19:17	63.2
38	2019/06/26 13:23:17	71.0
39	2019/06/26 13:27:17	70.0
40	2019/06/26 13:31:17	63.0
41	2019/06/26 13:35:17	69.5
42	2019/06/26 13:39:17	71.1
43	2019/06/26 13:43:17	65.8
44	2019/06/26 13:47:17	70.9
45	2019/06/26 13:51:17	66.6
46	2019/06/26 13:55:17	70.5
47	2019/06/26 13:59:17	61.3
48	2019/06/26 14:03:17	67.6
49	2019/06/26 14:07:17	68.3
50	2019/06/26 14:11:17	66.4
51	2019/06/26 14:15:17	70.3
52	2019/06/26 14:19:17	62.1
53	2019/06/26 14:23:17	67.5
54	2019/06/26 14:27:17	64.6
55	2019/06/26 14:31:17	69.9
56	2019/06/26 14:35:17	65.4
57	2019/06/26 14:39:17	69.6
58	2019/06/26 14:43:17	68.2
59	2019/06/26 14:47:17	70.8
60	2019/06/26 14:51:17	59.5
61	2019/06/26 14:55:17	71.6
62	2019/06/26 14:59:17	59.5
63	2019/06/26 15:03:17	72.3
64	2019/06/26 15:07:17	72.5
65	2019/06/26 15:11:17	71.0
66	2019/06/26 15:15:17	59.5
67	2019/06/26 15:19:17	64.7
68	2019/06/26 15:23:17	56.9
69	2019/06/26 15:27:17	73.9
70	2019/06/26 15:31:17	73.2
71	2019/06/26 15:35:17	73.8
72	2019/06/26 15:39:17	68.1
73	2019/06/26 15:43:17	66.8
74	2019/06/26 15:47:17	62.7
75	2019/06/26 15:51:17	70.1
76	2019/06/26 15:55:17	70.0
77	2019/06/26 15:59:17	69.4
78	2019/06/26 16:03:17	71.1
79	2019/06/26 16:07:17	71.8
80	2019/06/26 16:11:17	67.0
81	2019/06/26 16:15:17	66.7
82	2019/06/26 16:19:17	73.2
83	2019/06/26 16:23:17	73.9
84	2019/06/26 16:27:17	72.1
85	2019/06/26 16:31:17	61.9

86	2019/06/26	16:35:17	61.0
87	2019/06/26	16:39:17	65.2
88	2019/06/26	16:43:17	66.4
89	2019/06/26	16:47:17	69.5
90	2019/06/26	16:51:17	62.8
91	2019/06/26	16:55:17	65.9
92	2019/06/26	16:59:17	64.6
93	2019/06/26	17:03:17	56.4
94	2019/06/26	17:07:17	70.6
95	2019/06/26	17:11:17	68.3
96	2019/06/26	17:15:17	63.3
97	2019/06/26	17:19:17	64.0
98	2019/06/26	17:23:17	69.0
99	2019/06/26	17:27:17	72.3
100	2019/06/26	17:31:17	71.9
101	2019/06/26	17:35:17	60.5
102	2019/06/26	17:39:17	67.8
103	2019/06/26	17:43:17	70.3
104	2019/06/26	17:47:17	69.4
105	2019/06/26	17:51:17	63.8
106	2019/06/26	17:55:17	71.8
107	2019/06/26	17:59:17	64.3
108	2019/06/26	18:03:17	70.6
109	2019/06/26	18:07:17	76.2
110	2019/06/26	18:11:17	65.7
111	2019/06/26	18:15:17	67.5
112	2019/06/26	18:19:17	57.9
113	2019/06/26	18:23:17	64.1
114	2019/06/26	18:27:17	51.4
115	2019/06/26	18:31:17	66.7
116	2019/06/26	18:35:17	55.5
117	2019/06/26	18:39:17	58.8
118	2019/06/26	18:43:17	53.2
119	2019/06/26	18:47:17	67.0
120	2019/06/26	18:51:17	63.7
121	2019/06/26	18:55:17	63.5
122	2019/06/26	18:59:17	65.2
123	2019/06/26	19:03:17	69.7
124	2019/06/26	19:07:17	63.0
125	2019/06/26	19:11:17	72.1
126	2019/06/26	19:15:17	57.0
127	2019/06/26	19:19:17	60.0
128	2019/06/26	19:23:17	53.8
129	2019/06/26	19:27:17	65.8
130	2019/06/26	19:31:17	54.0
131	2019/06/26	19:35:17	59.4
132	2019/06/26	19:39:17	68.3
133	2019/06/26	19:43:17	64.2
134	2019/06/26	19:47:17	61.6
135	2019/06/26	19:51:17	68.4
136	2019/06/26	19:55:17	63.5
137	2019/06/26	19:59:17	71.6
138	2019/06/26	20:03:17	55.1
139	2019/06/26	20:07:17	69.7
140	2019/06/26	20:11:17	60.6
141	2019/06/26	20:15:17	71.9
142	2019/06/26	20:19:17	52.5
143	2019/06/26	20:23:17	62.3
144	2019/06/26	20:27:17	71.2
145	2019/06/26	20:31:17	64.1
146	2019/06/26	20:35:17	75.4
147	2019/06/26	20:39:17	72.4
148	2019/06/26	20:43:17	62.9
149	2019/06/26	20:47:17	64.2
150	2019/06/26	20:51:17	69.7
151	2019/06/26	20:55:17	70.4
152	2019/06/26	20:59:17	70.2
153	2019/06/26	21:03:17	60.1
154	2019/06/26	21:07:17	48.0
155	2019/06/26	21:11:17	69.4
156	2019/06/26	21:15:17	64.1
157	2019/06/26	21:19:17	46.3
158	2019/06/26	21:23:17	53.8
159	2019/06/26	21:27:17	56.6
160	2019/06/26	21:31:17	57.3
161	2019/06/26	21:35:17	59.7
162	2019/06/26	21:39:17	50.2
163	2019/06/26	21:43:17	50.2
164	2019/06/26	21:47:17	61.9
165	2019/06/26	21:51:17	52.8
166	2019/06/26	21:55:17	50.3
167	2019/06/26	21:59:17	65.4
168	2019/06/26	22:03:17	58.6
169	2019/06/26	22:07:17	51.9
170	2019/06/26	22:11:17	55.5
171	2019/06/26	22:15:17	62.0
172	2019/06/26	22:19:17	61.8
173	2019/06/26	22:23:17	50.7
174	2019/06/26	22:27:17	74.2
175	2019/06/26	22:31:17	56.1
176	2019/06/26	22:35:17	66.8
177	2019/06/26	22:39:17	65.5
178	2019/06/26	22:43:17	61.0
179	2019/06/26	22:47:17	50.9
180	2019/06/26	22:51:17	53.0
181	2019/06/26	22:55:17	45.4
182	2019/06/26	22:59:17	48.2
183	2019/06/26	23:03:17	63.8
184	2019/06/26	23:07:17	44.0

185	2019/06/26 23:11:17	45.2
186	2019/06/26 23:15:17	57.0
187	2019/06/26 23:19:17	68.4
188	2019/06/26 23:23:17	45.8
189	2019/06/26 23:27:17	51.2
190	2019/06/26 23:31:17	43.9
191	2019/06/26 23:35:17	50.3
192	2019/06/26 23:39:17	43.7
193	2019/06/26 23:43:17	44.2
194	2019/06/26 23:47:17	46.6
195	2019/06/26 23:51:17	44.8
196	2019/06/26 23:55:17	44.3
197	2019/06/26 23:59:17	54.1
198	2019/06/27 00:03:17	47.1
199	2019/06/27 00:07:17	62.1
200	2019/06/27 00:11:17	47.3
201	2019/06/27 00:15:17	41.4
202	2019/06/27 00:19:17	48.3
203	2019/06/27 00:23:17	51.2
204	2019/06/27 00:27:17	53.9
205	2019/06/27 00:31:17	42.8
206	2019/06/27 00:35:17	46.0
207	2019/06/27 00:39:17	44.8
208	2019/06/27 00:43:17	37.9
209	2019/06/27 00:47:17	40.4
210	2019/06/27 00:51:17	40.9
211	2019/06/27 00:55:17	41.2
212	2019/06/27 00:59:17	41.7
213	2019/06/27 01:03:17	38.1
214	2019/06/27 01:07:17	41.8
215	2019/06/27 01:11:17	38.1
216	2019/06/27 01:15:17	39.9
217	2019/06/27 01:19:17	40.8
218	2019/06/27 01:23:17	38.9
219	2019/06/27 01:27:17	38.2
220	2019/06/27 01:31:17	38.0
221	2019/06/27 01:35:17	39.2
222	2019/06/27 01:39:17	38.9
223	2019/06/27 01:43:17	40.4
224	2019/06/27 01:47:17	46.4
225	2019/06/27 01:51:17	38.2
226	2019/06/27 01:55:17	34.5
227	2019/06/27 01:59:17	35.4
228	2019/06/27 02:03:17	36.9
229	2019/06/27 02:07:17	47.3
230	2019/06/27 02:11:17	56.1
231	2019/06/27 02:15:17	40.3
232	2019/06/27 02:19:17	39.2
233	2019/06/27 02:23:17	35.8
234	2019/06/27 02:27:17	41.5
235	2019/06/27 02:31:17	37.5
236	2019/06/27 02:35:17	51.2
237	2019/06/27 02:39:17	40.1
238	2019/06/27 02:43:17	32.3
239	2019/06/27 02:47:17	31.2
240	2019/06/27 02:51:17	33.0
241	2019/06/27 02:55:17	48.6
242	2019/06/27 02:59:17	32.3
243	2019/06/27 03:03:17	35.5
244	2019/06/27 03:07:17	36.1
245	2019/06/27 03:11:17	37.5
246	2019/06/27 03:15:17	46.6
247	2019/06/27 03:19:17	49.5
248	2019/06/27 03:23:17	37.9
249	2019/06/27 03:27:17	39.6
250	2019/06/27 03:31:17	38.7
251	2019/06/27 03:35:17	35.6
252	2019/06/27 03:39:17	39.7
253	2019/06/27 03:43:17	59.7
254	2019/06/27 03:47:17	62.8
255	2019/06/27 03:51:17	50.4
256	2019/06/27 03:55:17	35.0
257	2019/06/27 03:59:17	44.6
258	2019/06/27 04:03:17	39.3
259	2019/06/27 04:07:17	45.0
260	2019/06/27 04:11:17	46.3
261	2019/06/27 04:15:17	53.0
262	2019/06/27 04:19:17	44.1
263	2019/06/27 04:23:17	44.4
264	2019/06/27 04:27:17	53.7
265	2019/06/27 04:31:17	44.9
266	2019/06/27 04:35:17	44.9
267	2019/06/27 04:39:17	46.7
268	2019/06/27 04:43:17	48.7
269	2019/06/27 04:47:17	66.3
270	2019/06/27 04:51:17	70.0
271	2019/06/27 04:55:17	47.5
272	2019/06/27 04:59:17	51.1
273	2019/06/27 05:03:17	54.1
274	2019/06/27 05:07:17	56.0
275	2019/06/27 05:11:17	56.5
276	2019/06/27 05:15:17	71.2
277	2019/06/27 05:19:17	54.3
278	2019/06/27 05:23:17	62.5
279	2019/06/27 05:27:17	70.8
280	2019/06/27 05:31:17	55.9
281	2019/06/27 05:35:17	71.8
282	2019/06/27 05:39:17	67.4
283	2019/06/27 05:43:17	68.6

284	2019/06/27	05:47:17	70.6
285	2019/06/27	05:51:17	55.8
286	2019/06/27	05:55:17	61.9
287	2019/06/27	05:59:17	66.2
288	2019/06/27	06:03:17	64.1
289	2019/06/27	06:07:17	71.6
290	2019/06/27	06:11:17	69.3
291	2019/06/27	06:15:17	68.4
292	2019/06/27	06:19:17	65.9
293	2019/06/27	06:23:17	70.1
294	2019/06/27	06:27:17	68.9
295	2019/06/27	06:31:17	70.5
296	2019/06/27	06:35:17	73.3
297	2019/06/27	06:39:17	75.4
298	2019/06/27	06:43:17	68.8
299	2019/06/27	06:47:17	71.1
300	2019/06/27	06:51:17	70.6
301	2019/06/27	06:55:17	64.4
302	2019/06/27	06:59:17	68.4
303	2019/06/27	07:03:17	66.9
304	2019/06/27	07:07:17	69.9
305	2019/06/27	07:11:17	69.9
306	2019/06/27	07:15:17	62.0
307	2019/06/27	07:19:17	61.5
308	2019/06/27	07:23:17	72.0
309	2019/06/27	07:27:17	71.4
310	2019/06/27	07:31:17	68.8
311	2019/06/27	07:35:17	69.8
312	2019/06/27	07:39:17	67.1
313	2019/06/27	07:43:17	67.3
314	2019/06/27	07:47:17	72.5
315	2019/06/27	07:51:17	69.6
316	2019/06/27	07:55:17	54.1
317	2019/06/27	07:59:17	72.1
318	2019/06/27	08:03:17	64.6
319	2019/06/27	08:07:17	69.5
320	2019/06/27	08:11:17	73.4
321	2019/06/27	08:15:17	62.5
322	2019/06/27	08:19:17	72.4
323	2019/06/27	08:23:17	71.7
324	2019/06/27	08:27:17	59.5
325	2019/06/27	08:31:17	69.0
326	2019/06/27	08:35:17	65.9
327	2019/06/27	08:39:17	73.0
328	2019/06/27	08:43:17	69.6
329	2019/06/27	08:47:17	68.4
330	2019/06/27	08:51:17	74.3
331	2019/06/27	08:55:17	63.7
332	2019/06/27	08:59:17	73.3
333	2019/06/27	09:03:17	59.0
334	2019/06/27	09:07:17	71.4
335	2019/06/27	09:11:17	70.0
336	2019/06/27	09:15:17	67.5
337	2019/06/27	09:19:17	52.6
338	2019/06/27	09:23:17	67.7
339	2019/06/27	09:27:17	68.4
340	2019/06/27	09:31:17	54.3
341	2019/06/27	09:35:17	75.0
342	2019/06/27	09:39:17	61.1
343	2019/06/27	09:43:17	57.5
344	2019/06/27	09:47:17	59.9
345	2019/06/27	09:51:17	56.4
346	2019/06/27	09:55:17	60.0
347	2019/06/27	09:59:17	71.5
348	2019/06/27	10:03:17	62.3
349	2019/06/27	10:07:17	68.8
350	2019/06/27	10:11:17	60.2
351	2019/06/27	10:15:17	69.4
352	2019/06/27	10:19:17	72.1
353	2019/06/27	10:23:17	61.9
354	2019/06/27	10:27:17	54.4
355	2019/06/27	10:31:17	72.3
356	2019/06/27	10:35:17	68.2
357	2019/06/27	10:39:17	61.6
358	2019/06/27	10:43:17	59.4
359	2019/06/27	10:47:17	62.2
360	2019/06/27	10:51:17	67.7

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 07/05/2019
Case Description: River View site preparation

**** Receptor #1 ****

Baselines (dBA)

Description	Land Use	Daytime	Evening	Night
Residences at 50 feet	Residential	70.0	50.0	45.0

Equipment

Description	Impact Device	Usage (%)	Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Dozer	No	40		81.7	50.0	0.0
Dozer	No	40		81.7	50.0	0.0
Dozer	No	40		81.7	50.0	0.0
Tractor	No	40	84.0		50.0	0.0
Tractor	No	40	84.0		50.0	0.0
Backhoe	No	40		77.6	50.0	0.0
Backhoe	No	40		77.6	50.0	0.0

Results

	Noise Limits (dBA)				Noise Limit Exceedance (dBA)			
	Calculated (dBA)		Day		Evening		Night	
Equipment	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
Dozer	81.7	77.7	N/A	N/A	N/A	N/A	N/A	N/A

	Day		Evening		Night	
Equipment	Lmax	Leq	Lmax	Leq	Lmax	Leq
Dozer	N/A	N/A	N/A	N/A	N/A	N/A

Dozer	81.7	77.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dozer	81.7	77.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tractor	84.0	80.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tractor	84.0	80.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Backhoe	77.6	73.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Backhoe	77.6	73.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	84.0	86.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**** Receptor #2 ****

Baselines (dBA)

Description	Land Use	Daytime	Evening	Night
Residences at 100 feet	Residential	70.0	50.0	45.0

Equipment

Description	Impact Device	Usage (%)	Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Dozer	No	40		81.7	100.0	0.0
Dozer	No	40		81.7	100.0	0.0
Dozer	No	40		81.7	100.0	0.0
Tractor	No	40	84.0		100.0	0.0
Tractor	No	40	84.0		100.0	0.0
Backhoe	No	40		77.6	100.0	0.0
Backhoe	No	40		77.6	100.0	0.0

Results

	Noise Limits (dBA)	Noise Limit Exceedance (dBA)

	Calculated (dBA)		Day		Evening		Night		Day		Evening		Night
Equipment	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
Dozer	75.6	71.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dozer	75.6	71.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dozer	75.6	71.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tractor	78.0	74.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tractor	78.0	74.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Backhoe	71.5	67.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Backhoe	71.5	67.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	78.0	80.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 07/05/2019
Case Description: River View grading

**** Receptor #1 ****

Baselines (dBA)

Description	Land Use	Daytime	Evening	Night
Residences at 50 feet	Residential	70.0	50.0	45.0

Equipment

Description	Impact Device	Spec Usage (%)	Actual Lmax (dBA)	Receptor Lmax (dBA)	Estimated Distance (feet)	Shielding (dBA)
Dozer	No	40	81.7	50.0	0.0	
Backhoe	No	40	77.6	50.0	0.0	
Backhoe	No	40	77.6	50.0	0.0	
Excavator	No	40	80.7	50.0	0.0	
Excavator	No	40	80.7	50.0	0.0	
Grader	No	40	85.0	50.0	0.0	
Scraper	No	40	83.6	50.0	0.0	
Scraper	No	40	83.6	50.0	0.0	

Results

	Noise Limits (dBA)				Noise Limit Exceedance (dBA)			
	Calculated (dBA)		Day		Evening		Night	
Equipment	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq

Dozer	81.7	77.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Backhoe	77.6	73.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Backhoe	77.6	73.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Excavator	80.7	76.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Excavator	80.7	76.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Grader	85.0	81.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Scraper	83.6	79.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Scraper	83.6	79.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	85.0	87.1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**** Receptor #2 ****

Baselines (dBA)

Description	Land Use	Daytime	Evening	Night
Residences at 100 feet	Residential	70.0	50.0	45.0

Equipment

Description	Impact Device	Spec Usage (%)	Actual Lmax (dBA)	Receptor Lmax (dBA)	Estimated Distance (feet)	Shielding (dBA)
Dozer	No	40	81.7	100.0	0.0	
Backhoe	No	40	77.6	100.0	0.0	
Backhoe	No	40	77.6	100.0	0.0	
Excavator	No	40	80.7	100.0	0.0	
Excavator	No	40	80.7	100.0	0.0	
Grader	No	40	85.0	100.0	0.0	
Scraper	No	40	83.6	100.0	0.0	
Scraper	No	40	83.6	100.0	0.0	

Results

			Noise Limits (dBA)				Noise Limit Exceedance (dBA)					
	Calculated (dBA)		Day		Evening		Night		Day		Evening		Night	
Equipment	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
Dozer	75.6	71.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Backhoe	71.5	67.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Backhoe	71.5	67.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Excavator	74.7	70.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Excavator	74.7	70.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Grader	79.0	75.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Scraper	77.6	73.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Scraper	77.6	73.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	79.0	81.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 07/05/2019

Case Description: River View building construction

**** Receptor #1 ****

Baselines (dBA)

Description	Land Use	Daytime	Evening	Night
Residences at 50 feet	Residential	70.0	50.0	45.0

Equipment

Description	Impact Device	Usage (%)	Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Crane	No	16		80.6	50.0	0.0
All Other Equipment > 5 HP	No	50		85.0	50.0	0.0
All Other Equipment > 5 HP	No	50		85.0	50.0	0.0
All Other Equipment > 5 HP	No	50		85.0	50.0	0.0
Generator	No	50		80.6	50.0	0.0
Backhoe	No	40		77.6	50.0	0.0
Backhoe	No	40		77.6	50.0	0.0
Tractor	No	40		84.0	50.0	0.0
Welder / Torch	No	40		74.0	50.0	0.0

Results

Equipment	Calculated (dBA) Lmax	Calculated (dBA) Leq	Noise Limits (dBA) Day Lmax	Noise Limits (dBA) Day Leq	Noise Limits (dBA) Evening Lmax	Noise Limits (dBA) Evening Leq	Noise Limits (dBA) Night Lmax	Noise Limits (dBA) Night Leq	Noise Limit Exceedance (dBA) Day Lmax	Noise Limit Exceedance (dBA) Day Leq	Noise Limit Exceedance (dBA) Evening Lmax	Noise Limit Exceedance (dBA) Evening Leq	Noise Limit Exceedance (dBA) Night Lmax	Noise Limit Exceedance (dBA) Night Leq
Crane														
All Other Equipment > 5 HP														
All Other Equipment > 5 HP														
All Other Equipment > 5 HP														
Generator														
Backhoe														
Backhoe														
Tractor														
Welder / Torch														

Crane	80.6	72.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
All Other Equipment > 5 HP	85.0	82.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
All Other Equipment > 5 HP	85.0	82.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
All Other Equipment > 5 HP	85.0	82.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Generator	80.6	77.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Backhoe	77.6	73.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Backhoe	77.6	73.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tractor	84.0	80.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Welder / Torch	74.0	70.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	85.0	88.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**** Receptor #2 ****

Baselines (dBA)

Description	Land Use	Daytime	Evening	Night
Residences at 100 feet	Residential	70.0	50.0	45.0

Equipment

Description	Impact Device	Spec Usage (%)	Actual Lmax (dBA)	Receptor Lmax (dBA)	Estimated Distance (feet)	Shielding (dBA)
Crane	No	16	80.6	100.0	0.0	
All Other Equipment > 5 HP	No	50	85.0	100.0	0.0	
All Other Equipment > 5 HP	No	50	85.0	100.0	0.0	
All Other Equipment > 5 HP	No	50	85.0	100.0	0.0	
Generator	No	50	80.6	100.0	0.0	

Backhoe	No	40	77.6	100.0	0.0
Backhoe	No	40	77.6	100.0	0.0
Tractor	No	40	84.0	100.0	0.0
Welder / Torch	No	40	74.0	100.0	0.0

Results

		Noise Limits (dBA)			Noise Limit Exceedance (dBA)												
	Calculated (dBA)		Day		Evening		Night		Day		Evening		Night				
Equipment	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq			
Crane	74.5	66.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
All Other Equipment > 5 HP	79.0	76.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
All Other Equipment > 5 HP	79.0	76.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
All Other Equipment > 5 HP	79.0	76.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
Generator	74.6	71.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
Backhoe	71.5	67.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
Backhoe	71.5	67.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
Tractor	78.0	74.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
Welder / Torch	68.0	64.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
Total	79.0	82.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 07/05/2019

Case Description: River View building construction

**** Receptor #1 ****

Baselines (dBA)

Description	Land Use	Daytime	Evening	Night
Residences at 50 feet	Residential	70.0	50.0	45.0

Equipment

Description	Impact Device	Usage (%)	Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Paver	No	50		77.2	50.0	0.0
Paver	No	50		77.2	50.0	0.0
Roller	No	20		80.0	50.0	0.0
Roller	No	20		80.0	50.0	0.0

Results

Equipment	Calculated (dBA) Lmax	Leq	Noise Limits (dBA) Day Lmax	Leq	Evening Lmax	Leq	Night Lmax	Leq	Noise Limit Exceedance (dBA) Day Lmax	Leq	Evening Lmax	Leq	Night Lmax	Leq
Paver	77.2	74.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Paver	77.2	74.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Roller	80.0	73.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Roller	80.0	73.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	80.0	79.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**** Receptor #2 ****

Baselines (dBA)

Description	Land Use	Daytime	Evening	Night
Residences at 100 feet	Residential	70.0	50.0	45.0

Equipment

Description	Impact Device	Spec Usage (%)	Actual Lmax (dBA)	Receptor Lmax (dBA)	Estimated Distance (feet)	Shielding (dBA)
Paver	No	50	77.2	100.0		0.0
Paver	No	50	77.2	100.0		0.0
Roller	No	20	80.0	100.0		0.0
Roller	No	20	80.0	100.0		0.0

Results

	Calculated (dBA)		Noise Limits (dBA) Day		Evening		Night		Noise Limit Exceedance (dBA) Day		Evening		Night	
Equipment	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
Paver	71.2	68.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Paver	71.2	68.2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Roller	74.0	67.0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

| | | |

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 07/05/2019

Case Description: River View architectural coating

**** Receptor #1 ****

Baselines (dBA)

Description	Land Use	Daytime	Evening	Night
Residences at 50 feet	Residential	70.0	50.0	45.0

Equipment

Description	Impact Device	Usage (%)	Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Compressor (air)	No	40		77.7	50.0	0.0

Results

	Calculated (dBA)		Noise Limits (dBA)				Noise Limit Exceedance (dBA)			
	Day		Evening		Night		Day		Evening	
Equipment	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
Compressor (air)	77.7	73.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	77.7	73.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

	Night		
Equipment	Lmax	Leq	
Compressor (air)	N/A	N/A	
Total	N/A	N/A	

**** Receptor #2 ****

Baselines (dBA)

Description	Land Use	Daytime	Evening	Night
Residences at 100 feet	Residential	70.0	50.0	45.0

Equipment

Description	Impact Device	Usage (%)	Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Compressor (air)	No	40		77.7	100.0	0.0

Results

	Calculated (dBA)		Noise Limits (dBA)				Noise Limit Exceedance (dBA)			
			Day		Evening		Night		Day		Evening		Night	
Equipment	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq
Compressor (air)	71.6	67.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	71.6	67.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

DNL Calculator

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Guidelines

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DNL Calculator

Site ID	River View - existing plus project run
Record Date	July 5, 2019
User's Name	Rincon Consultants

Road # 1 Name:	**River Road**

Road #1

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	175	175	175
Distance to Stop Sign			
Average Speed	55	55	50
Average Daily Trips (ADT)	11448	2147	716
Night Fraction of ADT	15	15	15
Road Gradient (%)			1
Vehicle DNL	60.6597	63.3907	64.7142
Calculate Road #1 DNL	67.9928	Reset	

Add Road Source | Add Rail Source

Airport Noise Level	
Loud Impulse Sounds?	○**Yes** ○**No**

Combined DNL for all Road and Rail sources	**67.9928**
Combined DNL including Airport	**N/A**
Site DNL with Loud Impulse Sound	

Calculate

Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- **No Action Alternative**: Cancel the project at this location
- **Other Reasonable Alternatives**: Choose an alternate site
- **Mitigation**
  - **Contact your Field or Regional Environmental Officer (/programs/environmental-review/hud-environmental-staff-contacts/)**
  - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
  - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
  - Incorporate natural or man-made barriers. See ***The Noise Guidebook (/resource/313/hud-noise-guidebook/)***
  - Construct noise barrier. See the **Barrier Performance Module (/programs/environmental-review/bpm-calculator/)**

Tools and Guidance

Day/Night Noise Level Assessment Tool User Guide (/resource/3822/day-night-noise-level-assessment-tool-user-guide/)

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DNL Calculator

Site ID	River View - existing plus project run
Record Date	July 5, 2019
User's Name	Rincon Consultants

Road # 1 Name:	**River Road**

Road #1

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	850	850	850
Distance to Stop Sign			
Average Speed	55	55	50
Average Daily Trips (ADT)	11448	2147	716
Night Fraction of ADT	15	15	15
Road Gradient (%)			1
Vehicle DNL	50.3639	53.095	54.4185
Calculate Road #1 DNL	57.6971	Reset	

Add Road Source | Add Rail Source

Airport Noise Level	
Loud Impulse Sounds?	○**Yes** ○**No**

Combined DNL for all Road and Rail sources	**57.6971**
Combined DNL including Airport	**N/A**
Site DNL with Loud Impulse Sound	

Calculate

Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- **No Action Alternative**: Cancel the project at this location
- **Other Reasonable Alternatives**: Choose an alternate site
- **Mitigation**
  - **Contact your Field or Regional Environmental Officer (/programs/environmental-review/hud-environmental-staff-contacts/)**
  - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
  - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
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DNL Calculator

Site ID	River View - existing run
Record Date	July 5, 2019
User's Name	Rincon Consultants

Road # 1 Name:	**River Road**

Road #1

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	175	175	175
Distance to Stop Sign			
Average Speed	55	55	50
Average Daily Trips (ADT)	11280	2115	705
Night Fraction of ADT	15	15	15
Road Gradient (%)			1
Vehicle DNL	60.5955	63.3255	64.647
Calculate Road #1 DNL	67.9268	Reset	

Add Road Source | Add Rail Source

Airport Noise Level	
Loud Impulse Sounds?	○**Yes** ○**No**

Combined DNL for all Road and Rail sources	**67.9268**
Combined DNL including Airport	**N/A**
Site DNL with Loud Impulse Sound	

Calculate

Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

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  - **Contact your Field or Regional Environmental Officer (/programs/environmental-review/hud-environmental-staff-contacts/)**
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- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- **Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- **Note #2:** DNL Calculator assumes roadway data is always entered.

DNL Calculator

Site ID	River View - existing run
Record Date	July 5, 2019
User's Name	Rincon Consultants

Road # 1 Name:	**River Road**

Road #1

Vehicle Type	**Cars** ☑	**Medium Trucks** ☑	**Heavy Trucks** ☑
Effective Distance	850	850	850
Distance to Stop Sign			
Average Speed	55	55	50
Average Daily Trips (ADT)	11280	2115	705
Night Fraction of ADT	15	15	15
Road Gradient (%)			1
Vehicle DNL	50.2997	53.0298	54.3513
Calculate Road #1 DNL	57.631	Reset	

Add Road Source | Add Rail Source

Airport Noise Level	
Loud Impulse Sounds?	○**Yes** ○**No**

Combined DNL for all Road and Rail sources	**57.631**
Combined DNL including Airport	**N/A**
Site DNL with Loud Impulse Sound	

Calculate

Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- **No Action Alternative**: Cancel the project at this location
- **Other Reasonable Alternatives**: Choose an alternate site
- **Mitigation**
  - **Contact your Field or Regional Environmental Officer (/programs/environmental-review/hud-environmental-staff-contacts/)**
  - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
  - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
  - Incorporate natural or man-made barriers. See ***The Noise Guidebook (/resource/313/hud-noise-guidebook/)***
  - Construct noise barrier. See the **Barrier Performance Module (/programs/environmental-review/bpm-calculator/)**

Tools and Guidance

Day/Night Noise Level Assessment Tool User Guide (/resource/3822/day-night-noise-level-assessment-tool-user-guide/)

Day/Night Noise Level Assessment Tool Flowcharts (/resource/3823/day-night-noise-level-assessment-tool-flowcharts/)

Exhibit G

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River View at Las Palmas Assisted Living Senior Facility Project

Augmentation to the Final Subsequent Environmental Impact Report

State Clearinghouse Number: 2017031025

prepared by

County of Monterey
Housing and Community Development Department
1441 Schilling Place, 2nd Floor
Salinas, California 93901
Contact: Zoe Zepp, Assistant Planner

prepared with the assistance of

Rincon Consultants, Inc.
80 Garden Court, Suite 240
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September 2023

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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Table of Contents

1 Introduction 1
1.1 Project Background 1
1.2 Augmentation to the Final Subsequent Environmental Impact Report 2
2 Additional Amendments to the Draft SEIR 4
4.0 Project Description 4
4.1 Project Objectives 4
17.0 Alternatives 5
17.1 CEQA Requirements 5
17.2 Alternatives Considered 5
17.3 Alternatives Considered But Rejected 21
17.4 Comparison of Alternatives 21
18.0 Sources 22

Tables

Table 17-1 Estimated Construction Emissions of Alternative 2 7
Table 17-2 Estimated Operational Emissions of Alternative 2 8
Table 17-3 Estimated Construction Emissions of Alternative 3a 11
Table 17-4 Estimated Operational Emissions of Alternative 3a 12
Table 17-5 Estimated Construction Emissions of Alternative 3b 15
Table 17-6 Estimated Operational Emissions of Alternative 3b 16
Table 17-7 Estimated Construction Emissions of Alternative 4 19
Table 17-8 Estimated Operational Emissions of Alternative 4 19
Table 17-9 Project Alternatives Summary 21

Appendices

Appendix A CalEEMod Modeling Output
Appendix B Traffic Impact Analysis

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1 Introduction

This Augmentation to the Final Subsequent Environmental Impact Report (Augmentation to the Final SEIR) has been prepared by the County of Monterey Housing and Community Development Department (County) for the proposed River View at Las Palmas Assisted Living Senior Facility Project ("proposed project" or "project").

1.1 Project Background

Proposed Project

The project, as originally proposed and analyzed under the California Environmental Quality Act (CEQA), would consist of an approximately 120,000 square-foot senior assisted living facility with multiple structures and site improvements on an approximately 15.64-acre project site in unincorporated Monterey County. The project site is located south of River Road, approximately 0.5 mile east of State Route (SR) 68 and immediately north of existing residential development along Woodridge Court and Country Park Road. The proposed project would provide assisted living facilities for seniors requiring varying levels of assistance, and would include a 27,000-square foot, two-story assisted living facility; a 21,600-square foot, three-story memory care facility; and 13 "Casitas", single-story residential structures providing 26 separate housing units. The proposed project would also include construction of internal roadways and parking, utility connections, landscaping, and other site improvements. The proposed project would have a total site coverage of approximately 190,000 square feet (27.6 percent of the project site).

Previous Project CEQA Review

The County issued a Notice of Preparation of a EIR in March 2017 for the proposed project, and an EIR was prepared for the project on behalf of the applicant. The County assumed control of the processing and content of this EIR, and the Draft Subsequent EIR (Draft SEIR) was released for public review in March 2018.[1] The County received 118 comment letters on the Draft SEIR; responses to comments were prepared pursuant to *CEQA Guidelines* Sections 15088 and 15132, and a Final SEIR was prepared in late 2019. The Monterey County Planning Commission recommended certification of the Final SEIR on February 12, 2020; however, the Final SEIR was not certified by the Board of Supervisors when it was considered at the August 31, 2021 or October 12, 2021 hearings. The September 2019 Final SEIR is herein incorporated by reference,[2] and would require certification by the Board of Supervisors alongside consideration of this Augmentation to the Final SEIR.

Alternative to the Proposed Project

Pursuant to *CEQA Guidelines* Section 15126.6, the applicant has prepared an alternative proposal to the project. As directed by the Monterey County Board of Supervisors on October 12, 2021, the project alternative includes development of a residential subdivision with up to 30 lots instead of the originally proposed senior assisted living facility (30-Lot Subdivision Alternative). This alternative

[1] The Draft Subsequent EIR is a supplement to the Final EIR for the River Road Area of Development Concentration Incorporating the Las Palmas Ranch Specific Plan Final EIR, certified in December 1982.

[2] https://www.co.monterey.ca.us/government/departments-a-h/housing-community-development/planning-services/library-current-major-projects/river-view-at-las-palmas-assisted-living-senior-facility

to the proposed project is similar to an alternative analyzed in the Draft SEIR, which considered a 40-lot residential subdivision alternative (Alternative 3 of the Draft SEIR).

1.2 Augmentation to the Final Subsequent Environmental Impact Report

Purpose of this Augmentation to the Final SEIR

To fully evaluate the potential environmental impacts of the new alternative to the proposed project, the County has prepared this Augmentation to the Final SEIR which incorporates the 30-Lot Subdivision Alternative into the alternatives analysis of the Draft SEIR. The 30-Lot Subdivision Alternative is included as Alternative 3b in the following revised alternatives analysis. In addition to incorporating this alternative into the analysis of the Draft SEIR, this Augmentation to the Final SEIR also includes minor clarifications and revisions to the analysis of the other alternatives to the proposed project. These clarifications and revisions incorporate quantitative modeling outputs that estimate air quality and greenhouse gas (GHG) emissions associated with each alternative to better compare the potential impacts associated with each alternative. These clarifications and revisions clarify and amplify analysis presented in the Draft SEIR and do not represent significant new information.

Contents of this Augmentation to the Final SEIR

This Augmentation to the Final SEIR includes the following contents:

- Section 1: Introduction
- Section 2: Additional Amendments to the Draft SEIR
- Appendices

Draft SEIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires recirculation when comments on a Draft EIR or responses thereto identify "significant new information." Significant new information is defined as including:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The quanitative modeling outputs and amendments presented in this document do not constitute "significant new information." The revisions primarily incorporate analysis of a new alternative, with a comparison of the alternative's impacts to those of the proposed project. As such, these revisions do not result in a new significant environmental impact from the project or from a new mitigation measure, as the project analysis and mitigation measures have not changed [Section 15088.5(1)]. Similarly, the additional air quality and greenhouse gas modeling conducted in support of this

Augmentation to the Final SEIR provide additional information that is supportive of the conclusions in the original alternatives analysis. As described in Section 2, *Additional Amendments to the Draft SEIR*, this additional quantitative modeling does not result in a new significant environmental impact or new mitigation measures [Section 15088.5(1)]. For the same reasons, the revisions do not constitute a substantial increase in the severity of an environmental impact [Section 15088.5(2)]. Although a new alternative has been introduced, it is substantially similar to an existing alternative (Alternative 3a). In addition, the project's proponent has not declined to adopt an alternative that would clearly lessen the environmental impacts of the proposed project. As such, Section15088.5(3) does not apply. Lastly, the Draft and Final SEIR were neither inadequate nor conclusory in nature, and meaningful public review and comment have not been precluded. As noted previously, the County received 118 comment letters on the Draft SEIR, including 103 from members of the public. These reviewers had the opportunity to review Section 17.0, *Alternatives,* of the Draft SEIR, which included a 40-lot subvisision (Alternative 3, No Project/Existing Zoning [40-Unit subdivision]; referred to as Alternative 3a in this Augmentation to the Final SEIR). The new Alternative 3b is substantially similar to Alternative 3a, as it would result in an up to 30-lot subdivision on the same site. Therefore, this new alternative is not substantially different such that the public is being deprieved of a meaningful opportunity to comment by its addition. The addition of Alternative 3a and associated revisions to the alternatives analysis instead clarifies, amplifies and makes insignificant modifications to the Draft SEIR.

2 Additional Amendments to the Draft SEIR

This chapter presents specific text changes made to the Draft SEIR since its publication and public review. These changes supplement and do not conflict with the Draft SEIR revisions provided in Section 4, *Revisions to the Draft SEIR*, included in the Final SEIR, which is incorporated by reference. Text deletions are shown in ~~strikethrough~~, and text additions are shown in underline. Please note that the entirety of Chapter 17.0, *Alternatives*, of the Draft SEIR is provided below for ease of review, while only portions of other sections of the Draft SEIR are provided, where revisions are made. The information contained within this chapter clarifies and expands on information in the Draft SEIR and does not constitute "significant new information" requiring recirculation, as described above.

4.0 Project Description

4.1 Project Objectives

The objectives of the proposed project, provided by the applicant, are:

- ~~To develop a state of the art facility to provide a Continuum of Care Residential Community designed to provide care to seniors over the age of 55 and to persons with diminishing mental capacity due to Alzheimer's, dementia, or similar causes.~~
- To provide a range of housing and/or care options for seniors over the age of 55; persons with diminishing mental capacity; and persons who do not require 24-hour skilled nursing care but are in need of a range of personal assistance with the activities of daily living such as dressing, bathing, grooming, and medication management.
- ~~To provide a range of accommodations which will allow persons who only need some help to maintain a modicum of an independent lifestyle to move into smaller home-like suites and then transition to other on site facilities which can provide a greater level of daily personal assistance as needed.~~
- To provide housing ~~such a facility~~ in a geographic location where ~~the need for such a facility~~ it is clearly needed and where adequate public facilities currently exist or can be readily provided.
- To provide housing ~~such a facility~~ in and near an established community so that residents in the facility can feel a sense of connection with local residents ~~and where in turn local residents as they age or their circumstances change can relocate to an assisted living facility without the need to move from their community or far away from their families~~.
- To address the critical need for housing for residents of the community in need of suitable housing options.
- ~~To provide a range of job and volunteer opportunities for persons in the area and in the Las Palmas community.~~
- ~~Be licensed by the State of California as a Residential Care Facility for the Elderly (RCFE).~~

17.0 Alternatives

17.1 CEQA Requirements

CEQA Guidelines section 15126.6(a) requires a description of reasonable alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. It also requires an evaluation of the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. CEQA Guidelines section 15126.6(b) further requires that the discussion of alternatives focus on those alternatives capable of eliminating any significant adverse environmental impacts or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. CEQA Guidelines section 15126.6(e) stipulates that a no project alternative be evaluated along with its impacts.

CEQA Guidelines section 15126.6(d) requires the EIR to present enough information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. CEQA Guidelines section 15126.6(e) requires the identification of an environmentally superior alternative. If the "No Project" alternative is the environmentally superior alternative, then the environmentally superior alternative amongst the remaining alternatives must be identified.

17.2 Alternatives Considered

The following alternatives to the project are considered:

- Alternative 1: No project/no development;
- Alternative 2: No project/minimum use;
- Alternative 3a: No project/existing zoning (40-Lot Subdivision);
- Alternative 3b: Reduced no project/existing zoning (up to a 30-Lot Subdivision); and
- Alternative 4: Reduced project.

Each of these alternatives are ~~is~~ described below, followed by a summary of impacts associated with the proposed project and an analysis of how each alternative may reduce impacts associated with the proposed project. Where possible, impacts associated with each alternative are discussed quantitatively. To more clearly compare impacts associated with air quality and greenhouse gas (GHG) emissions of each alternative, construction and operational emissions associated with each alternative were estimated using the California Emissions Estimator Model (CalEEMod), version 2022.1.1.16. CalEEMod was developed for use throughout the state in estimating construction, operational, and mobile-source emissions. Potential buildout of each project alternative was estimated and assumptions were incorporated into the CalEEMod modeling. CalEEMod modeling outputs are included as Appendix A.

Alternative 1: No Project/No Development

CEQA Guidelines section 15126.6 (e) requires the "no project" alternative be evaluated along with its impacts. The "no project" alternative analysis must discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Alternative Description

The "no project/no development" alternative assumes no development would occur on the project site. The project site would continue to be vacant land, partially used for grazing. Under this alternative, there would be no potential adverse impacts to aesthetics, air quality biological resources, GHG emissions, transportation and traffic, or water supply.

Alternative 2: No Project/Minimum Use

Alternative Description

The "no project/minimum use" alternative assumes the proposed project would not be constructed or operated on the project site. Instead, this alternative considers the construction of the minimum allowable use on the subject property, which would be one single family dwelling and any accessory structures considered incidental to residential use, such as barns and storage buildings.

Aesthetics

The proposed project would impact scenic vistas and the visual character of the site, and would introduce new sources of light and glare to the project site and vicinity. Impacts to scenic vistas, the visual character of the site, and the introduction of new sources of light and glare would be potentially significant impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AES-1, AES-2, AES-3, and AES-4.

Alternative 2 would have less aesthetic-related impacts than the proposed project. Although possible to have aesthetic impacts based on the size and location on the project site of any structures related to a single-family residence, any potential impacts would be less than the proposed project. However, this form of development may still be within the public viewshed from scenic vista points, would change the visual character of the site from undeveloped to developed, and would also introduce new sources of light and glare to the project site and vicinity. Similar mitigation measures to reduce impacts to a less-than-significant level as for the proposed project would likely be applicable to Alternative 2, depending on proposed site design. However, as there would be no discretionary approval for the project, having enforceable mitigation measures applied to the site would be unlikely.

Air Quality

The proposed project would have air quality-related impacts related to emissions during construction of the proposed project on the site. These impacts would be potentially significant impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AQ-1, AQ-2, AQ-3, and AQ-4.

Alternative 2 would have less air quality-related impacts than the proposed project. Construction activities on the project site for one single family residence and associated structures would have

construction related emissions.; hHowever, construction emissions would be substantially lower than the emissions of the proposed project, which would involve greater and more intense emissions associated with the construction of the assisted living facility, memory care facility, and 13 Casitas residential units. The estimated construction emissions associated with Alternative 2 are shown below in Table 17-1 and are compared to maximum emissions thresholds established by the Monterey Bay Air Resources District (MBARD). For informational purposes, construction emissions of the proposed project were estimated using CalEEMod version 2022.1.1.16, consistent with the modeling of Alternative 2 emissions. These estimates are not intended to supersede the air quality modeling provided in Chapter 6.0, *Air Quality*, of the Draft SEIR, which used CalEEMod version 2016.3.1. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis.

Table 17-1 Estimated Construction Emissions of Alternative 2

	Maximum Daily Emissions (lbs/day)						Annual Emissions (MT/year)
	ROG	NO_x	PM_{10}	CO	SO_2	$PM_{2.5}$	CO_2e
Proposed Project Maximum Construction Emissions[1]	196	58	26	41	<1	13	617
Alternative 2: Construction Year 2024	4	52	25	39	<1	12	470
Alternative 2: Construction Year 2025	3	10	<1	13	<0.1	<1	100
MBARD Thresholds	**137**	**137**	**82**	**N/A**	**152**	**N/A**	**N/A**

lbs/day = pounds per day; MT/year = metric tons per year; ROG = reactive organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; CO2e = carbon dioxide equivalents; N/A = not applicable; MBARD = Monterey Bay Air Resources District

Notes: Emissions estimates are rounded to the nearest whole number. Emissions modeling was completed using CalEEMod. See Appendix A for modeling results.

[1] Proposed project air quality emissions were modeled here using CalEEMod version 2022.1.1.16 for informational purposes. The air quality emissions in Chapter 6.0, *Air Quality*, of the Draft SEIR used an older version of the model, which is no longer recommended for use.

Source: MBARD 2008

As shown above in Table 17-1, emissions associated with Alternative 2 would not exceed thresholds established by MBARD, and would be reduced compared to the proposed project. Based ~~based~~ on the reduced scale of construction, construction emissions would not represent significant impacts and no mitigation measures would likely be required to reduce impacts to a less-than-significant level.

In operation, Alternative 2 would result in reduced emissions compared to the proposed project. Table 17-2 shows estimated operational emissions associated with Alternative 2. For informational purposes, operational emissions of the proposed project were estimated using CalEEMod version 2022.1.1.16, consistent with the modeling of Alternative 2 emissions. These estimates are not intended to supersede the air quality modeling provided in Chapter 6.0, *Air Quality*, of the Draft SEIR. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis.

Table 17-2 Estimated Operational Emissions of Alternative 2

	ROG	NO_x	PM_{10}	CO	SO_2	$PM_{2.5}$	CO_2e (MT/year)
Proposed Project Annual Emissions[1] (tpy)	1	<1	<1	4	<0.1	<1	1,005
Alternative 2 Annual Emissions (tpy)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	19

tpy = tons per year; MT/year = metric tons per year; ROG = reactive organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; CO2e = carbon dioxide equivalents

Notes: Emissions estimates are rounded to the nearest whole number. Emissions modeling was completed using CalEEMod. See Appendix A for modeling results.

[1] Proposed project air quality emissions were modeled here using CalEEMod version 2022.1.1.16 for informational purposes. The air quality emissions in Chapter 6.0, *Air Quality*, of the Draft SEIR used an older version of the model, which is no longer recommended for use.

As shown above, Alternative 2 would not generate considerable amounts of air pollutants in operation. Operational air quality emissions would be reduced compared to the proposed project, as the operation of the larger assisted living facilities would generate more emissions than a single-family residence.

The air quality impacts of Alternative 2 would be less than significant and would not require implementation of Mitigation Measures AQ-1, AQ-2, AQ-3, and AQ-4. Impacts would be reduced compared to the proposed project, as the proposed project would require mitigation.

Biological Resources

The proposed project would impact biological resources, including potential loss or disturbance of American badgers, potential loss or disturbance of burrowing owls, potential loss or disturbance of Monterey dusky-footed woodrats, potential loss or disturbance of special-status bats, and potential loss or disturbance of nesting birds. All potential impacts can be reduced to less-than-significant levels with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-6. The proposed project would also have a less-than-significant impact on impeding the movement of common wildlife.

Alternative 2 would have much fewer potential biological impacts than the proposed project. Construction activities on the project site for one single family residence and associated structures would result in minimal impacts ~~significant impacts~~ to biological resources due to the smaller building footprint.

Greenhouse Gas Emissions

The proposed project's greenhouse gas emissions would be less than significant and no mitigation measures are required. For informational purposes, GHG emissions of the proposed project were estimated using CalEEMod version 2022.1.1.16, consistent with the modeling of Alternative 2 emissions. These estimates are not intended to supersede the GHG modeling provided in Chapter 8.0, *Greenhouse Gas Emissions*, of the Draft SEIR, which used CalEEMod version 2016.3.1. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis. The proposed project would result in a total of 617 metric tons per year (MT/year) of carbon dioxide equivalent (CO_2e) during construction and 1,005 MT/year of CO_2e during operation (please refer to Table 17-1 and Table 17-2).

As shown in Table 17-1 under *Air Quality,* this alternative would generate approximately 570 MT/year of CO_2e during construction. Additionally, as shown in Table 17-2, Alternative 2 would generate approximately 19 MT/year of CO_2e during operation (Appendix A). Neither the County of Monterey, MBARD, nor any other state or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. Additionally, emissions associated with Alternative 2 would be relatively negligible, as the construction of a single-family residence would not generate a substantial amount of GHG emissions. Alternative 2 would result in fewer greenhouse gas emissions than the proposed project, and impacts~~, which~~ would be less than significant and no mitigation measures would be required.

Transportation and Traffic

As a combined assisted living facility (100 beds) and detached assisted living units ~~units~~ (26 units; 42 beds), based on ITE trip generation rates for each category, the proposed project would ~~generation~~ generate approximately 363 daily trips (266 for assisted living facility and 96 for the detached assisted living units. The proposed project would result in less-than-significant impacts to area intersections and roadways segments of River Road. However, the proposed project would result in a significant and unavoidable impact of adding additional traffic to SR 68.

Based on trip generation rates for single family homes in the Las Palmas development, one single family residence on the project site would generate approximately 7.1 daily trips.

Therefore, Alternative 2 would result in a decreased amount of daily trips to and from the project site and can be expected to have less impacts than the proposed project. However, as even one single family residence could result in additional traffic on SR 68 during the AM and/or PM peak hours, Alternative 2 would also result in a significant and unavoidable impact.

Water Supply

The proposed project would have an estimated water demand of 11.376 AFY. ~~Applying the water demand assigned to the casita units of the proposed project (2.876 AFY for 26 units) for the conceptual build-out of one single family residential unit on the project site would be significantly less.~~ The single-family residence that would be constructed under Alternative 2 would be expected to have a water demand of approximately 0.12 AFY (Monterey Peninsula Water Management District 2022),[3] which is substantially less than the water demand of the proposed project. Therefore, while the proposed project would result in a less-than-significant impact to water supply, Alternative 2 would result in a lower water demand.

Alternative 3a: No Project/Existing Zoning (40-Lot Subdivision)

Alternative Description

The "no project/existing zoning (40-lot subdivision)" alternative assumes the proposed project would not be constructed or operated on the project site. However, considering that the project site is designated for medium density residential development, it is reasonable to assume that up to 40 dwelling units could be approved and constructed on the project site. Although, it is worth noting that other use categories could also be considered for this alternative. Based on existing zoning for the project site, the following uses could be established on the project site:

[3] Rates based on the October 2018 to September 2019 actual residential water usage in Monterey County (510,364,680 gallons per 9,399 residential units), converted to acre-feet.

- Public and quasi-public uses including churches, cemeteries, parks, playgrounds, schools, public safety facility, public utility facilities;
- Mobile home park;
- ~~Agricultural e~~Employee housing;
- Christmas tree cutting and removal and other uses of similar agricultural nature;
- Other uses of a similar nature, density and intensity;
- Transitional Housing; or
- Supportive Housing.

Supportive housing is defined by the Monterey County Code as housing with no limit on length of stay that is occupied by a target population" ("Target population" means persons with low income having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act (California Welfare and Institutions Code, section 4500 et seq.) and may include, among other populations, adults, emancipated youth, families, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (MCC 21.06.1278) and is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community. Transitional housing and transitional housing development is considered as buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time of no less than six months. The county's zoning code describes each use as being contained within allowed housing units of the zoning district (Monterey County 2017).

Therefore, for purposes of this analysis, Alternative 3a considers that the 40 single-family residential units on the site could also be considered as 40 supportive housing units, or 40 transitional housing units. Each unit could have multiple bedrooms and house a number of persons. For purposes of this alternatives analysis, 40 units of single-family, supportive housing, or transitional units are considered to be roughly equivalent.

Aesthetics

The proposed project would impact scenic vistas and the visual character of the site, and would introduce new sources of light and glare to the project site and vicinity. Impacts to scenic vistas and the introduction of new sources of light and glare would be potentially significant impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AES-1, AES-2, AES-3, and AES-4.

Alternative 3a would have similar aesthetic-related impacts as the proposed project, as development on the site of up to 40 residential units would be expected to occur. This form of development would still be within the public viewshed from scenic vista points, would change the visual character of the site from undeveloped to developed, and would also introduce new sources of light and glare to the project site and vicinity. Mitigation measures applicable to the proposed project would also apply to Alternative 3a.

Air Quality

The proposed project would have air quality-related impacts related to emissions during construction of the proposed project on the site. These impacts would be potentially significant impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AQ-1, AQ-2, AQ-3, and AQ-4.

Alternative 3a would have similar air quality-related impacts as the proposed project, as development on the site of up to 40 residential units would be expected to occur. The estimated construction emissions associated with Alternative 3a are shown below in Table 17-3 and are compared to maximum emissions thresholds established by MBARD. For informational purposes, construction emissions of the proposed project were estimated using CalEEMod version 2022.1.1.16, consistent with the modeling of Alternative 3a emissions. These estimates are not intended to supersede the air quality modeling provided in Chapter 6.0, *Air Quality*, of the Draft SEIR. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis.

Table 17-3 Estimated Construction Emissions of Alternative 3a

	Maximum Daily Emissions (lbs/day)						Annual Emissions (MT/year)
	ROG	NO_x	PM_{10}	CO	SO_2	$PM_{2.5}$	CO_2e
Proposed Project Maximum Construction Emissions[1]	196	58	26	41	<1	13	617
Alternative 3a: Construction Year 2024	4	52	25	39	<1	13	490
Alternative 3a: Construction Year 2025	104	11	<1	14	<0.1	<1	107
MBARD Thresholds	**137**	**137**	**82**	**N/A**	**152**	**N/A**	**N/A**

lbs/day = pounds per day; MT/year = metric tons per year; ROG = reactive organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; CO2e = carbon dioxide equivalents; N/A = not applicable; MBARD = Monterey Bay Air Resources District

Notes: Emissions estimates are rounded to the nearest whole number. Emissions modeling was completed using CalEEMod. See Appendix A for modeling results.

[1] Proposed project air quality emissions were modeled here using CalEEMod version 2022.1.1.16 for informational purposes. The air quality emissions in Chapter 6.0, *Air Quality*, of the Draft SEIR used an older version of the model, which is no longer recommended for use.

Source: MBARD 2008

As shown in Table 17-3, construction emissions associated with Alternative 3a would not exceed MBARD thresholds, and would be reduced compared to the proposed project. However, grading and construction of the 40 housing units would occur directly adjacent to the existing residences west of the project site, and generation of air emissions in proximity to these receivers could be significant. ~~Construction activities on the project site for up to this number of residences would have construction related emissions which would be potentially significant.~~ Mitigation measures applicable to the proposed project would also apply to Alternative 3a. Impacts would be reduced compared to the proposed project and would be less than significant with mitigation.

In operation, Alternative 3a would result in reduced emissions compared to the proposed project. Table 17-4 shows estimated operational emissions associated with Alternative 3a. For informational purposes, operational emissions of the proposed project were estimated using CalEEMod version

2022.1.1.16, consistent with the modeling of Alternative 3a emissions. These estimates are not intended to supersede the air quality modeling provided in Chapter 6.0, *Air Quality*, of the Draft SEIR. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis.

Table 17-4 Estimated Operational Emissions of Alternative 3a

	ROG	NO_x	PM_{10}	CO	SO_2	$PM_{2.5}$	CO_2e (MT/year)
Proposed Project Annual Emissions[1] (tpy)	1	<1	<1	4	<0.1	<1	1,005
Alternative 3a Annual Emissions (tpy)	<1	<1	<1	3	<0.1	<1	759

tpy = tons per year; MT/year = metric tons per year; ROG = reactive organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; CO2e = carbon dioxide equivalents
Notes: Emissions estimates are rounded to the nearest whole number. Emissions modeling was completed using CalEEMod. See Appendix A for modeling results.
[1] Proposed project air quality emissions were modeled here using CalEEMod version 2022.1.1.16 for informational purposes. The air quality emissions in Chapter 6.0, *Air Quality*, of the Draft SEIR used an older version of the model, which is no longer recommended for use.

As shown above, Alternative 3a would not generate considerable amounts of air pollutants in operation, and would result in reduced air quality emissions as compared to the proposed project.

Air quality impacts of Alternative 3a would be reduced compared to the proposed project and would be less than significant with Mitigation Measures AQ-1, AQ-2, AQ-3, and AQ-4, similar to the proposed project.

Biological Resources

The proposed project would impact biological resources, including potential loss or disturbance of American badgers, potential loss or disturbance of burrowing owls, potential loss or disturbance of Monterey dusky-footed woodrats, potential loss or disturbance of special-status bats, and potential loss or disturbance of nesting birds. All potential impacts can be reduced to less-than-significant levels with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-6. The proposed project would also have a less-than-significant impact on impeding the movement of common wildlife.

Alternative 3a would have similar biological impacts as the proposed project, as development on the site of up to 40 residential units would be expected to occur. Mitigation measures applicable to the proposed project would also apply to Alternative 3a.

Greenhouse Gas Emissions

The proposed project's greenhouse gas emissions would be less than significant and no mitigation measures are required. For informational purposes, GHG emissions of the proposed project were estimated using CalEEMod version 2022.1.1.16, consistent with the modeling of Alternative 3a emissions. These estimates are not intended to supersede the GHG modeling provided in Chapter 8.0, *Greenhouse Gas Emissions*, of the Draft SEIR. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis. The proposed project would result in a total of 617 MT/year of CO_2e during construction and 1,005 MT/year of CO_2e during operation (please refer to Table 17-3 and Table 17-4).

As shown in Table 17-3 under *Air Quality* for Alternative 3a, this alternative would generate approximately 597 MT/year of CO_2e during construction. Additionally, Alternative 3a would generate approximately 759 MT/year of CO_2e during operation (Appendix A). Neither the County of Monterey, MBARD, nor any other state or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. GHG emissions associated with Alternative 3a would be reduced as compared to the proposed project, and impacts would remain less than significant, similar to the proposed project. ~~Alternative 3a would also result in greenhouse gas emissions which would be less than significant and no~~ No mitigation measures would be required.

Transportation and Traffic

As a combined assisted living facility (100 beds) and detached assisted living units (26 units; 42 beds), based on ITE trip generation rates for each category, the proposed project would ~~generation~~ generate approximately 362 daily trips (266 for assisted living facility and 96 for senior adult housing units. The proposed project would result in less-than-significant impacts to area intersections and roadways segments of River Road. However, the proposed project would result in a significant and unavoidable impact of adding additional traffic to SR 68.

Based on trip generation rates for single family homes in the Las Palmas development, 40 single family residences on the project site would generate approximately 284 daily trips.

Therefore, Alternative 3a would result in fewer ~~an increased amount of~~ daily trips to and from the project site and can be expected to have lesser ~~greater~~ impacts than the proposed project. However, ~~Furthermore,~~ Alternative 3a would still ~~also~~ result in a significant and unavoidable impact to SR 68. Mitigation measures applicable to the proposed project would also apply to Alternative 3a.

Water Supply

The proposed project would have an estimated water demand of 11.376 AFY. The 40 housing units that would be constructed under Alternative 3a would be expected to have a water demand of approximately 6.7 AFY (Monterey Peninsula Water Management District 2022),[4] which is less than the water demand of the proposed project. Therefore, Alternative 3a would result in a less-than-significant impact to water supply, and impacts would be lesser than the proposed project. ~~Applying the water demand assigned to the casita units of the proposed project (2.876 AFY for 26 units) for the conceptual build-out of up to 40 single family residential units on the project site would likely be less than 5.00 AFY. Therefore, while the proposed project would result in a less-than-significant impact to water supply, Alternative 3a would result in a lower water demand.~~

Alternative 3b: Reduced No Project/Existing Zoning (Up to a 30-Lot Subdivision)

Alternative Description

The "30-Lot Subdivision" alternative would include subdivision of the project site into no more than 30 lots, which would be developed with single-family residences. Under this alternative, the project site would be subdivided into 30 residential lots and an open space parcel and developed with 30 single-family residences, four of which would be affordable housing units. If the four affordable

[4] Rates based on the October 2018 to September 2019 actual residential water usage in Monterey County (510,364,680 gallons per 9,399 residential units), converted to acre-feet.

units are not developed on site, the project site would be subdivided into 26 lots and an open space parcel and developed with 26 single-family residences, and the project applicant would pay an in-lieu affordable housing fee to the County. To provide a conservative analysis, a 30-lot subdivision is evaluated in this analysis.

Lot sizes would vary in area and would be between 4,249 square feet and 11,785 square feet; the median lot size would be 5,796 square feet. Lots are clustered pursuant to Section 21.12.060.A of the County Municipal code. The subdivided parcels would encompass approximately 160,000 square feet of the project site. However, due to site coverage and setback limits, less than 160,000 square feet of the project site would be developed with residences under this alternative (the remainder would be left as open space). The total area of Alternative 3b would be 30,000 square feet less than that of the proposed project and would encompass approximately 23.2 percent of the project site, or 4.4 percent less than the proposed project.

Similar to the proposed project, the site would be accessible via Woodridge Court and a new residential roadway would be constructed within the project site to provide access to each lot. Proposed residences would be a maximum of 20 feet in height measured from average natural grade, which is less than the maximum allowable building height of 30 feet from average natural grade. Alternative 3b would require removal of approximately 70 eucalyptus trees, which would be reduced compared to the 80 trees that would be removed under the proposed project. Some of the trees that would remain under Alternative 3b are within the Critical Viewshed as defined in the Toro Area Plan. Although they are not a protected tree species within Monterey County, the trees aid in shielding the potential development from the viewshed of SR 68, River Road, and Las Palmas #1. Alternative 3b would also include 13 off-street guest parking spaces (not associated with a specific residence) along the proposed residential roadway. Water, sewer, electricity, and natural gas providers would be the same as under the proposed project.

Aesthetics

The proposed project would impact scenic vistas and the visual character of the site, and would introduce new sources of light and glare to the project site and vicinity. Impacts to scenic vistas and the introduction of new sources of light and glare would be potentially significant impacts of the proposed project, but would be reduced to less-than-significant levels with the application of Mitigation Measures AES-1, AES-2, AES-3, and AES-4.

Development facilitated by Alternative 3b would be reduced compared to the proposed project. The total area of the residential subdivision under this alternative would encompass approximately 160,000 square feet, 30,000 square feet less than the proposed project. Additionally, the scale and massing of up to 30 single-family residences (up to 20 feet in height) would be substantially reduced compared to the assisted care living facility, memory care living facility (up to 30 feet in height, located within a Critical Viewshed of the Toro Area Plan), and 13 Casitas residential buildings included in the proposed project. Alternative 3b would introduce less light and glare to the project site compared to the proposed project, and the removal of 10 fewer on-site trees (70 trees under Alternative 3b as compared to 80 trees under the proposed project) would result in more similar views of the site from the viewshed of SR 68, River Road, and Las Palmas #1 as under existing conditions. Additionally, on-site development under Alternative 3b would be similar to surrounding residential development. The single-family residences would be more visually consistent with the existing residences in the project vicinity, and would not conflict with the Las Palmas Ranch Specific Plan Design Guidelines.

Impacts under Alternative 3b would be reduced compared to the proposed project as development would be substantially reduced in scale. Mitigation Measures AES-1, AES-2, AES-3, and AES-4 would also apply to Alternative 3b to reduce impacts associated with views from SR 68, exterior lighting, and visual consistency with the existing landscape. Aesthetic impacts of Alternative 3b would be reduced compared to the proposed project and would be less than significant with mitigation.

Air Quality

The proposed project would have air quality-related impacts related to emissions during construction of the proposed project on the site. These impacts would be potentially significant, but would be reduced to less-than-significant levels with the application of Mitigation Measures AQ-1, AQ-2, AQ-3, and AQ-4.

Alternative 3b would involve construction and grading activities similar to the proposed project. However, due to the reduced scale and size of Alternative 3b, less construction and grading would be required, which would reduce the severity of potentially significant impacts. Additionally, the proposed lots would be located in an area of the project site with gentler grades, compared to some proposed project components that would be located on steeper grades, and less grading would be required as a result. The estimated construction emissions associated with Alternative 3b are shown below in Table 17-5 and are compared to maximum emissions thresholds established by MBARD. For informational purposes, construction emissions of the proposed project were estimated using CalEEMod version 2022.1.1.16, consistent with the modeling of Alternative 3b emissions. These estimates are not intended to supersede the air quality modeling provided in Chapter 6.0, *Air Quality*, of the Draft SEIR. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis.

Table 17-5 Estimated Construction Emissions of Alternative 3b

	Maximum Daily Emissions (lbs/day)						Annual Emissions (MT/year)
	ROG	NO_x	PM_{10}	CO	SO_2	$PM_{2.5}$	CO_2e
Proposed Project Maximum Construction Emissions[1]	196	58	26	41	<1	13	617
Alternative 3b: Construction Year 2024	4	52	25	39	<1	13	466
Alternative 3b: Construction Year 2025	78	11	<1	14	<0.1	<1	94
MBARD Thresholds	**137**	**137**	**82**	**N/A**	**152**	**N/A**	**N/A**

lbs/day = pounds per day; MT/year = metric tons per year; ROG = reactive organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; CO2e = carbon dioxide equivalents; N/A = not applicable; MBARD = Monterey Bay Air Resources District

Notes: Emissions estimates are rounded to the nearest whole number. Emissions modeling was completed using CalEEMod. See Appendix A for modeling results.

[1] Proposed project air quality emissions were modeled here using CalEEMod version 2022.1.1.16 for informational purposes. The air quality emissions in Chapter 6.0, *Air Quality*, of the Draft SEIR used an older version of the model, which is no longer recommended for use.

Source: MBARD 2008

As shown in Table 17-5, construction emissions associated with Alternative 3b would not exceed MBARD thresholds, and would be reduced compared to the proposed project. Similar to the

proposed project, Alternative 3b would generate dust and construction emissions and Mitigation Measures AQ-1 through AQ-4 would be required; however, construction emissions would be reduced compared to the proposed project and would be less than significant with mitigation. Additionally, due to the proposed location of residences under Alternative 3b, grading and other construction activities would be located farther from nearby off-site residences than under the proposed project.

In operation, Alternative 3b would result in reduced emissions compared to the proposed project. Table 17-6 shows estimated operational emissions associated with Alternative 3b. For informational purposes, operational emissions of the proposed project were estimated using CalEEMod version 2022.1.1.16, consistent with the modeling of Alternative 3b emissions. These estimates are not intended to supersede the air quality modeling provided in Chapter 6.0, *Air Quality*, of the Draft SEIR. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis.

Table 17-6 Estimated Operational Emissions of Alternative 3b

	ROG	NO_x	PM_{10}	CO	SO_2	$PM_{2.5}$	CO_2e (MT/year)
Proposed Project Annual Emissions[1] (tpy)	1	<1	<1	4	<0.1	<1	1,005
Alternative 3b Annual Emissions (tpy)	<1	<1	<0.1	3	<0.1	<1	569

tpy = tons per year; MT/year = metric tons per year; ROG = reactive organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; CO2e = carbon dioxide equivalents

Notes: Emissions estimates are rounded to the nearest whole number. Emissions modeling was completed using CalEEMod. See Appendix A for modeling results.

[1] Proposed project air quality emissions were modeled here using CalEEMod version 2022.1.1.16 for informational purposes. The air quality emissions in Chapter 6.0, *Air Quality*, of the Draft SEIR used an older version of the model, which is no longer recommended for use.

As shown above, Alternative 3b would not generate considerable amounts of air pollutants in operation. Operational air emissions would be reduced compared to the proposed project, as the operation of the larger assisted living facilities would generate more emissions than up to 30 residences.

Air quality impacts of Alternative 3b would be reduced compared to the proposed project and would be less than significant with Mitigation Measures AQ-1, AQ-2, AQ-3, and AQ-4, similar to the proposed project.

Biological Resources

The proposed project would impact biological resources, including potential loss or disturbance of American badgers, potential loss or disturbance of burrowing owls, potential loss or disturbance of Monterey dusky-footed woodrats, potential loss or disturbance of special-status bats, and potential loss or disturbance of nesting birds. All potential impacts can be reduced to less-than-significant levels with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-6. The proposed project would also have a less-than-significant impact on impeding the movement of common wildlife.

Alternative 3b would disturb less of the project site than the proposed project, and would involve development of approximately 30,000 fewer square feet than the proposed project. As described in

the Alternative Description for Alternative 3b, this alternative would develop approximately 4.4 percent less of the project site compared to the proposed project. Ten (10) fewer trees would be removed, which would reduce potential impacts to nesting birds and bats, and less undeveloped land would be disturbed, which would reduce impacts to American badgers, burrowing owls, and Monterey dusky-footed woodrats.

Because Alternative 3b would involve construction, ground disturbance, and tree removal, Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-6 would still apply. However, impacts would be reduced compared to the proposed project and would be less than significant with mitigation.

Greenhouse Gas Emissions

The proposed project's GHG emissions would be less than significant and no mitigation measures are required. For informational purposes, GHG emissions of the proposed project were estimated using CalEEMod version 2022.1.1.16, consistent with the modeling of Alternative 3b emissions. These estimates are not intended to supersede the GHG modeling provided in Chapter 8.0, *Greenhouse Gas Emissions*, of the Draft SEIR. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis. The proposed project would result in a total of 617 MT/year of CO_2e during construction and 1,005 MT/year of CO_2e during operation (please refer to Table 17-5 and Table 17-6).

As shown in Table 17-5 and Table 17-6 under *Air Quality* for Alternative 3b, the project would generate approximately 560 MT/year of CO_2e during construction and 569 MT/year of CO_2e during operation. Neither the County of Monterey, MBARD, nor any other state or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. Emissions associated with Alternative 3b would be less than those of the proposed project, and impacts would be less than significant. Therefore, greenhouse gas emissions associated with Alternative 3b would be reduced compared to the proposed project and impacts would be less than significant.

Transportation and Traffic

As a combined assisted living facility (100 beds) and detached assisted living units (26 units; 42 beds), based on ITE trip generation rates for each category, the proposed project would generate approximately 362 daily trips (266 for assisted living facility and 96 for senior adult housing units). The proposed project would result in less-than-significant impacts to area intersections and roadways segments of River Road. However, the proposed project would result in a significant and unavoidable impact of adding additional traffic to SR 68.

A Traffic Impact Analysis was prepared for Alternative 3b by Keith Higgins, Traffic Engineer, in December 2022. The Traffic Impact Analysis was revised with a memo in March 2022 to estimate traffic impacts associated with up to 30 residences. The Traffic Impact Analysis and memo are included as Appendix B.

Alternative 3b would be expected to generate trips at a similar rate to existing residences near the project site. Up to 30 lots facilitated by Alternative 3b would be expected to generate approximately 264 daily trips, with 20 AM peak hour trips and 26 PM peak hour trips. This is a reduction of 98 trips per day, or 27 percent fewer trips compared to the proposed project. The addition of these trips to area roadways would be expected to result in imperceptible increases in delay on area roadways,

and would not result in a change in level of service from existing conditions. Refer to Appendix B for additional detail.

The proposed project was determined to result in a significant and unavoidable impact associated with adding additional traffic to SR 68. Approximately 14 percent of trips associated with Alternative 3b would be added to the two-lane segment of SR 68, which would represent one peak hour trip on average (Appendix B), the same as under the proposed project. Therefore, as SR 68 continues to operate at LOS F during peak hours, Alternative 3b would also result in significant and unavoidable impacts to the level of service of SR 68, and impacts would be similar to the proposed project. No feasible mitigation measures are available to reduce this impact.

Water Supply

The proposed project would have an estimated water demand of 11.376 AFY. The maximum of 30 residences that would be constructed under Alternative 3b would be expected to have a water demand of approximately 5.0 AFY (Monterey Peninsula Water Management District 2022),[5] which is less than the water demand of the proposed project. Therefore, Alternative 3b would result in a less-than-significant impact to water supply, and impacts would be lesser than the proposed project.

Alternative 4: Reduced Project

Alternative Description

The "reduced project" alternative includes a reduced development footprint. For conceptual purposes, Alternative 4 eliminates the casitas from the proposed project. This would result in the loss of 26 living units with 42 beds, representing 30 percent of the total beds of the proposed project, and would result in a proportionate reduction in environmental impacts. Therefore, under this reduced project scenario, development on the project site would include the assisted living facility and memory care living facility, and other associated site improvements.

Aesthetics

The proposed project would impact scenic vistas and the visual character of the site, and would introduce new sources of light and glare to the project site and vicinity. Impacts to scenic vistas and the introduction of new sources of light and glare would be potentially significant impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AES-1, AES-2, AES-3, and AES-4.

Alternative 4 would have similar, albeit slightly less, aesthetic-related impacts as the proposed project, as development on the site of the assisted living facility and memory care facility would still be within the public viewshed from scenic vista points and would also introduce new sources of light and glare to the project site and vicinity. Mitigation measures applicable to the proposed project would also apply to Alternative 4.

Air Quality

The proposed project would have air quality-related impacts related to emissions during construction of the proposed project on the site. These impacts would be potentially significant

[5] Rates based on the October 2018 to September 2019 actual residential water usage in Monterey County (510,364,680 gallons per 9,399 residential units), converted to acre-feet.

impacts, but would be reduced to less-than-significant levels with the application of Mitigation Measures AQ-1, AQ-2, AQ-3, and AQ-4.

Alternative 4 would have similar air quality-related impacts as the proposed project, but to a lesser extent based on a reduced amount of construction activities that would occur on the site. The estimated construction emissions associated with Alternative 4 are shown below in Table 17-7 and are compared to maximum emissions thresholds established by MBARD. For informational purposes, construction emissions of the proposed project were estimated using CalEEMod version 2022.1.1.16, consistent with the modeling of Alternative 4 emissions. These estimates are not intended to supersede the air quality modeling provided in Chapter 6.0, *Air Quality*, of the Draft SEIR. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis.

Table 17-7 Estimated Construction Emissions of Alternative 4

	Maximum Daily Emissions (lbs/day)						Annual Emissions (MT/year)
	ROG	NO_x	PM_{10}	CO	SO_2	$PM_{2.5}$	CO_2e
Proposed Project Maximum Construction Emissions[1]	196	58	26	41	<1	13	617
Alternative 4: Construction Year 2024	4	52	25	39	<1	13	543
Alternative 4: Construction Year 2025	65	11	1	16	<0.1	<1	126
MBARD Thresholds	**137**	**137**	**82**	**N/A**	**152**	**N/A**	**N/A**

lbs/day = pounds per day; MT/year = metric tons per year; ROG = reactive organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; CO2e = carbon dioxide equivalents; N/A = not applicable; MBARD = Monterey Bay Air Resources District

Notes: Emissions estimates are rounded to the nearest whole number. Emissions modeling was completed using CalEEMod. See Appendix A for modeling results.

Source: MBARD 2008

As shown above in Table 17-7, emissions associated with Alternative 4 would not exceed thresholds established by MBARD, and would be reduced compared to the proposed project. However, similar to the proposed project, grading and construction of the reduced senior assisted living facilities would occur directly adjacent to the existing residences west of the project site, and generation of air emissions in proximity to these receivers could be significant. Mitigation measures applicable to the proposed project would also apply to Alternative 4.

In operation, Alternative 4 would result in reduced emissions compared to the proposed project. Table 17-8 shows estimated operational emissions associated with Alternative 4. For informational purposes, operational emissions of the proposed project were estimated using CalEEMod version 2022.1.1.16, consistent with the modeling of Alternative 4 emissions. These estimates are not intended to supersede the air quality modeling provided in Chapter 6.0, *Air Quality*, of the Draft SEIR. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis.

Table 17-8 Estimated Operational Emissions of Alternative 4

	ROG	NO_x	PM_{10}	CO	SO_2	$PM_{2.5}$	CO_2e

Proposed Project Annual Emissions[1] (tpy)	1	<1	<1	4	<0.1	<1	1,005
Alternative 4 Annual Emissions (MT/year)	<1	<1	<1	3	<0.1	<1	685

lbs/day = pounds per day; MT/year = metric tons per year; ROG = reactive organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; CO2e = carbon dioxide equivalents

Notes: Emissions estimates are rounded to the nearest whole number. Emissions modeling was completed using CalEEMod. See Appendix A for modeling results.

[1] Proposed project air quality emissions were modeled here using CalEEMod version 2022.1.1.16 for informational purposes. The air quality emissions in Chapter 6.0, *Air Quality*, of the Draft SEIR used an older version of the model, which is no longer recommended for use.

As shown above, Alternative 4 would not generate considerable amounts of air pollutants in operation. Operational air emissions would be reduced as compared to the proposed project.

Air quality impacts of Alternative 4 would be reduced as compared to the proposed project and would be less than significant with Mitigation Measures AQ-1, AQ-2, AQ-3, and AQ-4, similar to the proposed project.

Biological Resources

The proposed project would impact biological resources, including potential loss or disturbance of American badgers, potential loss or disturbance of burrowing owls, potential loss or disturbance of Monterey dusky-footed woodrats, potential loss or disturbance of special-status bats, and potential loss or disturbance of nesting birds. All potential impacts can be reduced to less-than-significant levels with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-6. The proposed project would also have a less-than-significant impact on impeding the moment of common wildlife.

Alternative 4 would have similar impacts to biological resources as the proposed project, but to a lesser extent based on a reduced amount of development which would occur on the site. Mitigation measures applicable to the proposed project would also apply to Alternative 4.

Greenhouse Gas Emissions

The proposed project's greenhouse gas emissions would be less than significant and no mitigation measures are required. For informational purposes, GHG emissions of the proposed project were estimated using CalEEMod version 2022.1.1.16, consistent with the modeling of Alternative 4 emissions. These estimates are not intended to supersede the GHG modeling provided in Chapter 8.0, *Greenhouse Gas Emissions*, of the Draft SEIR. Rather, they are intended to standardize the emissions modeling outputs for equitable comparison within this alternatives analysis. The proposed project would result in a total of 617 MT/year of CO_2e during construction and 1,005 MT/year of CO_2e during operation (please refer to Table 17-7 and Table 17-8).

As shown in Table 17-7 and Table 17-8 above, Alternative 4 would generate approximately 669 MT/year of CO_2e during construction and 685 MT/year of CO_2e during operation. Neither the County of Monterey, MBARD, nor any other state or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project. Although emissions associated with Alternative 4 would be greater than the proposed project during construction, operational GHG emissions would be reduced as compared to the proposed project. ~~Alternative 4 would also result in greenhouse gas emissions that would be less than significant and no mitigation measures would be required. Furthermore, based on overall reduced~~

~~development on the site, greenhouse gas~~ Overall, GHG emission impacts from Alternative 4 would be less than the proposed project.

Transportation and Traffic

As a combined assisted living facility (100 beds) and detached senior adult housing units (26), based on ITE trip generation rates for each category, the proposed project would ~~generation~~ generate approximately 362 daily trips (266 for assisted living facility and 96 for senior adult housing units). The proposed project would result in less-than-significant impacts to area intersections and roadways segments of River Road. However, the proposed project would result in a significant and unavoidable impact of adding additional traffic to SR 68 in the AM and PM peak hours.

Based on ITE trip generation rates for assisted living facilities, Alternative 4 would generate approximately 266 daily trips, as compared to 362 daily trips of the proposed project. Alternative 4 would result in fewer impacts to traffic than the proposed project. However, Alternative 4 would also result in a significant and unavoidable impact.

Water Supply

The proposed project would have an estimated water demand of 11.376 AFY. Demand for water supply of Alternative 4 would be less than the proposed project, based on the overall reduction in development on the project site, reflecting an overall reduced water demand for the site. The estimated water demand for Alternative 4 would be 8.5 AFY. Alternative 4 would result in a less-than-significant impact on water supply, however to a lesser extent than the proposed project.

17.3 Alternatives Considered But Rejected

An alternative site was considered, but rejected from further consideration. The site is considered to be an appropriate location for the proposed project based upon the specific plan land use designation, County zoning designations, and the space available to allow the creation of a tranquil, park-like setting while also being located in a neighborhood setting. The proposed location also offers nearby amenities including hospitals and doctors on Romie Lane in ~~west~~ south Salinas, shopping, and regional roadway access.

Having an alternative access to the project site was also considered as an alternative, but rejected from further consideration. Alternative access either directly from River Road or as a new internal subdivision roadway would not decrease impacts of the proposed project and may result in increased impacts as compared to the proposed project, such as increased traffic, visual, biological, and impacts to recreational areas associated with entry from River Road.

17.4 Comparison of Alternatives

The alternatives are summarized and compared in a matrix format in ~~Table 17-1, Project Alternatives Summary.~~ Table 17-9.

~~Table 17-1~~ Table 17-9Project Alternatives Summary

Environmental Topic	Alternative 1: No Project/No Development	Alternative 2: No Project/ Min. Development	Alternative 3a: No Project/ Existing Zoning (40-Lot Subdivision)	Alternative 3b: Reduced No Project/ Existing Zoning (Up to a 30-Lot Subdivision)	Alternative 4: Reduced Project

Aesthetics	-	-	=	-	-
Air Quality	-	-	=-	-	-
Biological Resources	-	-	=	-	-=
Greenhouse Gas Emissions	-	-	=-	-	-
Transportation and Traffic	-	-	+-	-	-
Water Supply	-	-	+-	-	-
Project Objectives	Not Met	Not Met	Not Partially Met	Partially Met	Partially Met

Source: EMC Planning Group 2017

Note: (-) less reduced impact, (=) similar impact, (+) greater impact

The no project/no development alternative (Alternative 1) would result in no potential adverse environmental impacts, but would not meet any of the proposed project objectives. The no project/minimum development alternative (Alternative 2) would result in less environmental impacts than the proposed project, but would not meet any of the proposed project's objectives. The no project/existing zoning (40-unit subdivision) alternative (Alternative 3a) would result in lesser or a similar level of impacts as the proposed project; however, and would not meet the objectives of the proposed project for the provision of housing. The reduced no project/existing zoning (30-unit subdivision) alternative (Alternative 3b) would result in less environmental impacts than the proposed project, and would meet most of the objectives of the proposed project. The reduced project (Alternative 4) would have an overall reduction in intensity of potential impacts based on the overall reduction in development on the project site, but the reduced project alternative would only partially meet the objectives of the proposed project and may prove to be economically infeasible. Therefore, the environmentally superior alternative that would partially meet the objectives of the proposed project would be the reduced no project/existing zoning (30-unit subdivision) alternative (Alternative 3b). reduced project alternative.

18.0 Sources

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RIVERVIEW AT LAS PALMAS RESIDENTIAL SUBDIVISION TRANSPORTATION IMPACT ANALYSIS

DRAFT REPORT

MONTEREY COUNTY, CALIFORNIA

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TABLE OF CONTENTS

1 INTRODUCTION 1

1.2 Scope of Work 1

1.3 Criteria for Determination of Significance of Project Impacts 2

1.4 Level of Service Standards 2

1.5 Traffic Operation Evaluation Methodologies 2

1.6 Significance Criteria 3

1.7 Funding for Transportation Improvements 4

2 EXISTING TRAFFIC CONDITIONS 5

2.1 Existing Roadway Network 5

2.2 Existing Intersection Operations 5

2.3 Existing Road Segment Operations 6

2.4 Existing Transit Service 7

2.5 Existing Bicycle Facilities 7

3 PROJECT TRIP GENERATION, DISTRIBUTION, AND ASSIGNMENT 8

3.1 Project Trip Generation 8

3.2 Project Trip Distribution and Assignment 9

4 EXISTING PLUS PROJECT TRAFFIC CONDITIONS 10

4.1 Existing Plus Project Intersection Operations 10

4.2 Existing Plus Project Road Segment Operations 10

5 CUMULATIVE PLUS PROJECT TRAFFIC CONDITIONS 15

5.1 2030 Cumulative Traffic Volume Forecasts 15

5.2 Cumulative Plus Project Traffic Volumes 15

5.3 Cumulative Plus Project Intersection Operations 15

5.4 Cumulative Plus Project Road Segment Operations 16

6 PROJECT AND CUMULATIVE IMPACTS AND CORRESPONDING RECOMMENDED IMPROVEMENTS 19

6.1 Project Impacts and Mitigations 19

6.2 Cumulative Impacts and Mitigations..... 19

6.3 Cumulative Improvements..... 20

EXHIBITS

1. Project Location Map

2. Project Site Plan

3. Study Intersections

4. AM & PM Peak Hour Volumes and Project Trip Assignment Using Las Palmas 1 Trip Rates

5. AM & PM Peak Hour Volumes and Project Trip Assignment Using ITE Single Family Detached Trip Rates

6. Intersection Levels of Service

7. Project Trip Generation

8. Project Trip Distribution

APPENDICES

A Level of Service Description for Signalized Intersections

B Traffic Count Data

C Level of Service Calculation Worksheets

1 INTRODUCTION

This traffic study analyzes the impacts associated with the development of the Riverview at Las Palmas Residential Subdivision (Project) in Monterey County, immediately west of the Las Palmas 1 residential neighborhood. The project is proposed to include 28 single family homes with access via an extension of Woodridge Court. **Exhibit 1** shows the location of the proposed project. The proposed site plan is included as **Exhibit 2**.

1.2 Scope of Work

This study is an update of the "Riverview at Las Palmas Senior Housing Traffic Impact Analysis – Draft Report," Keith Higgins Traffic Engineer, June 20, 2017 (Senior Housing Traffic Study). It includes the evaluation of the following intersections and road segments:

Intersections:

1. Reservation Road / Highway 68 WB Ramps
2. River Road / Highway 68 EB Ramps
3. Las Palmas Road / River Road

Road Segments:

1. Highway 68 between Laureles Grade and the Spreckels Boulevard Interchange

The study intersections are shown in **Exhibit 3**. Beyond the limits of the study area, the project trips will disperse onto various local streets and roads or onto regional facilities. The local intersections included in the analysis were identified as potentially experiencing the greatest impact from the project.

Weekday AM and PM peak hour traffic operations are analyzed for the following conditions:

1. Existing Conditions
2. Existing Plus Project Conditions
3. Cumulative Plus Project Conditions

Las Palmas 1 Entrance Traffic Operations:

The Project will increase traffic at the existing Las Palmas 1 security gate. An analysis of the effect of the Project on queuing and the potential of queue spillback onto River Road is provided.

1.3 Criteria for Determination of Significance of Project Impacts

As of July 1, 2020, new CEQA guidelines have replaced congestion-based metrics, such as auto delay and level of service, with Vehicle Miles Traveled (VMT) as the basis for determining significant impacts, unless the guidelines provide specific exceptions. However, because this project is still being reviewed under the policies in place in 2017 with the "Riverview at Las Palmas Senior Housing Traffic Impact Analysis Administrative Draft Report," Keith Higgins Traffic Engineer, June 20, 2017 (included in the "Riverview at Las Palmas Assisted Living Senior Project Subsequent EIR prepared in 2017, circulated for public review from March 12, 2018 through April 25, 2018 and certified February 12, 2020) the impact analysis is based on the auto delay and level of service criteria in place at that time.

1.4 Level of Service Standards

Intersection traffic operations were evaluated based on the Level of Service (LOS) concept, and the LOS standard adopted by Monterey County and Caltrans for each intersection. LOS is a qualitative description of an intersection's or road segment's operation, ranging from LOS A to LOS F. Level of service "A" represents free flow un-congested traffic conditions. Level of service "F" represents highly congested traffic conditions with what is commonly considered unacceptable delay to vehicles at intersections. The intermediate levels of service represent incremental levels of congestion and delay between these two extremes. All three study intersections are signalized. LOS descriptions for signalized intersections are included as **Appendix A**.

The study area falls within the jurisdiction of two public agencies, Monterey County and Caltrans. Level of service standards and impact significance criteria adopted by each public agency have been used as appropriate.

For this study, the following level of service thresholds have been used:

1. The County of Monterey LOS "D" standard has been applied to intersections under the jurisdiction of the County of Monterey.

2. The Caltrans level of service standard is the LOS C/D threshold. The Caltrans LOS C/D standard has been applied to state-controlled intersections and road segments.

1.5 Traffic Operation Evaluation Methodologies

Intersection traffic operations were evaluated using the Synchro© traffic analysis software (Version 10) using both the 2010 and 2000 Highway Capacity Manual (HCM) methodologies. The average delay is then correlated to a level of service. For two-way stop-controlled intersections, only the vehicle delay for side street traffic is analyzed. LOS for each side street movement is based on the distribution of gaps in the major street

traffic stream and driver judgment in selecting gaps. Improvements are warranted when a side street approach reaches LOS F for two-way stop-controlled intersections.

When using the HCM 2010 and 2000 methods for the analysis of signalized and all-way stop-controlled intersections, the overall intersection delay is used to determine LOS.

1.6 Significance Criteria

The following significance criteria are used in this study:

County of Monterey

A significant impact at a signalized study intersection is defined by the "Monterey County Guide for the Preparation of Traffic Impact Studies," Monterey County Resource Management Agency – Public Works Department, March 28, 2014, to occur under the following conditions:

Signalized Intersections:

A significant impact would occur if a signalized intersection operating at LOS A, B, C, or D degrades to E or F. For intersections already operating at unacceptable level E, a significant impact would occur if a project increases the critical movement's volume-to-capacity ratio 0.01 or more during peak hours. If the intersection is already operating at LOS F, any increase (one vehicle) in the critical movement's volume-to-capacity ratio is considered significant.

One- or Two-Way Stop-Controlled Intersection:

A significant impact would occur at a side-street stop-controlled intersection if the side-street currently operating at LOS A, B, C, D or E pre-Project degrades to LOS F with Project traffic; or
If any traffic signal warrant is met with the addition of Project traffic; or
For side-streets already operating at LOS F under pre-Project conditions, the addition of any Project traffic during the deficient peak hour would be considered significant, regardless of its effects on delay.

Caltrans

In the "Guide for the Preparation of Traffic Impact Studies," State of California Department of Transportation, December 2002, any degradation in the performance measure below the cusp of C/D is considered a significant impact. If a facility is currently operating at or below LOS D, then any trips added represent a potential impact, and the performance measure should be brought back to predevelopment conditions. While a single trip added to a degraded facility is not usually reflected in the performance measure, Caltrans reserved the ability to consider a single trip as an impact.

1.7 Funding for Transportation Improvements

TAMC Measure X

In November 2016, Monterey County voters approved a 30-year, 3/8 cent sales tax measure to fund a broad range of transportation improvements. A total of $50,000,000 has been earmarked for Highway 68 improvements. This will be supplemented by State and Federal funds. TAMC is currently conducting corridor studies in cooperation with Caltrans to identify improvement options and to focus on options that will provide the most significant benefits to residents and the travelling public. Secondary benefits along Highway 68 will also be provided by the Marina-Salinas Multimodal Corridor improvements along Blanco Road, Reservation Road, and Imjin Parkway. This is an alternate commute route to Highway 68.

TAMC Regional Development Impact Fee

The Transportation Agency for Monterey County (TAMC) and its member jurisdictions have adopted a county-wide, regional development impact fee (RDIF) to cover the costs for studies and construction of many improvements throughout Monterey County. This impact fee, which went into effect on August 27, 2008, is applied to all new development within Monterey County. The governing document for the fee is the *Regional Impact Fee Nexus Study Update* (March 26, 2008) prepared by Kimley-Horn Associates, Inc. *The Regional Impact Fee Nexus Study Update* was updated again in 2018. The latest Strategic Expenditure Plan was prepared in 2020.

Transportation improvements in the immediate vicinity of the Project partially funded by the RDIF include the following.

1. Davis Road South - widening Davis Road to four lanes and constructing a four-lane bridge over the Salinas River.
2. SR 68 (State Route 68) Commuter Improvements. This will likely involve roundabouts at major intersections along SR 68 from Reservation Road to Highway 1. SR 68 may also be widened to four lanes for about one mile from the Toro Park interchange. Major funding for this project will be provided by the TAMC Sales Tax Measure and other

Monterey County Traffic Impact Fee

Monterey County also has a traffic impact fee which is described the "Monterey Countywide Traffic Impact Fee Nexus Study," Kimley Horn, August 1, 2014. Transportation improvements in the vicinity of the Project include the following.

1. G-17 Widening (Reservation Road) - Widen to four travel lanes with Class II bike lanes on Reservation Road from Davis Road to SR-68.
2. Harris Road Widening - Widen to four lanes on Harris Road from Harris Court to Salinas City Limit.

2 EXISTING TRAFFIC CONDITIONS

This section describes the existing street network relevant to the proposed project and the existing operational traffic conditions.

2.1 Existing Roadway Network

The major roadways in the vicinity of the proposed project include Highway 68, Reservation Road and River Road. These facilities are described below:

Highway 68 (SR 68) connects State Route 1 in Monterey and US 101 in Salinas. It is a 2-lane rural highway with a speed limit of 55 mph between SR 1 and just south of the Portola Drive interchange and carries about 25,000 vehicles per day. Highway 68 is a 4-lane freeway with 65 mph speed limit between the Portola Drive and Spreckels Boulevard interchanges where it carries about 35,000 vehicles per day. Highway 68 is a 4-lane divided highway with 55 mph speed limit from the Spreckels Boulevard interchange to Blanco Road in the City of Salinas where it carries about 28,500 vehicles per day. Inside the City of Salinas SR 68 becomes an arterial along South Main Street and John Street. It serves as a commuter and scenic tourist route between Salinas and the Monterey Peninsula.

Reservation Road is a two-lane rural road that connects Highway 68 to the City of Marina. South of Highway 68, Reservation Road becomes **River Road**, which is a 4-lane road from the Highway 68 / Reservation Road interchange to Las Palmas Road. It narrows to 2 lanes just east of Las Palmas Road. The River Road/Las Palmas Road and River Road/Las Palmas Parkway intersections are signalized. River Road provides access to residential neighborhoods and carries about 13,000 vehicles per day. The Highway 68 ramp intersections with Reservation Road and River Road are signalized.

2.2 Existing Intersection Operations

Weekday AM and PM peak hour turning movement counts at the study intersections were conducted in March and May 2017. The counts were reviewed and, where appropriate, balanced between intersections. Year 2017 peak hour traffic volumes are presented in **Section A** on **Exhibits 4 and 5**. Raw traffic count data is included in **Appendix B**.

The 2017 volumes are valid in 2021 because 2021 traffic volumes have generally decreased on roads in the study area since 2017, as indicated on **Table 1** on the following page. The only exception is Highway 68 east of the Reservation Road – River Road interchange, which is a four-lane freeway/expressway. It is understood that 2020 was an unusual year due to the Covid-19 pandemic. However, there has been a general annual decrease in traffic volumes since 2017 as well. 2016 volumes are included to provide additional recent historical context. Overall, 2017 appears to have experienced the highest volumes in any of the past five years, again with the exception of Highway 68 east of the Reservation Road – River Road interchange.

2021 daily traffic volumes will not be available from Caltrans or Monterey County Public Works until late Spring or early Summer of 2022. It is not anticipated that traffic volumes will exceed traffic volumes occurring in 2017 because little to no development has occurred in the past four years in the vicinity of Las Palmas or along the Highway 68 corridor. Also, traffic patterns have not fully returned to pre-pandemic conditions.

All three study intersections operate at acceptable level of service C or better under existing conditions and no improvements are recommended. Intersection levels of service are summarized in **Exhibit 6**. LOS calculation worksheets are included as **Appendix C**.

	Year					% Change 2017 to 2020
Road Segment	2016	2017	2018	2019	2020	
A. Highway 68						
1. W of River Rd.	25,700	27,900	25,000	22,300	25,000	-10.4%
2. E of River Rd.	29,800	32,400	29,000	34,100	35,000	+8.0%
B. Reservation Rd.						
1. N of Portola	9,600	10,400	10,300	9,900	9,200	-11.5%
C. River Rd.						
1. Portola to Riverview Ct.	14,100	15,100	14,200	13,100	12,000	-20.5%
2. Riverview Ct. to Berry Dr.	13,000	14,300	13,000	12,800	11,500	-19.6%

Table 1 – Daily Traffic Volumes on Area Roadways (2016-2020)

2.3 Existing Road Segment Operations

According to the 2010 Monterey County General Plan Environmental Impact Report, River Road operated in 2008 at LOS C with an Average Daily Traffic (ADT) of 14,810. The 2016 ADT was 14,100 between Highway 68 and Las Palmas Road. River Road operated at LOS D from Las Palmas Road to Las Palmas Parkway (2008 ADT of 11,750 and 2016 ADT of 13,000), according to the 2010 Monterey County General Plan Environmental Impact Report. Daily traffic volumes in 2016 were very similar to 2008 volumes.

Evening peak hour traffic volumes counted in 2017 for this study totaled 1,492 north of Las Palmas Road and 1,367 south of Las Palmas Road. Evening peak hour volumes generally represent about 10% of the daily total, so they are consistent with the 2016 daily volumes. River Road continues to operate at an acceptable level of service.

Highway 68 operates at LOS F according to the Monterey County 2010 General Plan. The Transportation Agency for Monterey County (TAMC), Caltrans and the County of Monterey has programmed major capacity and safety improvements to Highway 68, including roundabouts at currently signalized intersections. The candidate

improvements were identified in the "SR 26 Scenic Highway Plan," August 2017. Measure X, the Transportation Safety & Investment Plan is a sales tax measure that was approved by Monterey County voters in November 2016 provides about $50 million towards Highway 68 improvements for congestion relief and safety improvements. The TAMC Regional Development Impact Fee allocates an additional $4 million toward these improvements. Funding will also be provided by various State and Federal sources.

2.4 Existing Transit Service

The primary public transit service in the County of Monterey is provided by Monterey-Salinas Transit (MST). MST focuses on improving operational conditions through established bus routes and schedules that efficiently meet travel demands, reduce travel times, improve service reliability, and encourage bike-and-ride initiatives. All MST buses are wheelchair accessible and equipped with bike racks. In the vicinity of the project, bus routes are provided along Highway 68. There are no MST bus routes provided along River Road or Highway 68 near River Road.

2.5 Existing Bicycle Facilities

The County of Monterey has an adopted Bikeway Plan designating routes along roadways that can be used by bicycling commuters and recreational riders for safe access to major employers, shopping centers and schools. Three basic types of bicycle facilities are described below:

1. Bike path (Class I) - A completely separate right-of-way designed for the exclusive use of cyclists and pedestrians, with minimal crossings for motorists.
2. Bike lane (Class II) - A lane on a regular roadway, separated from the motorized vehicle right-of-way by paint striping, designated for the exclusive or semi-exclusive use of bicycles. Bike lanes allow one-way bike travel. Through travel by motor vehicles or pedestrians is prohibited but crossing by pedestrians and motorists is permitted.
3. Bike route (Class III) - Provides shared use of the roadway with motorists, designated by signs or permanent markings.

Highway 68 and River Road are designated as Cross County Bike Routes on the "2016 Monterey County Bike Map." Both have shoulders that function as bike lanes. No change in bike facilities is indicated in the Monterey County Active Transportation Plan adopted by the Transportation Agency for Monterey County (TAMC) Board in June 2018.

3 PROJECT TRIP GENERATION, DISTRIBUTION, AND ASSIGNMENT

The procedures for generating and assigning project trips to the local road network are described in this section.

3.1 Project Trip Generation

The Project is proposed to include 28 single family homes, which are expected to have a traffic generation rate similar to the existing homes in the adjacent Las Palmas 1 single family residential development. However, in order to be conservative, project trip generation is estimated based on the trip rate from the original Las Palmas Ranch environmental documents as well as two industry-standard trip generation rates for single family homes. The project trip generation estimate for the Project is estimated using all four sources. These are described below and summarized in **Exhibit 7.**

a. **Project Trip Generation Based on Actual Las Palmas 1 Trip Rates** - Las Palmas Road currently carries about 164 morning peak hour and 155 evening peak hour trips. Traffic counts conducted in November 2013 indicated that Las Palmas Road between River Road and Winding Creek Road carries about 1,837 daily trips. In addition, Riverview Court daily traffic totaled 386, for a grand total of 2,223 for the 313 homes in Las Palmas 1.

   Based on the November 2013 counts, the trip generation rate at Las Palmas 1 could be as low as 7.10 daily, 0.52 AM peak hour and 0.50 PM peak hour trips per home. This would result in the Project generating about 199 daily trips with 15 in the AM peak hour and 14 in the PM peak hour.

b. **Project Trip Generation Based on 1983 Las Palmas Specific Plan Trip Rates –** The 1983 Las Palmas Specific Plan assumed that single family development in Las Palmas would generate about 8.0 trips per day per home. This is higher than the rate of 7.5 trips per day home assumed in the "Las Palmas Ranch Traffic Study," Wilsey & Ham, 1981 and the "Final EIR for the River Road Area of Development Concentration (EIR 81-111), Incorporating the Final EIR for the Las Palmas Specific Plan (EIR 80-100), Grunwald, Crawford & Associates, Certified December 7, 1982. Based on the daily rate of 8.0, the Project is estimated to generate about 224 daily trips with 16 in the AM peak hour and 22 in the PM peak hour, assuming typical AM and PM peak hour percentages of daily traffic.

c. **Project Trip Generation Based on ITE Single-Family Attached Home Trip Rates –** The trip generation rates reported in the Trip Generation Manual, Institute of Transportation Engineers (ITE), 11th Edition, 2021, for Single-Family Attached Homes (ITE Land Use Category 215) are nearly identical to the apparent trip rates at Las Palmas 1. The rates for this land use category include 7.20 daily trips, 0.48 AM peak hour trips and 0.57 PM peak hour trips per home. Based on these rates, the Project is expected to generate about 202 daily trips with 13 in the AM peak hour and 16 in the PM peak hour.

d. **Project Trip Generation Based on ITE Single-Family Detached Home Trip Rates** - The most conservative trip generation rate for single family home subdivisions is based on Single-Family Detached Homes (ITE Land Use Category 210) which includes rates of 9.43 trips per day with 0.70 AM peak hour trips and 0.94 PM peak hour trips per home. This would result in the Project generating about 264 daily trips with 20 in the AM peak hour and 26 in the PM peak hour.

The daily trip estimate based on the above sources ranges from a low of 199 based on actual counts at Las Palmas 1 to a high of 264 using standard ITE trip generation rates for single family detached residential subdivisions. The AM trip generation estimate ranges from a low of 15 to a high of 20, which is a difference of 5 trips per hour. The PM peak hour trip generation estimate ranges from a low of 14 to a high of 26, which is a difference of 12 trips per hour.

As indicated on **Exhibit 7**, the previous Senior Housing Traffic Study estimated that the Riverview at Las Palmas Senior Housing Project (Senior Housing Project) would generate about 363 daily trips with 10 during the morning peak hour and 21 during the evening peak hour with shift changes during off-peak hours. The current Project will generate between 99 and 164 less daily trips than the Senior Housing Project. The Project will generate between 5 and 10 more AM peak hour trips and between 7 less and 5 more PM peak hour trips than the Senior Housing Project.

Qualitatively, there is no difference between the trip generation estimate based on the low rate using actual counts at Las Palmas 1 and the ITE Single-Family Attached trip generation estimate. It is reasonable to use any of the trip generation estimates. In order to consider the "best" and "worst" case assumptions, the high and low rates are analyzed.

3.2 Project Trip Distribution and Assignment

The project's trip distribution based on existing traffic patterns in the study area is shown graphically in **Exhibit 8**. Project trip assignments at the study intersections are shown on **Exhibit 4, Section B** assuming the Project generates trips at a similar rate as Las Palmas 1. Project trip assignments are also estimated assuming the most conservative ITE Single-Family Detached trip rate, which are shown on **Exhibit 5, Section B**. The following section includes analyses of Project impacts assuming both of the two trip generation assumptions.

4 EXISTING PLUS PROJECT TRAFFIC CONDITIONS

4.1 Existing Plus Project Intersection Operations

Section C in both **Exhibits 4** and **5**, illustrate the existing plus project AM and PM peak hour traffic volumes assuming the respective Las Palmas 1 and the Single-Family Detached trip generation rates.

All of three study intersections are projected to operate at acceptable levels of service under existing plus project traffic conditions and no improvements are recommended with either trip generation assumption. Intersection levels of service are summarized in **Exhibit 6**. Assuming the Single-Family Detached trip rates, the greatest increase in delay would be 0.8 seconds in the PM peak hour at the Reservation Road / Highway 68 Westbound Ramps intersection from 31.3 seconds of average delay under existing conditions to 32.1 seconds of average delay with the Project. This is imperceptible.

Exhibit 6 also provides the levels of service assuming the previous Riverview at Las Palmas Senior Housing project. The Reservation Road / Highway 68 Westbound Ramps intersection was expected to experience an increase from 31.3 seconds of average delay under existing conditions to 32.0 seconds of average delay with the Project. This is an increase of 0.7 seconds. The currently proposed single family home project will result in virtually the same insignificant impacts as anticipated with the previous Senior Housing project.

Project impacts at all study intersections will be insignificant. LOS calculation worksheets are included as **Appendix C**.

4.2 Existing Plus Project Road Segment Operations

a. River Road

The Project will add 14 AM peak hour trips and 13 PM peak hour trips to the four-lane segment of River Road between Highway 68 and Las Palmas Road assuming the Las Palmas 1 trip rates.

The Project will add 19 AM peak hour trips and 25 PM peak hour trips to the four-lane segment of River Road between Highway 68 and Las Palmas Road assuming the Single-Family Detached trip rates.

The Project will add 1 AM and 1 PM peak hour trip to the two-lane segment of River Road between Las Palmas Road and Las Palmas Parkway assuming either of the two trip generation rates. The Project will have no effect on the existing acceptable levels of service.

b. Highway 68

The Project will add between about 2 morning peak hour trips and 2 evening peak hour trips to the two-lane section of Highway 68 immediately west of the Toro Park interchange assuming the same trip generation rate per home as Las Palmas 1. Project traffic will dissipate along the Highway 68 corridor at the many crossroads including Torero Drive, San Benancio Road, Corral de Tierra Road and Laureles Grade, resulting in one or less morning peak hour trip and about one or less evening peak hour trip west of Laureles Grade. Project traffic will probably be at or below one peak hour trip west of Highway 218. This is tabulated at the bottom of **Exhibit 6**.

Under the worst-case Single-Family Detached trip generation assumption, the Project will add about 3 morning peak hour trips and 4 evening peak hour trips to the two-lane segment of Highway 68 immediately west of the Toro Park interchange and 1 to 2 peak hour trips on segments further west. The Project will result in diminishing increases further to the west on Highway 68.

Highway 68 has been determined to currently operate at Level of Service F in the Monterey County General Plan. The Project will exceed the one-trip threshold on the two-lane section of Highway 68 between Toro Park and Highway 218. Using the Level of Service metric for analyzing land development transportation environmental impacts, the addition of a single peak hour trip is a significant impact. This is therefore a significant environmental impact, although the addition of one or two trips in an hour will be imperceptible. Project traffic will have no measurable effect on Highway 68 traffic operations.

The level of effect along Highway 68 is essentially the same regardless of which trip generation estimate is assumed. The level of effect along Highway 68 is also less on a daily basis than the previous Senior Housing Project.

The Project will pay the TAMC Regional Development Impact Fee which will represent the Project's fair share contribution toward Highway 68 improvements and improvements on other regional facilities.

c. Las Palmas 1 Neighborhood Streets

The Project site is located at the end of Woodridge Court. Woodridge Court connects to River Run Road, which connects to Las Palmas Road, which provides access to and from River Road. Woodridge Court and River Run Court are local streets.

- **Las Palmas Road** functions as a collector street, providing access to and from the project will add traffic to each of these streets. Las Palmas Road currently carries about 164 morning peak hour and 155 evening peak hour trips. Traffic counts conducted in November 2013 indicated that Las Palmas Road between River Road and Winding Creek Road carries about 1,837 daily trips. Riverview Court daily traffic totaled 386, for a grand total of 2,223 for the 313 homes in Las Palmas 1. Based on these counts, the daily trip generation rate is about 7.1 trips per day per home in Las Palmas 1.

  Las Palmas Road has no homes along its frontage. Four perpendicular parking stalls are currently located at the west leg of the Winding Creek Road intersection. Otherwise, there is no parking along this street. Two lane collector streets have a capacity of over 10,000 vehicles per day. It has a width of 40 feet, which corresponds to a secondary street in the Monterey County Standard Details, which has a very conservative threshold of carrying up to 3,000 vehicles per day. Level of Service C (LOS C) was the General Plan policy in effect at the time of the approval of the Las Palmas Specific Plan. This threshold therefore corresponds with LOS C.

  Assuming this rate applies to all subareas within Las Palmas 1, the daily trip total for Las Palmas Road between Winding Creek Road and River Run Road is about 1,200 vehicles per day. This is 60% below the LOS C capacity normally attributable to collector streets as well as the Monterey County threshold of 3,000 vehicles per day.

  The Project will result in Las Palmas Road carrying up to 2,487 vehicles per day between River Road and Winding Creek Road and up to 1,399 vehicles per day between Winding Creek Road and River Run Road. Las Palmas Road will continue to operate at LOS A with addition of Project traffic. These estimates assume the most conservative Project trip generation estimates.

- **River Run Road** carries about 950 vehicles per day between Las Palmas Road and Woodbridge Court. River Run Road is a local street. It has a width of 38 feet, which is about midway between a secondary street (40 feet width) with a LOS C threshold of 3,000 and a tertiary street (34 feet width) with a LOS C threshold of 1,000. This section of street could therefore be considered a hybrid with a LOS C threshold of 2,000 vehicles per day. Functionally, it currently provides the sole access to over 130 homes plus the Corey House and the remaining parcel that is the site of the proposed project (earmarked for approximately 40 homes in the original Las Palmas Specific Plan). River Run Road with the buildout of the current Project would be estimated to carry a maximum of about 1,214 vehicles per day (40% below the LOS C threshold). On that basis, River Run Road will continue to operate at LOS A-B.

A final consideration for River Run Road is a comparison of anticipated traffic volumes with traffic volume thresholds used by nearby municipalities in neighborhood traffic management and traffic calming policies. Monterey County does not have a policy. The City of Salinas recently adopted the "City of Salinas Neighborhood Traffic Management Program," November 2008, that states on page 61 that, "If traffic volumes on residential streets are projected to be less than 1,500 vehicles per day (vpd), then no action is needed, nor will it be taken." The "City of Seaside Traffic Calming Program", 2011, page 7 states that streets carrying more than 1,600 vehicles per day are eligible for traffic calming. Volumes under 1,600 vehicles per day are within a reasonable level for a residential street. Both policies indicate that collector streets are not eligible for traffic calming. The anticipated worst case volume of 1,214 on River Run Road is below the threshold for both policies and would be considered within an acceptable traffic volume for a local residential street.

- **Woodbridge Court** currently does not provide access to any residences. It has a width of 28 feet, which is similar to a County Loop street. It carries occasional traffic primarily associated with the Corey House and maintenance vehicles. It will carry all of the Project's traffic, which is expected to total about 264 vehicles per day assuming the worst case trip generation rate. This street will carry volumes well within acceptable levels for a County Loop Street, which provides access to 30 homes or less.

The table below summarizes existing and existing plus project daily traffic volumes along the access route between the project site and River Road.

Two intersections exist along the project's access route to and from River Road.

1. The Las Palmas Road / River Run Road intersection is a T-intersection that is stop-controlled on the Las Palmas Road approach. Traffic volumes are well with LOS A on both intersecting streets. No capacity or traffic control improvements are currently warranted. The project will add only incrementally to existing volumes. The Las Palmas Homeowners Association should consider adding stop signs on the River Run Road approaches, since these are the lower volume approaches. This would provide all-way stop control. This would give equal right-of-way priority to the Las Palmas Road approach, which carries the highest volume of the three approaches.

2. The River Run Road / Woodbridge Court intersection has stop control on the River Run Road approach. This is the highest volume approach at the intersection. The Las Palmas Homeowners Association should consider adding stop control on the Woodbridge Court approach to control traffic exiting from the Project. All-way stop control should also be considered.

Street Name – Segment Limits	Street Classification & LOS C Threshold	No. of Homes Along Frontage	Existing ADT and LOS	Project ADT *	Existing Plus Project ADT-LOS*
Las Palmas Rd – River Rd to Winding Creek	Collector/Secondary – 3,000	0	2,223-A	199/264	2,422–A/ 2,487-A
Las Palmas Rd – Winding Creek to River Run	Collector/Secondary – 3,000	0	1,200–A	199/264	1,399–A/ 1,264-A
River Run Rd – Las Palmas to Woodbridge	Local/an average of Secondary and Tertiary - 2,000	2	950–A	199/264	1,149-A/ 1,214 A
Woodbridge Ct – River Run to Project	Loop - 300	0	0 (nil)–A	199/264	199–A/ 264-A

Note: * - Existing Plus Project ADT and LOS – Based on Las Palmas 1 Trip Rates / Based on ITE Single Family Detached Trip Rates

Table 2 – Las Palmas Neighborhood Daily Volumes and Quality of Life Levels of Service

The above stop-sign additions are not required to be implemented by the Project because the Project does not result in an operational deficiency at these intersections. They are only recommendations that would provide more clarity regarding right-of-way prioritization.

5 CUMULATIVE PLUS PROJECT TRAFFIC CONDITIONS

This section describes the analysis and results for 2030 cumulative conditions.

5.1 2030 Cumulative Traffic Volume Forecasts

Future traffic growth projections for the study area were derived from 2030 traffic volume projections in the Monterey County 2010 General Plan. This is equivalent to an increase of 15% above existing traffic volumes. This is more conservative than the projections developed for Highway 68 in the *State Route 68 Scenic Highway Plan* being prepared by Kimley-Horn, which were based on the Fort Ord Reuse Authority (FORA) travel demand model that projected slightly less than 10% growth along the Highway 68 corridor between the years 2016 and 2035. The 15% increase is also applied to Las Palmas Road traffic although no development in addition to the Project is anticipated that will be served by Las Palmas Road. It accounts for changes in demographics in the future that could result in a higher trip generation rate for existing Las Palmas 1 residences than current conditions.

5.2 Cumulative Plus Project Traffic Volumes

The trips generated by the proposed project were added to the 2030 cumulative traffic volumes to estimate the cumulative plus project AM and PM peak hour traffic volumes shown in **Exhibits 4** and **5** for the two Project trip generation assumptions.

5.3 Cumulative Plus Project Intersection Operations

Two study intersections are projected to operate at unacceptable levels of service under cumulative plus traffic conditions assuming both Project trip generation assumptions. The average peak hour delay is about 0.2 seconds greater based on the conservative Single-Family Detached trip generation estimate than the delay from the previously proposed Senior Housing project. These are imperceptible differences. Intersection levels of service are summarized in **Exhibit 6**. LOS calculation worksheets are included as **Appendix C**.

1. The Reservation Road / Highway 68 WB Ramp intersection is projected to operate at an unacceptable LOS D during the PM peak hour under cumulative plus project traffic conditions.

2. The River Road / Highway 68 EB Ramp intersection is projected to operate at an unacceptable LOS D during the AM peak hour under cumulative plus project traffic conditions.

5.4 Cumulative Plus Project Road Segment Operations

River Road is expected to continue to operate at LOS C between Highway 68 and Las Palmas Road and LOS D from Las Palmas Road to Las Palmas Parkway under 2030 Cumulative Conditions, according to the 2010 Monterey County General Plan Environmental Impact Report. These are acceptable levels of service.

As previously stated, Highway 68 has been determined to currently operate at LOS F in the Monterey County 2010 General Plan. The projected 10% increase in traffic volumes under cumulative conditions would exacerbate these conditions.

6 PROJECT IMPACTS ON LAS PALMAS 1 ENTRANCE TRAFFIC OPERATIONS

The Project will increase traffic on Las Palmas Road, which includes a security gate. Currently the entrance is controlled by a security guard only during daylight hours and is not controlled from about 3:30 PM through the rest of the evening. The security guard instead changes to patrol on the subdivision. Based on previous observations in 2017 of traffic at Las Palmas 1, traffic entered unimpeded. Evening peak hour traffic was observed on Thursday, January 6, 2022, to confirm previous observations. No queues or any traffic operational issues were noted during the recent field visit. The security gate was uncontrolled and the security vehicle was observed to be patrolling the subdivision during the field visit.

The Project will only add about 16 entering vehicles in the PM peak hour, which is about one vehicle every four minutes. This is practically imperceptible and is not expected to change traffic operations at the Las Palmas 1 main entrance.

Although there are no existing queuing issues and none are expected in the future based on existing traffic and security procedures, a person could control entering traffic in the future. To determine the potential for vehicle queues spilling onto River Road, a queuing analysis was performed. It assumes that the security gate is manually controlled during the PM peak hour, which is a worst case condition that may not happen.

Morning and evening peak hour traffic entering Las Palmas 1 on Las Palmas Road is tabulated for Existing, Existing plus Project and Cumulative plus Project conditions on **Table 3** on the following page. These are referenced from the peak hour volumes at the River Road / Las Palmas Road intersection illustrated on **Exhibit 5** for the Project worst case trip generation rate of Single Family Detached. It will be noted that the cumulative entrance volumes include a 15% background growth factor as an allowance for increased Las Palmas 1 trip generation in the future if demographic changes occur.

The probability of queue spillover is based on standard queuing theory assuming a random arrival rate for entering traffic during the AM and PM peak hour and a uniform service rate of 600 vehicles per hour (one vehicle every 5 seconds) to be processed through the security entrance. The calculations are included in **Appendix D**.

Under normal circumstance, queues would never extend onto River Road in the AM or PM peak hours with the Project as well as under Cumulative plus Project conditions. The longest queues would probably be 3 vehicles during the PM peak hour when they would occur between 0.5% and 1% of the time. The queue lengths would be qualitatively the same under Cumulative plus Project as Existing conditions.

Scenario	SB River Rights	NB River Lefts	Total Entering Volumes	Increase Above Existing (Volumes)	Increase Above Existing (Percent)	Probability of Queue Spillover: Onto Las Palmas Rd Xwalk (5 cars)	Probability of Queue Spillover: Longest Queue (Cars) Based on 0.5% - 1.0%) Probability
Existing							
AM	33	8	41			0.0%	2
PM	97	9	106			0.0%	3
Existing + Project							
AM	40	8	48	5	17%	0.0%	2
PM	112	10	122	8	15%	0.0%	3
Cumulative + Project							
AM	45	9	54	13	32%	0.0%	2
PM	127	11	138	32	30%	0.0%	3

Notes: 1. * - Based on queuing calculations in **Appendix D**.

2. A total of 5 cars are assumed to be able to be stored between the existing gate house and the crosswalk across Las Palmas Road at River Road.
3. A uniform service rate of 600 vehicles per hour (one vehicle every 5 seconds) is assumed, based on the average of the typical service rate of a clear aisle with no control and cashier, flat fee, no gate, and no information given.

Table 3 – Las Palmas Road Gated Entrance Queue Estimates

Apparently, some queuing issues on Las Palmas Road occur during school bus pickup and drop. It is uncertain what the frequency and magnitude of this situation. However, it will not be qualitatively affected by the addition of Project traffic.

6 PROJECT AND CUMULATIVE IMPACTS AND CORRESPONDING RECOMMENDED IMPROVEMENTS

6.1 Project Impacts and Mitigations

a. Project Traffic Operations Impacts

All the study intersections are forecasted to operate at acceptable levels of service under Existing plus Project traffic conditions and no improvements are required. The level of effect is the same or lower than forecasted for the previous Senior Housing project.

Project traffic will have no effect on Highway 68 traffic operations. However, Highway 68 has been determined to currently operate at Level of Service F in the Monterey County General Plan. Monterey County and Caltrans consider the addition of a single peak hour trip to be a significant impact. As discussed in the Existing Plus Project Conditions section of this report, TAMC, Caltrans, and Monterey County have funding and are studying a variety of operational improvements along the corridor.

b. Project Contributions to Transportation Improvements

The project will pay TAMC regional development impact fees that will be able to be applied toward the above Highway 68 improvements. The Project will also pay the Monterey County Traffic Impact Fee. The payment of impact fees will represent an adequate contribution toward improvements to offset the Project's impacts on traffic operations on Highway 68 and elsewhere on the State highway system and nearby County roads.

6.2 Cumulative Impacts and Mitigations

The following study facilities are projected to operate at unacceptable levels of service under cumulative plus traffic conditions.

1. The Reservation Road / Highway 68 WB Ramp intersection is projected to operate at an unacceptable LOS D during the PM peak hour.

2. The River Road / Highway 68 EB Ramp intersection is projected to operate at an unacceptable LOS D during the AM peak hour.

3. Highway 68 is projected to operate at LOS F under cumulative traffic conditions.

The proposed project will contribute incrementally to the above cumulative impacts. The project will add only incrementally to this cumulative impact and should pay a proportionate share of the cost of the following improvements.

6.3 Cumulative Improvements

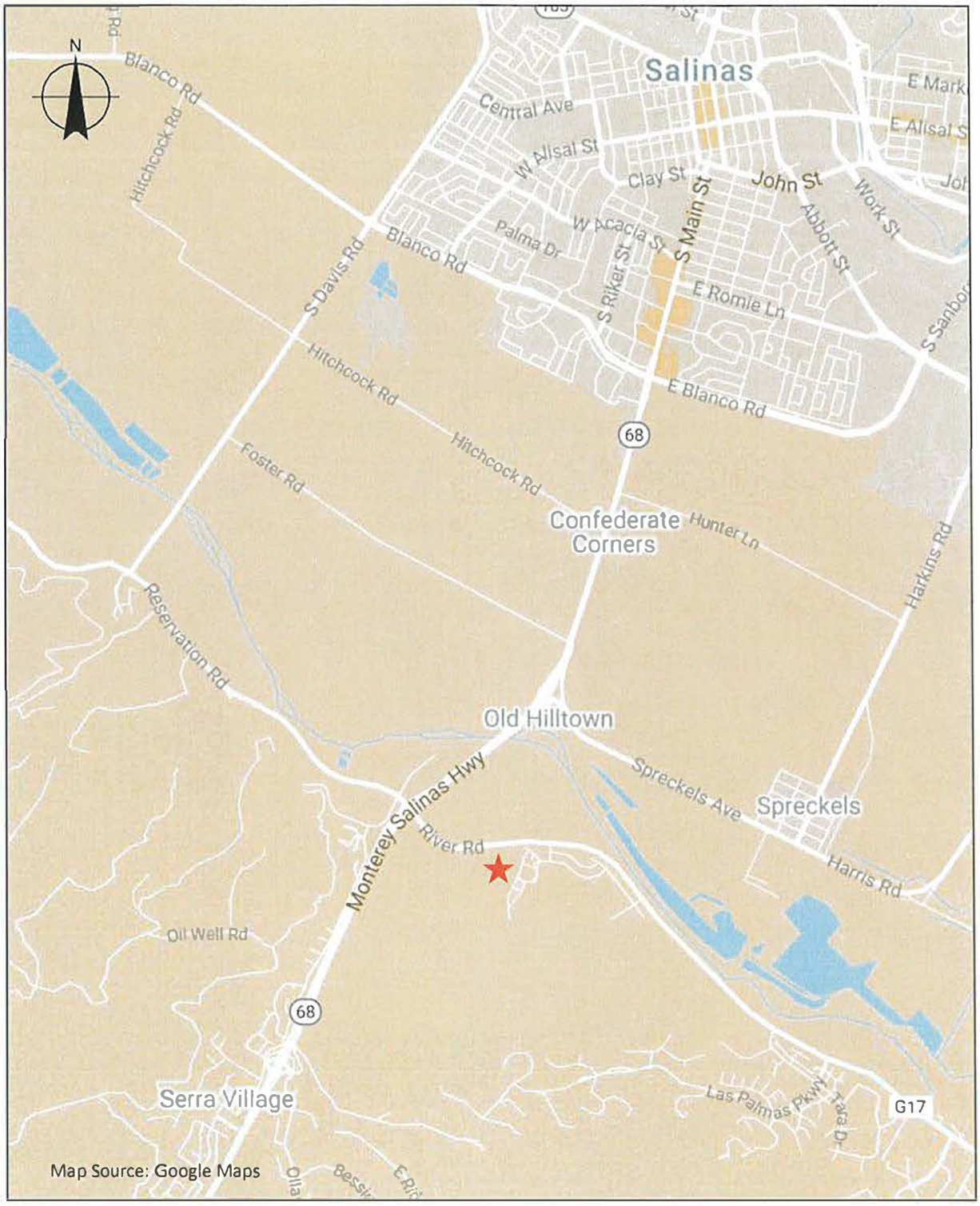
1. The following improvements would result in acceptable levels of service at the study intersections Impacts 1 and 2 described in Section 6.1 above. These options both appear to be feasible. They will require Monterey County and Caltrans to evaluate the pros and cons of each alternative.

   Improvement Option 1: Add a dedicated southbound right-turn lane at the Reservation Road / Highway 68 WB Ramps intersection and a second southbound left-turn lane at the River Road / Highway 68 EB Ramps intersection, or;

   Improvement Option 2: Convert the Reservation Road / Highway 68 WB Ramps and River Road / Highway 68 EB Ramps intersections to roundabouts. A roundabout appears to be able to be implemented with no physical constrains at the EB Ramp intersection. However, the WB Ramp intersection would require right-of-way acquisition and construction that would be very close to existing office buildings on the northeast and northwest corners of the intersection. Special attention to this issue would need to be made when evaluating the feasibility of this alternative.

2. TAMC, Caltrans, and Monterey County will be implementing operational improvements to Highway 68 as described in "Section 2.3 Existing Conditions Road Segment Operations." The project will pay TAMC Regional Development Fees, which will represent its fair-share contribution to this improvement.

3. The project will be required to pay TAMC and County of Monterey traffic impact fees, which will represent its share of improvements to offset its contribution to County-wide cumulative impacts.

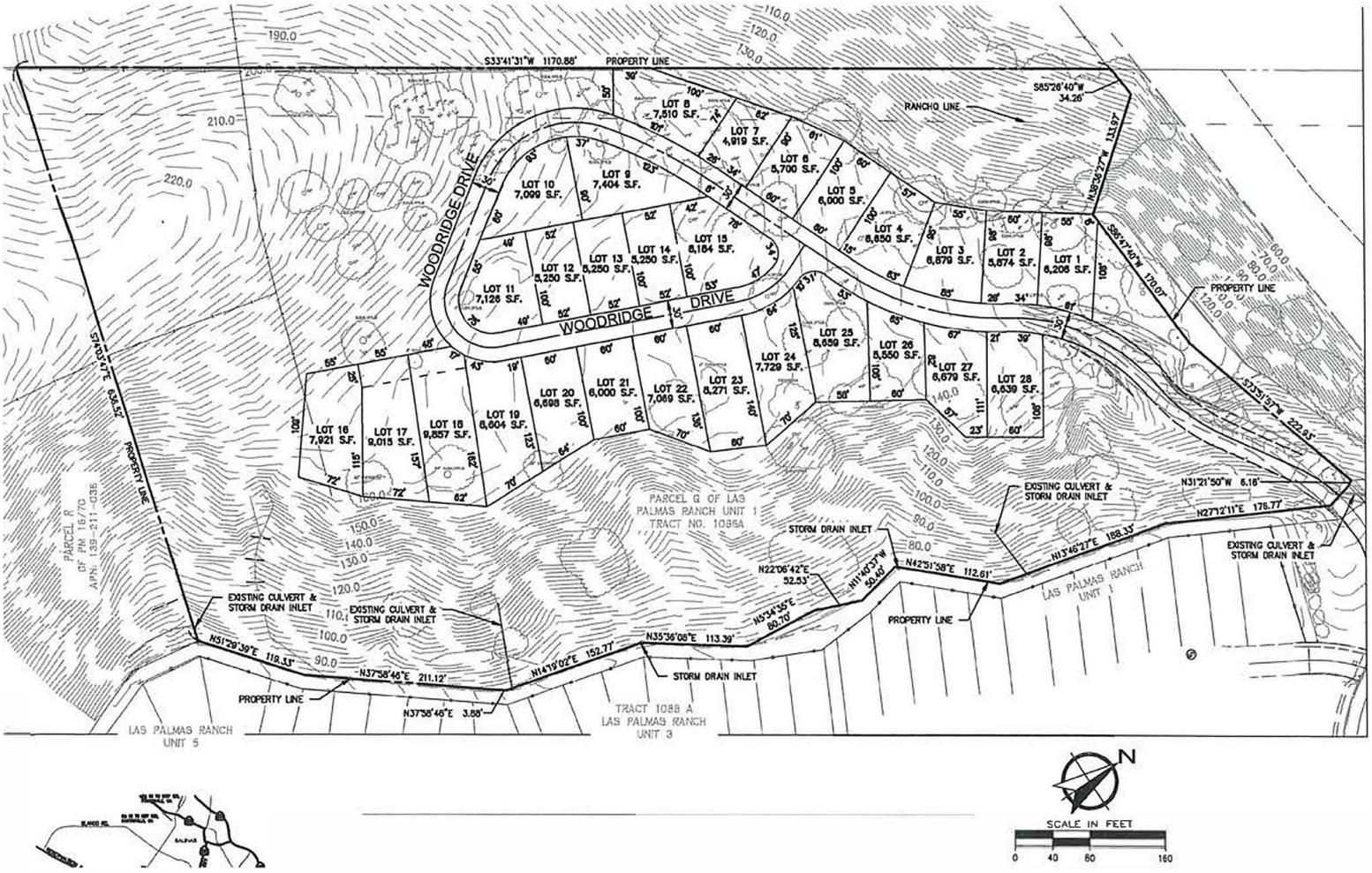


LEGEND

★ Project Location

Keith Higgins
Traffic Engineer

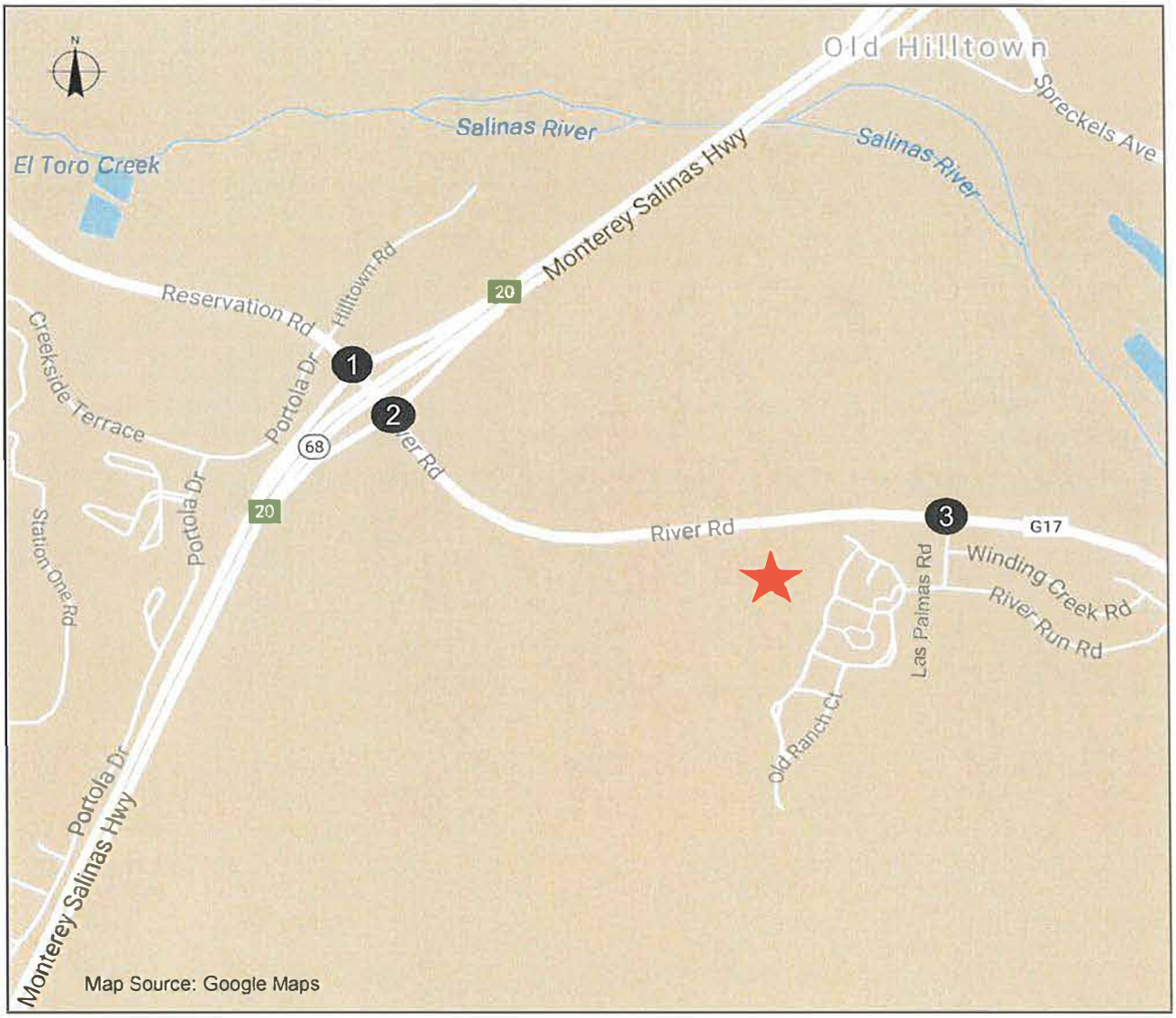
Exhibit 1
Project Location Map



Keith Higgins
Traffic Engineer

Exhibit 2
Project Site Plan

1784



LEGEND

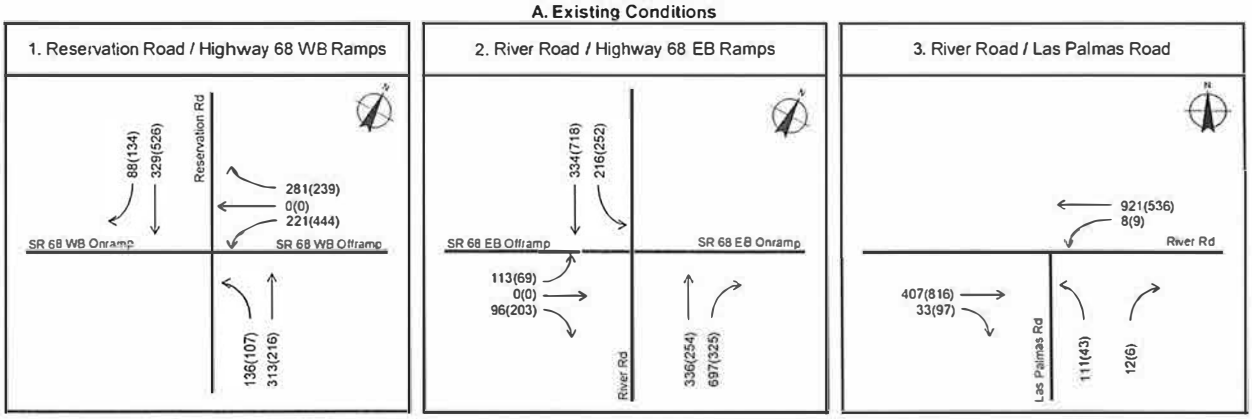
Project Site

X Study Intersection

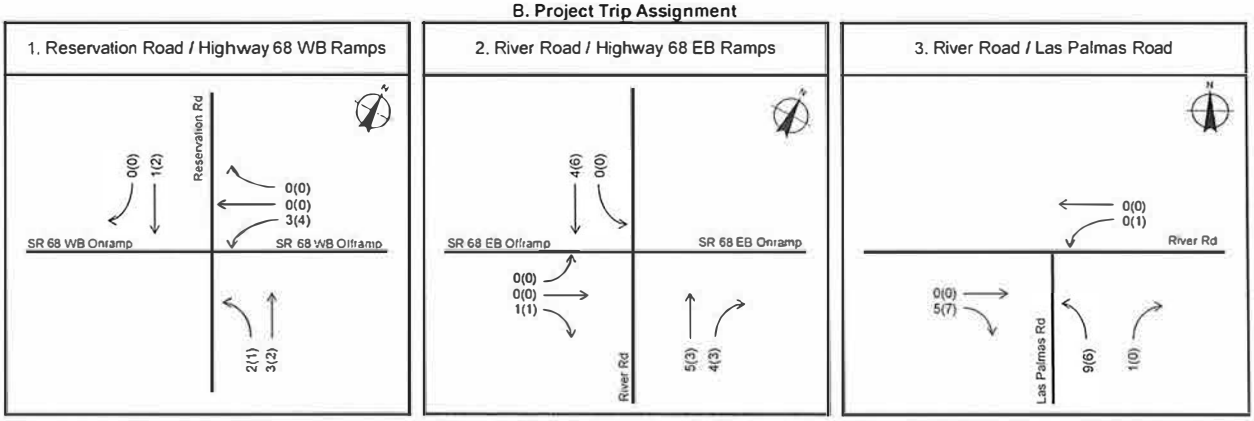
Keith Higgins
Traffic Engineer

Exhibit 3
Study Intersections

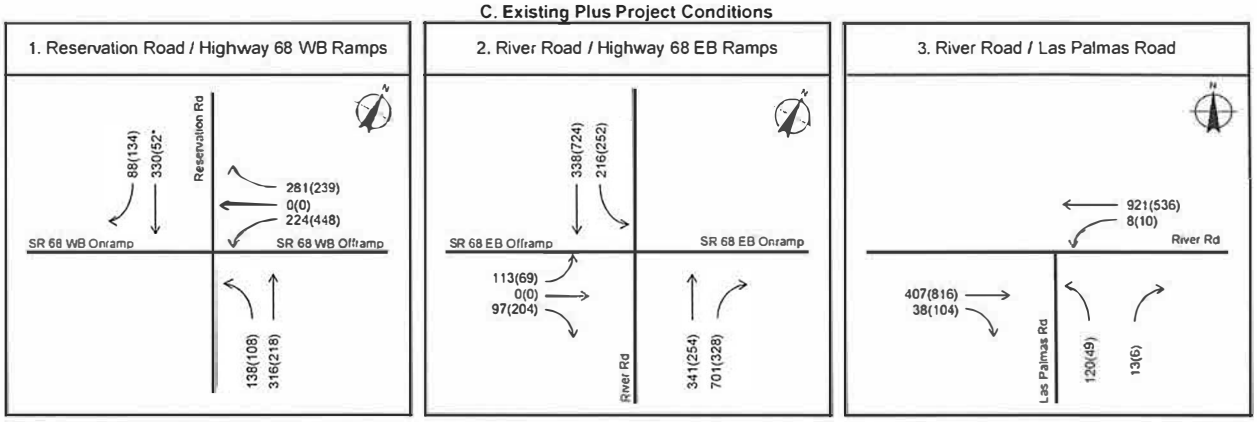
A. Existing Conditions



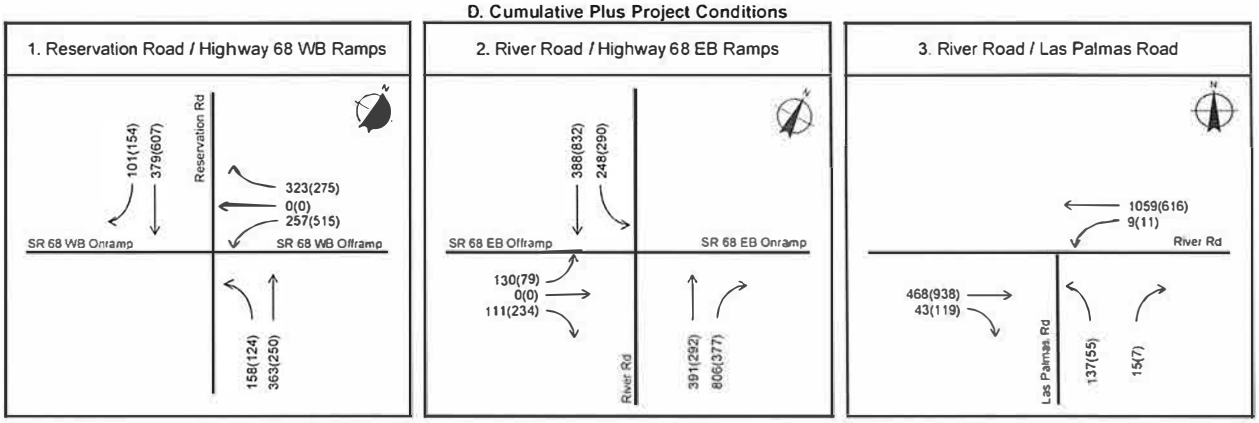
B. Project Trip Assignment



C. Existing Plus Project Conditions



D. Cumulative Plus Project Conditions

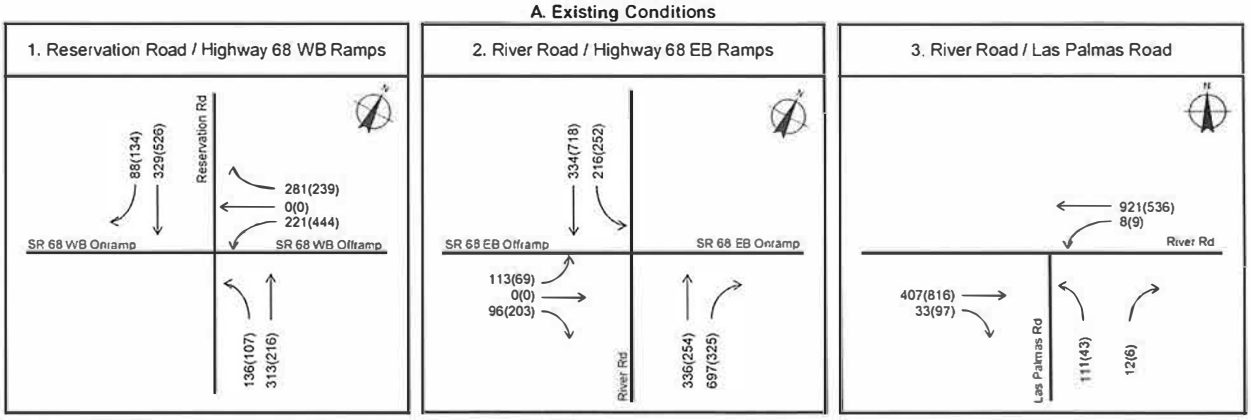


XX (YY) = AM (PM)

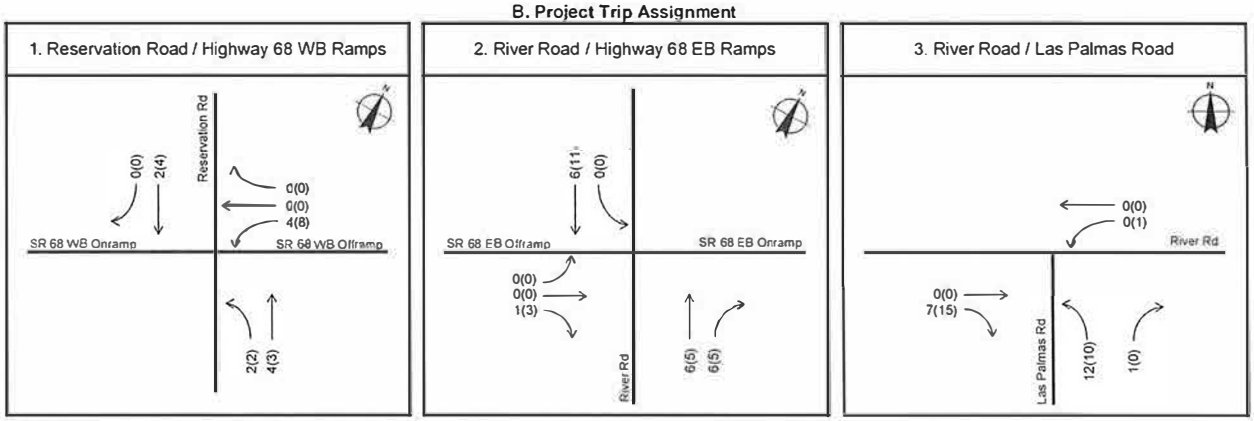
Keith Higgins
Traffic Engineer

Exhibit 4
AM & PM Peak Hour Volumes and Project Trip Assignment - Las Palmas 1 Trip Rates

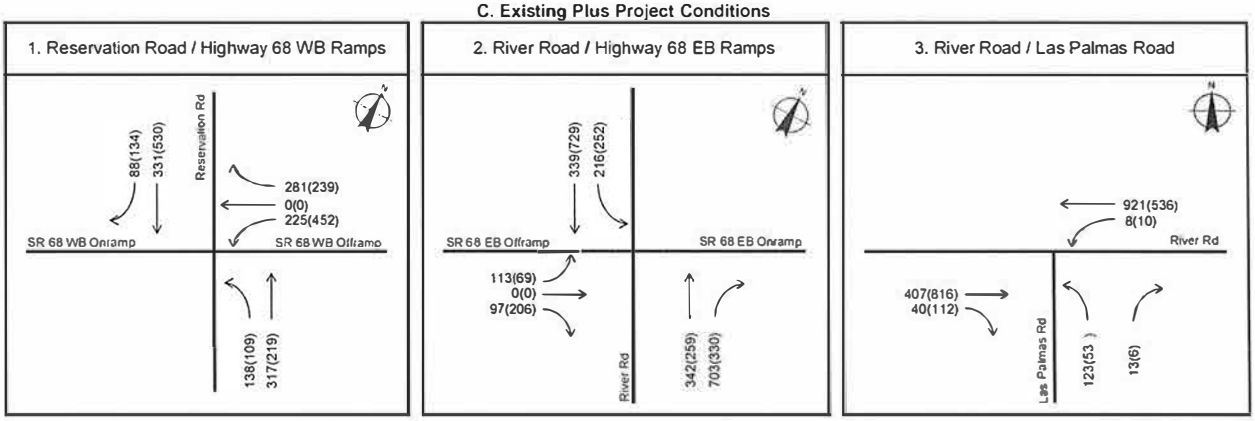
A. Existing Conditions



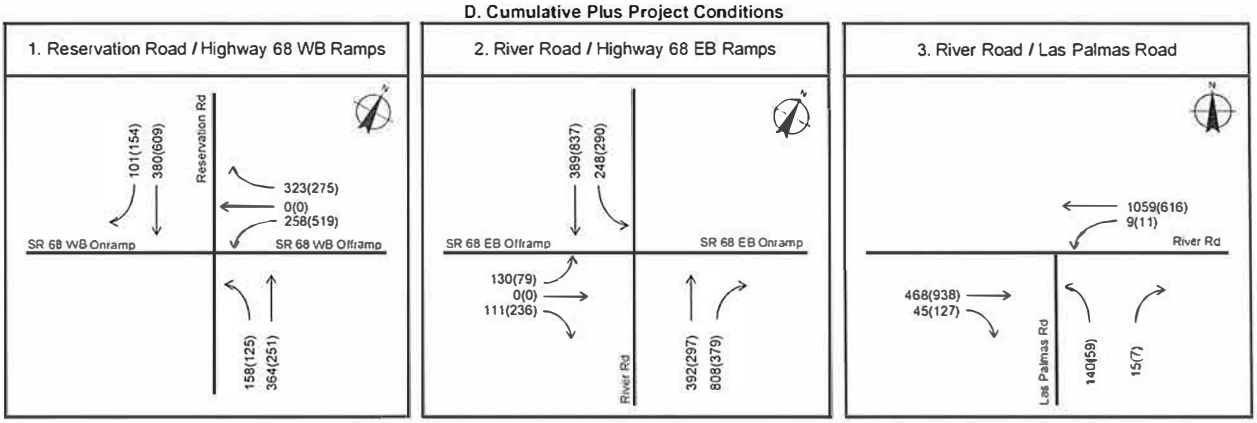
B. Project Trip Assignment



C. Existing Plus Project Conditions



D. Cumulative Plus Project Conditions



XX (YY) = AM (PM)

Keith Higgins
Traffic Engineer

Exhibit 5
AM & PM Peak Hour Volumes and Project Trip Assignment - Single Family Detached

Previous Senior Housing Project

	N-S Street	E-W Street	Existing Lane Configuration	Existing Intersection Control	LOS Standard	Existing Conditions AM Peak Hr. Delay (sec)	Existing Conditions AM Peak Hr. LOS	Existing Conditions PM Peak Hr. Delay (sec)	Existing Conditions PM Peak Hr. LOS	Existing + Project Conditions AM Peak Hr. Delay (sec)	Existing + Project Conditions AM Peak Hr. LOS	Existing + Project Conditions PM Peak Hr. Delay (sec)	Existing + Project Conditions PM Peak Hr. LOS	Cumulative + Project Conditions AM Peak Hr. Delay (sec)	Cumulative + Project Conditions AM Peak Hr. LOS	Cumulative + Project Conditions PM Peak Hr. Delay (sec)	Cumulative + Project Conditions PM Peak Hr. LOS
1	Reservation Road	Highway 68 WB Ramps	NB 1-L, 1-T SB 1-T/R WB 1-L/T, 1-R	Signal	Caltrans C	20.3	C	31.3	C	20.3	C	32.0	C	24.6	C	48.7	D
				Miti 1										20.8	C	31.1	C
				Miti 2										8.2	A	24.8	C
2	River Road	Highway 68 EB Ramps	NB 1-T, 1-R SB 1-L, 1-T EB 1-L/T, 1-R	Signal	Caltrans C	26.3	C	14.5	B	26.5	C	14.6	B	42.7	D	17.8	B
				Miti 1										27.0	C	14.8	B
				Miti 2										6.5	A	9.9	A
3	Las Palmas Road	River Road	NB 1-L, 1-R EB 2-T, 1-R WB 1-L, 2-T	Signal	County D	4.9	A	4.2	A	5.0	A	4.4	A	5.3	A	4.4	A

Notes:
1 L, T, R = Left, Through, Right
2 NB, SB, EB, WB = Northbound, Southbound, Eastbound, Westbound
3 Highlighted levels of service exceed jurisdiction's LOS standard.
4 Miti 1 = Add SBR at Intersection #1 and 2nd SBL at Intersection #2.
5 Miti 2 = Convert Intersections #1 and #2 to roundabouts.

Based on Single Family Trip Rates

	N-S Street	E-W Street	Existing Lane Configuration	Existing Intersection Control	LOS Standard	Existing Conditions AM Peak Hr. Delay (sec)	Existing Conditions AM Peak Hr. LOS	Existing Conditions PM Peak Hr. Delay (sec)	Existing Conditions PM Peak Hr. LOS	Existing + Project Conditions AM Peak Hr. Delay (sec)	Existing + Project Conditions AM Peak Hr. LOS	Existing + Project Conditions PM Peak Hr. Delay (sec)	Existing + Project Conditions PM Peak Hr. LOS	Cumulative + Project Conditions AM Peak Hr. Delay (sec)	Cumulative + Project Conditions AM Peak Hr. LOS	Cumulative + Project Conditions PM Peak Hr. Delay (sec)	Cumulative + Project Conditions PM Peak Hr. LOS
1	Reservation Road	Highway 68 WB Ramps	NB 1-L, 1-T SB 1-T/R WB 1-L/T, 1-R	Signal	Caltrans C	20.3	C	31.3	C	20.4	C	32.1	C	24.7	C	48.7	D
				Miti 1										20.9	C	31.2	C
				Miti 2										8.3	A	24.8	C
2	River Road	Highway 68 EB Ramps	NB 1-T, 1-R SB 1-L, 1-T EB 1-L/T, 1-R	Signal	Caltrans C	26.3	C	14.5	B	26.6	C	14.6	B	42.9	D	17.8	B
				Miti 1										27.1	C	14.8	B
				Miti 2										6.6	A	4.8	A
3	Las Palmas Road	River Road	NB 1-L, 1-R EB 2-T, 1-R WB 1-L, 2-T	Signal	County D	4.9	A	4.2	A	5.3	A	4.7	A	5.5	A	4.8	A

Notes:
1 L, T, R = Left, Through, Right
2 NB, SB, EB, WB = Northbound, Southbound, Eastbound, Westbound
3 Highlighted levels of service exceed jurisdiction's LOS standard.
4 Miti 1 = Add SBR at Intersection #1 and 2nd SBL at Intersection #2.
5 Miti 2 = Convert Intersections #1 and #2 to roundabouts.

Keith Higgins
Traffic Engineer

Exhibit 6
Intersection Levels of Service

PREVIOUS SENIOR HOUSING PROJECT

TRIP GENERATION RATES[1]	ITE Land Use Code	Daily Trip Rate	AM Peak Hour Peak Hour Rate	AM Peak Hour % of ADT	AM Peak Hour % In	AM Peak Hour % Out	PM Peak Hour Peak Hour Rate	PM Peak Hour % of ADT	PM Peak Hour % In	PM Peak Hour % Out
Senior Housing - Detached (per unit)	251	3.68	0.22	6%	35%	65%	0.27	7%	61%	39%
Senior Housing - Attached (per unit)	252	3.44	0.2	6%	34%	66%	0.25	7%	54%	46%
Assisted Living (per bed)	254	2.74	0.18	7%	68%	32%	0.29	11%	50%	50%
Nursing Home (per bed)	620	2.74	0.17	6%	69%	31%	0.22	8%	33%	67%

GENERATED TRIPS	Project Size	Daily Trips	AM Peak Hour Peak Hour Trips	AM Peak Hour % of ADT	AM Peak Hour Trips Inbound	AM Peak Hour Trips Outbound	PM Peak Hour Peak Hour Trips	PM Peak Hour % of ADT	PM Peak Hour Trips Inbound	PM Peak Hour Trips Outbound
SENIOR HOUSING PROJECT										
Senior Housing - Detached	0 Units	0	0	-	0	0	0	-	0	0
Senior Housing - Attached (Casitas)	26 Units	89	5	6%	2	3	7	8%	4	3
Assisted Care	52 Beds	142	9	6%	6	3	15	11%	8	7
Memory Care (Nursing Home)	48 Beds	132	8	6%	6	2	11	8%	4	7
Total Using Standard ITE Rates		**363**	**22**	**6%**	**14**	**8**	**33**	**9%**	**16**	**17**
Reduction in Peak Hour Traffic by Adjusting Day Shift A Schedule			**12**		**12**	**0**	**12**		**0**	**12**
Total with Adjusted Work Schedules			**10**		**2**	**8**	**21**		**16**	**5**

PROJECT TRAFFIC ASSIGNMENT TO HIGHWAY 68 SEGMENTS	Percent of Total	Total	EB	WB	Total	EB	WB
River Road to Toro Park (4 Lane Section)	17%	1.7	0.3	1.4	3.6	2.7	0.9
Toro Park to Laureles Grade (2 Lane Section)	14%	1.4	0.3	1.1	2.9	2.2	0.7
Laureles Grade to Highway 218 (2 Lane Section)	8%	0.8	0.2	0.6	1.7	1.3	0.4
West of Highway 218 (2 Lane Section)	5%	0.5	0.1	0.4	1.1	0.8	0.3
Highway 218	2%	0.2	0.0	0.2	0.4	0.3	0.1

Note: Trip generation rates published by Institute of Transportation Engineers, "Trip Generation Manual," 9th Edition, 2012.

CURRENT RESIDENTIAL SUBDIVISION PROJECT

TRIP GENERATION RATES[1]	ITE Land Use Code	Daily Trip Rate	AM Peak Hour Peak Hour Rate	AM Peak Hour % of ADT	AM Peak Hour % In	AM Peak Hour % Out	PM Peak Hour Peak Hour Rate	PM Peak Hour % of ADT	PM Peak Hour % In	PM Peak Hour % Out
Based on Las Palmas 1 Traffic Counts	N.A.	7.10	0.52	7%	31%	69%	0.50	7%	57%	43%
1983 Las Palmas Ranch Specific Plan	N.A.	8.00	0.56	7%	31%	69%	0.80	10%	57%	43%
Single-Family Attached Housing	215	7.20	0.48	7%	31%	69%	0.57	8%	57%	43%
Single-Family Detached Housing	210	9.43	0.70	7%	26%	74%	0.94	10%	63%	37%

GENERATED TRIPS	Project Size	Daily Trips	AM Peak Hour Peak Hour Trips	AM Peak Hour % of ADT	AM Peak Hour Trips Inbound	AM Peak Hour Trips Outbound	PM Peak Hour Peak Hour Trips	PM Peak Hour % of ADT	PM Peak Hour Trips Inbound	PM Peak Hour Trips Outbound
PROPOSED PROJECT - RESIDENTIAL SUBDIVISION WITH VARIOUS TRIP GENERATION ASSUMPTIONS										
Based on Las Palmas 1 Traffic Counts	28 Homes	199	15	8%	5	10	14	7%	8	6
1983 Las Palmas Ranch Specific Plan	28 Homes	224	16	7%	6	10	22	10%	13	9
Single-Family Attached Housing	28 Homes	202	13	6%	5	8	16	8%	9	7
Single-Family Detached Housing	28 Homes	264	20	8%	7	13	26	10%	16	10
CHANGE FROM PREVIOUS SENIOR HOUSING PROJECT										
Based on Las Palmas 1 Traffic Counts		**-164**	**5**		**3**	**2**	**-7**		**-8**	**1**
1983 Las Palmas Ranch Specific Plan		**-139**	**6**		**4**	**2**	**1**		**-3**	**4**
Single-Family Attached Housing		**-161**	**3**		**3**	**0**	**-5**		**-7**	**2**
Single-Family Detached Housing		**-99**	**10**		**5**	**5**	**5**		**0**	**5**

LAS PALMAS RANCH SPEC. PLAN TRAFFIC ASSIGNMENT TO HWY 68	Percent of Total	Total	EB	WB	Total	EB	WB
River Road to Toro Park (4 Lane Section)	17%	2.7	1.0	1.7	3.7	2.2	1.5
Toro Park to Laureles Grade (2 Lane Section)	14%	2.2	0.8	1.4	3.1	1.8	1.3
Laureles Grade to Highway 218 (2 Lane Section)	8%	1.3	0.5	0.8	1.8	1.0	0.7
West of Highway 218 (2 Lane Section)	5%	0.8	0.3	0.5	1.1	0.7	0.5
Highway 218	2%	0.3	0.1	0.2	0.4	0.3	0.2

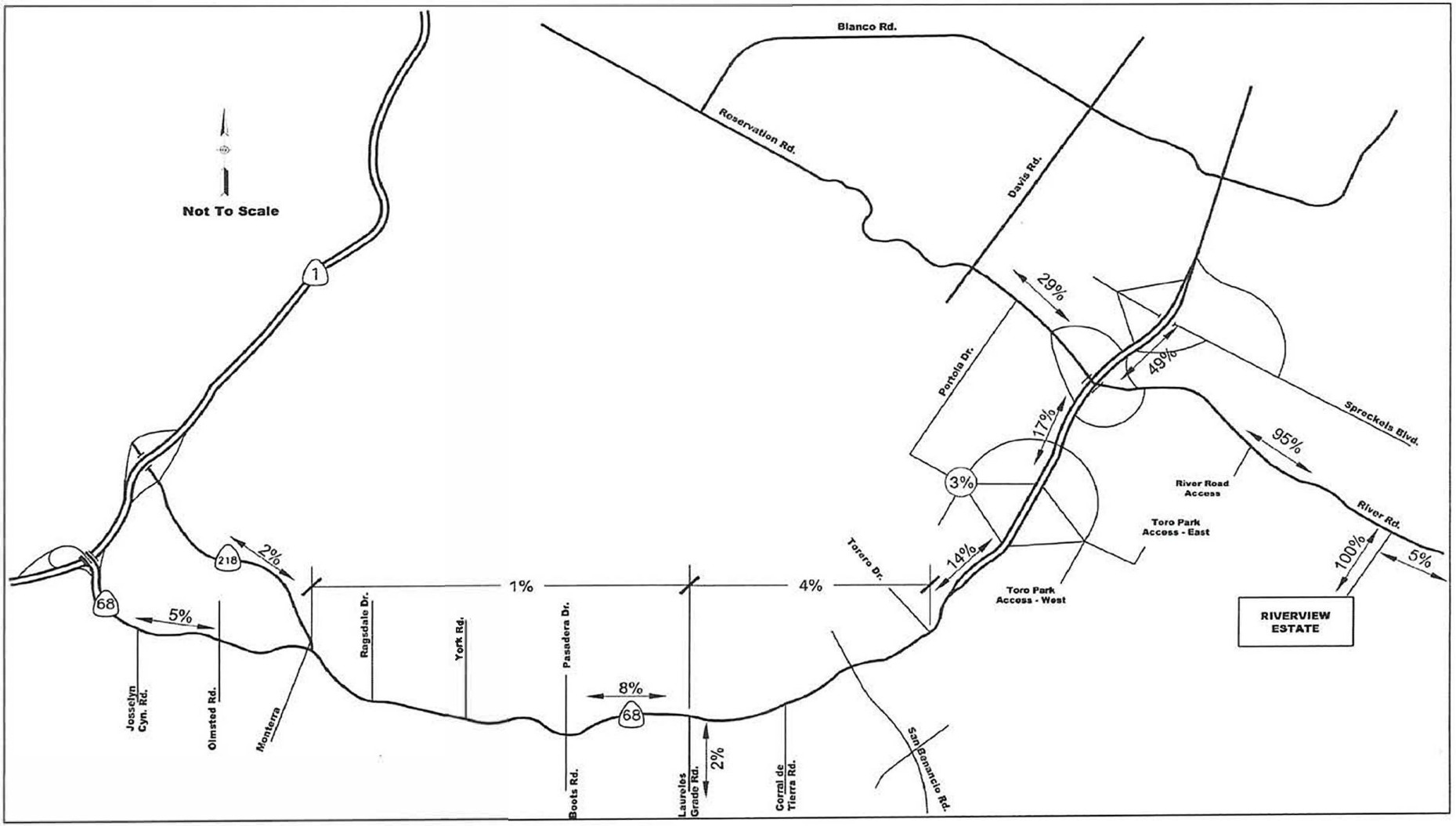
SINGLE FAMILY DETACHED TRAFFIC ASSIGNMENT TO HIGHWAY 68	Percent of Total	Total	EB	WB	Total	EB	WB
River Road to Toro Park (4 Lane Section)	17%	3.4	1.2	2.2	4.4	2.7	1.7
Toro Park to Laureles Grade (2 Lane Section)	14%	2.8	1.0	1.8	3.6	2.2	1.4
Laureles Grade to Highway 218 (2 Lane Section)	8%	1.6	0.6	1.0	2.1	1.3	0.8
West of Highway 218 (2 Lane Section)	5%	1.0	0.4	0.7	1.3	0.8	0.5
Highway 218	2%	0.4	0.1	0.3	0.5	0.3	0.2

SINGLE FAMILY ATTACHED TRAFFIC ASSIGNMENT TO HIGHWAY 68	Percent of Total	Total	EB	WB	Total	EB	WB
River Road to Toro Park (4 Lane Section)	17%	2.2	0.9	1.4	2.7	1.5	1.2
Toro Park to Laureles Grade (2 Lane Section)	14%	1.8	0.7	1.1	2.2	1.3	1.0
Laureles Grade to Highway 218 (2 Lane Section)	8%	1.0	0.4	0.6	1.3	0.7	0.6
West of Highway 218 (2 Lane Section)	5%	0.7	0.3	0.4	0.8	0.5	0.4
Highway 218	2%	0.3	0.1	0.2	0.3	0.2	0.1

Note: Trip generation rates published by Institute of Transportation Engineers, "Trip Generation Manual," 11th Edition, 2021.

Keith Higgins
Traffic Engineer

Exhibit 7
Project Trip Generation



Keith Higgins
Traffic Engineer

Exhibit 8

Project Trip Distribution

1790

APPENDIX A

LEVEL OF SERVICE (LOS) DESCRIPTION
SIGNALIZED INTERSECTIONS

The capacity of an urban street is related primarily to the signal timing and the geometric characteristics of the facility as well as to the composition of traffic on the facility. Geometrics are a fixed characteristic of a facility. Thus, while traffic composition may vary somewhat over time, the capacity of a facility is generally a stable value that can be significantly improved only by initiating geometric improvements. A traffic signal essentially allocates time among conflicting traffic movements that seek to use the same space. The way in which time is allocated significantly affects the operation and the capacity of the intersection and its approaches.

The methodology for signalized intersection is designed to consider individual intersection approaches and individual lane groups within approaches. A lane group consists of one or more lanes on an intersection approach. The outputs from application of the method described in the HCM 2010 are reported on the basis of each lane. For a given lane group at a signalized intersection, three indications are displayed: green, yellow and red. The red indication may include a short period during which all indications are red, referred to as an all-red interval and the yellow indication forms the change and clearance interval between two green phases.

The methodology for analyzing the capacity and level of service must consider a wide variety of prevailing conditions, including the amount and distribution of traffic movements, traffic composition, geometric characteristics, and details of intersection signalization. The methodology addresses the capacity, LOS, and other performance measures for lane groups and the intersection approaches and the LOS for the intersection as a whole.

Capacity is evaluated in terms of the ratio of demand flow rate to capacity (v/c ratio), whereas LOS is evaluated on the basis of control delay per vehicle (in seconds per vehicle). The methodology does not take into account the potential impact of downstream congestion on intersection operation, nor does the methodology detect and adjust for the impacts of turn-pocket overflows on through traffic and intersection operation.

LEVEL OF SERVICE (LOS) CRITERIA FOR SIGNALIZED INTERSECTIONS
(Reference Highway Capacity Manual 2010)

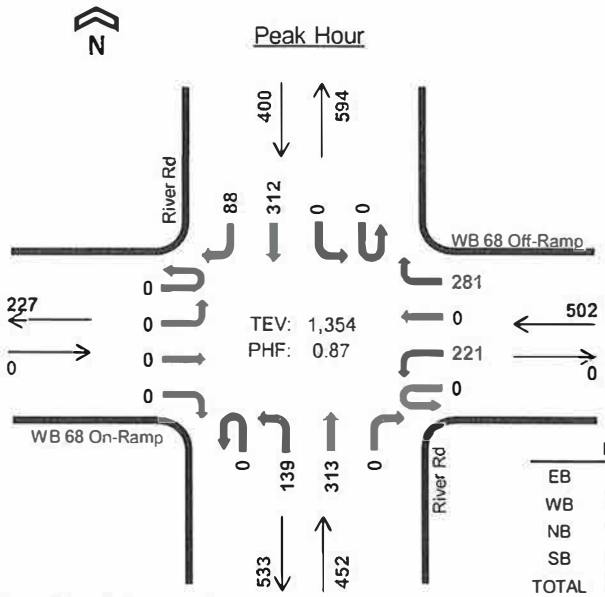
Level of Service	Control Delay (seconds / vehicle)
A	<10
B	>10 - 20
C	>20 - 35
D	>35 - 55
E	>55 - 80
F	>80

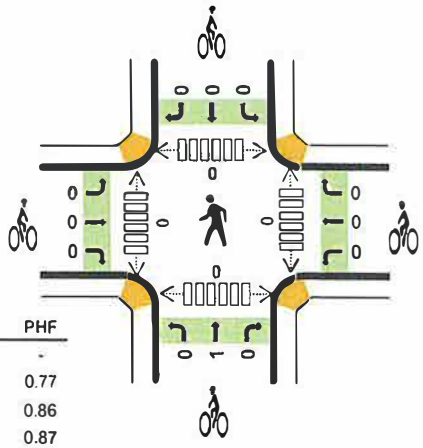
Appendix B

Traffic Count Data

River Rd
WB 68 On-Ramp

Date: 03/28/2017
Count Period: 7:00 AM to 9:00 AM
Peak Hour: 7:15 AM to 8:15 AM





	HV %:	PHF
EB	-	-
WB	3.8%	0.77
NB	1.3%	0.86
SB	2.3%	0.87
TOTAL	2.5%	0.87

Two-Hour Count Summaries

Interval Start	WB 68 On-Ramp Eastbound				WB 68 Off-Ramp Westbound				River Rd Northbound				River Rd Southbound				15-min Total	Rolling One Hour
	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT		
7:00 AM	0	0	0	0	0	61	0	67	0	50	55	0	0	0	51	24	308	0
7:15 AM	0	0	0	0	0	37	0	81	0	46	73	0	0	0	68	21	326	0
7:30 AM	0	0	0	0	0	34	0	60	0	22	68	0	0	0	77	25	286	0
7:45 AM	0	0	0	0	0	54	0	72	0	31	80	0	0	0	90	25	352	1,272
8:00 AM	0	0	0	0	0	96	0	68	0	40	92	0	0	0	77	17	390	1,354
8:15 AM	0	0	0	0	0	60	0	66	0	24	74	0	0	0	50	19	293	1,321
8:30 AM	0	0	0	0	0	40	0	56	0	31	57	0	0	0	48	26	258	1,293
8:45 AM	0	0	0	0	0	43	0	47	0	43	41	0	0	0	63	14	251	1,192
Count Total	0	0	0	0	0	425	0	517	0	287	540	0	0	0	524	171	2,464	0
Peak Hour All	0	0	0	0	0	221	0	281	0	139	313	0	0	0	312	88	1,354	0
Peak Hour HV	0	0	0	0	0	14	0	5	0	4	2	0	0	0	7	2	34	0
Peak Hour HV%	-	-	-	-	-	6%	-	2%	-	3%	1%	-	-	-	2%	2%	3%	0

Note: Two-hour count summary volumes include heavy vehicles but exclude bicycles in overall count.

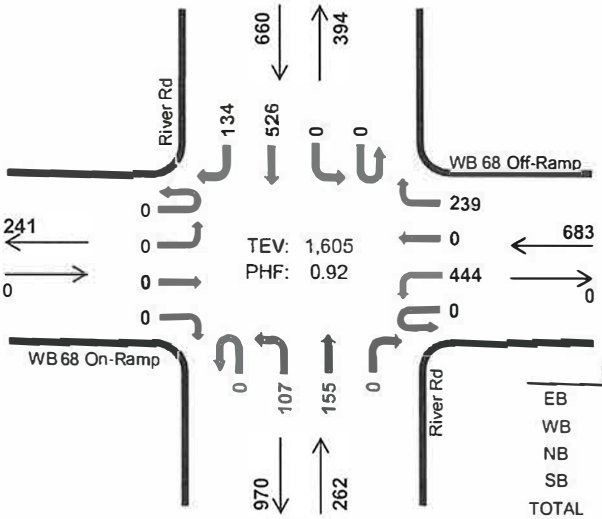
Interval Start	Heavy Vehicle Totals EB	WB	NB	SB	Total	Bicycles EB	WB	NB	SB	Total	Pedestrians (Crossing Leg) East	West	North	South	Total
7:00 AM	0	3	1	3	7	0	0	0	0	0	0	0	0	0	0
7:15 AM	0	5	0	0	5	0	0	0	0	0	0	0	0	0	0
7:30 AM	0	4	2	3	9	0	0	1	0	1	0	0	0	0	0
7:45 AM	0	5	0	3	8	0	0	0	0	0	0	0	0	0	0
8:00 AM	0	5	4	3	12	0	0	0	0	0	0	0	0	0	0
8:15 AM	0	8	0	2	10	0	0	0	1	1	0	0	0	0	0
8:30 AM	0	4	2	1	7	0	0	0	0	0	0	0	0	0	0
8:45 AM	0	5	1	4	10	0	0	0	0	0	0	0	0	0	0
Count Total	0	39	10	19	68	0	0	1	1	2	0	0	0	0	0
Peak Hour	0	19	6	9	34	0	0	1	0	1	0	0	0	0	0

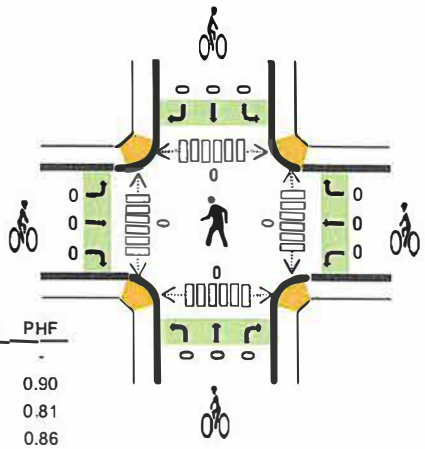
Deon Fouche: 415 - 757 - 7714
deon.fouche@idaxdata.com

River Rd
WB 68 On-Ramp

Date: 03/28/2017
Count Period: 4:00 PM to 6:00 PM
Peak Hour: 4:45 PM to 5:45 PM

Peak Hour





	HV %:	PHF
EB	-	-
WB	0.3%	0.90
NB	3.8%	0.81
SB	1.1%	0.86
TOTAL	1.2%	0.92

Two-Hour Count Summaries

Interval Start		WB 68 On-Ramp Eastbound				WB 68 Off-Ramp Westbound				River Rd Northbound				River Rd Southbound				15-min Total	Rolling One Hour
		UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT		
4:00 PM		0	0	0	0	0	70	0	38	0	39	26	0	0	0	94	27	294	0
4:15 PM		0	0	0	0	0	76	0	53	0	29	47	0	0	0	125	37	367	0
4:30 PM		0	0	0	0	0	78	0	50	0	36	58	0	0	0	97	39	358	0
4:45 PM		**0**	**0**	**0**	**0**	**0**	**93**	**0**	**48**	**0**	**39**	**42**	**0**	**0**	**0**	**114**	**37**	**373**	1,392
5:00 PM		**0**	**0**	**0**	**0**	**0**	**108**	**0**	**64**	**0**	**19**	**36**	**0**	**0**	**0**	**125**	**25**	**377**	1,475
5:15 PM		**0**	**0**	**0**	**0**	**0**	**130**	**0**	**60**	**0**	**16**	**40**	**0**	**0**	**0**	**153**	**38**	**437**	1, 545
5:30 PM		**0**	**0**	**0**	**0**	**0**	**113**	**0**	**67**	**0**	**33**	**37**	**0**	**0**	**0**	**134**	**34**	**418**	1,605
5:45 PM		0	0	0	0	0	99	0	51	0	22	30	0	0	0	127	26	355	1,587
Count Total		0	0	0	0	0	767	0	431	0	233	316	0	0	0	969	263	2,979	0
Peak Hour	All	**0**	**0**	**0**	**0**	**0**	**444**	**0**	**239**	**0**	**107**	**155**	**0**	**0**	**0**	**526**	**134**	**1,605**	**0**
	HV	**0**	**0**	**0**	**0**	**0**	**2**	**0**	**0**	**0**	**2**	**8**	**0**	**0**	**0**	**6**	**1**	**19**	**0**
	HV%	-	-	-	-	-	**0%**	-	**0%**	-	**2%**	**5%**	-	-	-	**1%**	**1%**	**1%**	**0**

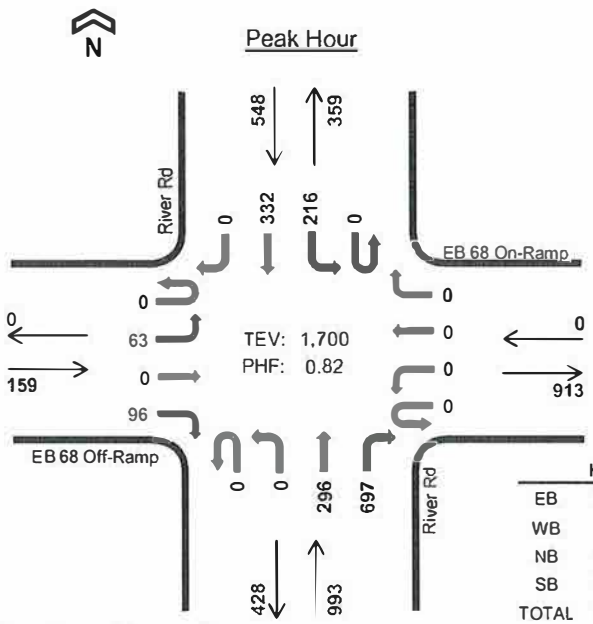
Note: Two-hour count summary volumes include heavy vehicles but exclude bicycles in overall count.

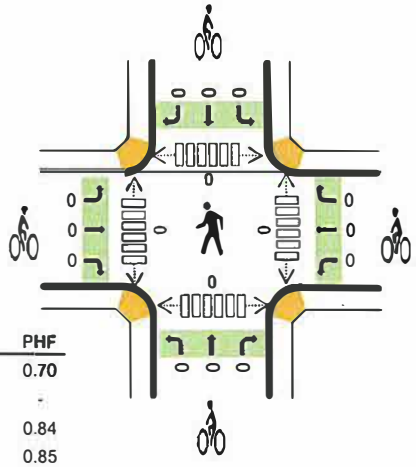
Interval Start	Heavy Vehicle Totals EB	WB	NB	SB	Total	Bicycles EB	WB	NB	SB	Total	Pedestrians (Crossing Leg) East	West	North	South	Total
4:00 PM	0	1	3	6	*10*	0	0	0	1	*1*	0	2	0	0	*2*
4:15 PM	0	1	1	3	*5*	0	0	1	0	*1*	0	0	0	0	*0*
4:30 PM	0	1	1	2	*4*	0	0	0	0	*0*	0	0	0	0	*0*
4:45 PM	**0**	**0**	7	2	*9*	**0**	**0**	**0**	**0**	*0*	**0**	**0**	**0**	**0**	*0*
5:00 PM	**0**	**0**	**0**	1	*1*	**0**	**0**	**0**	**0**	*0*	**0**	**0**	**0**	**0**	*0*
5:15 PM	**0**	1	**0**	1	*2*	**0**	**0**	**0**	**0**	*0*	**0**	**0**	**0**	**0**	*0*
5:30 PM	**0**	1	3	3	*7*	**0**	**0**	**0**	**0**	*0*	**0**	**0**	**0**	**0**	*0*
5:45 PM	0	0	0	2	*2*	0	0	0	0	*0*	0	0	0	0	*0*
Count Total	0	5	15	20	*40*	0	0	1	1	*2*	0	2	0	0	*2*
Peak Hour	**0**	**2**	**10**	**7**	*19*	**0**	**0**	**0**	**0**	*0*	**0**	**0**	**0**	**0**	*0*

Deon Fouche: 415 - 757 - 7714 deon.fouche@idaxdata.com

River Rd
EB 68 Off-Ramp

Date: 03/23/2017
Count Period: 7:00 AM to 9:00 AM
Peak Hour: 7:30 AM to 8:30 AM





	HV %:	PHF
EB	2.5%	0.70
WB	-	-
NB	1.2%	0.84
SB	3.1%	0.85
TOTAL	1.9%	0.82

Two-Hour Count Summaries

Interval Start	EB 68 Off-Ramp Eastbound				EB 68 On-Ramp Westbound				River Rd Northbound				River Rd Southbound				15-min Total	Rolling One Hour
	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT		
7:00 AM	0	19	0	24	0	0	0	0	0	0	103	65	0	28	64	0	303	0
7:15 AM	0	13	0	25	0	0	0	0	0	0	74	84	0	44	63	0	303	0
7:30 AM	**0**	**12**	**0**	**20**	**0**	**0**	**0**	**0**	**0**	**0**	**49**	**158**	**0**	**70**	**60**	**0**	**369**	0
7:45 AM	**0**	**12**	**0**	**18**	**0**	**0**	**0**	**0**	**0**	**0**	**60**	**176**	**0**	**65**	**75**	**0**	**406**	1,381
8:00 AM	**0**	**23**	**0**	**34**	**0**	**0**	**0**	**0**	**0**	**0**	**106**	**191**	**0**	**46**	**116**	**0**	**516**	1,594
8:15 AM	**0**	**16**	**0**	**24**	**0**	**0**	**0**	**0**	**0**	**0**	**81**	**172**	**0**	**35**	**81**	**0**	**409**	**1,700**
8:30 AM	0	16	0	16	0	0	0	0	0	0	73	75	0	35	61	0	276	1,607
8:45 AM	0	22	0	23	0	0	0	0	0	0	61	63	0	24	53	0	246	1,447
Count Total	0	133	0	184	0	0	0	0	0	0	607	984	0	347	573	0	2,828	0
Peak Hour All	**0**	**63**	**0**	**96**	**0**	**0**	**0**	**0**	**0**	**0**	**296**	**697**	**0**	**216**	**332**	**0**	**1,700**	**0**
Peak Hour HV	**0**	**1**	**0**	**3**	**0**	**0**	**0**	**0**	**0**	**0**	**5**	**7**	**0**	**7**	**10**	**0**	**33**	**0**
Peak Hour HV%	**-**	**2%**	**-**	**3%**	**-**	**-**	**-**	**-**	**-**	**-**	**2%**	**1%**	**-**	**3%**	**3%**	**-**	**2%**	**0**

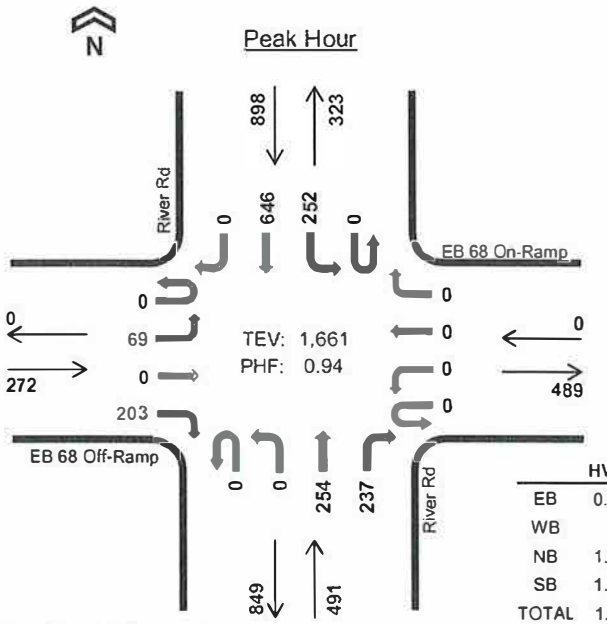
Note: Two-hour count summary volumes include heavy vehicles but exclude bicycles in overall count.

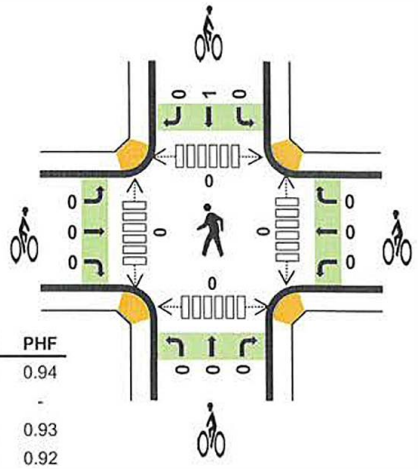
Interval Start	Heavy Vehicle Totals					Bicycles					Pedestrians (Crossing Leg)				
	EB	WB	NB	SB	Total	EB	WB	NB	SB	Total	East	West	North	South	Total
7:00 AM	1	0	1	6	*8*	0	0	0	0	*0*	0	0	0	0	*0*
7:15 AM	0	0	1	4	*5*	0	0	0	0	*0*	0	0	0	0	*0*
7:30 AM	**2**	**0**	**1**	**4**	***7***	**0**	**0**	**0**	**0**	***0***	**0**	**0**	**0**	**0**	*0*
7:45 AM	**0**	**0**	**1**	**8**	***9***	**0**	**0**	**0**	**0**	***0***	**0**	**0**	**0**	**0**	*0*
8:00 AM	**2**	**0**	**3**	**2**	***7***	**0**	**0**	**0**	**0**	***0***	**0**	**0**	**0**	**0**	*0*
8:15 AM	**0**	**0**	**7**	**3**	***10***	**0**	**0**	**0**	**0**	***0***	**0**	**0**	**0**	**0**	***0***
8:30 AM	0	0	1	7	*8*	0	0	0	0	*0*	0	0	0	0	*0*
8:45 AM	2	0	1	3	*6*	0	0	0	0	*0*	0	0	0	0	*0*
Count Total	7	0	16	37	*60*	0	0	0	0	*0*	0	0	0	0	*0*
Peak Hour	**4**	**0**	**12**	**17**	***33***	**0**	**0**	**0**	**0**	***0***	**0**	**0**	**0**	**0**	***0***

Deon Fouche: 415 - 757 - 7714 deon.fouche@idaxdata.com

River Rd
EB 68 Off-Ramp

Date: 03/23/2017
Count Period: 4:00 PM to 6:00 PM
Peak Hour: 4:30 PM to 5:30 PM





	HV %:	PHF
EB	0.4%	0.94
WB	-	-
NB	1.2%	0.93
SB	1.2%	0.92
TOTAL	1.1%	0.94

Two-Hour Count Summaries

Interval Start	EB 68 Off-Ramp Eastbound				EB 68 On-Ramp Westbound				River Rd Northbound				River Rd Southbound				15-min Total	Rolling One Hour
	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT		
4:00 PM	0	20	0	58	0	0	0	0	0	0	50	66	0	53	125	0	372	0
4:15 PM	0	19	0	38	0	0	0	0	0	0	54	66	0	54	138	0	369	0
4:30 PM	0	20	0	45	0	0	0	0	0	0	76	53	0	58	164	0	416	0
4:45 PM	0	20	0	47	0	0	0	0	0	0	59	73	0	59	137	0	395	1,552
5:00 PM	0	18	0	54	0	0	0	0	0	0	61	66	0	66	177	0	442	1,622
5:15 PM	0	11	0	57	0	0	0	0	0	0	58	45	0	69	168	0	408	1,661
5:30 PM	0	14	0	51	0	0	0	0	0	0	53	77	0	58	157	0	410	1,655
5:45 PM	0	14	0	58	0	0	0	0	0	0	33	65	0	48	144	0	362	1,622
Count Total	0	136	0	408	0	0	0	0	0	0	444	511	0	465	1,210	0	3,174	0
Peak Hour All	0	69	0	203	0	0	0	0	0	0	254	237	0	252	646	0	1,661	0
Peak Hour HV	0	0	0	1	0	0	0	0	0	0	3	3	0	5	6	0	18	0
Peak Hour HV%	-	0%	-	0%	-	-	-	-	-	-	1%	1%	-	2%	1%	-	1%	0

Note: Two-hour count summary volumes include heavy vehicles but exclude bicycles in overall count.

Interval Start	Heavy Vehicle Totals					Bicycles					Pedestrians (Crossing Leg)				
	EB	WB	NB	SB	Total	EB	WB	NB	SB	Total	East	West	North	South	Total
4:00 PM	1	0	0	3	*4*	0	0	0	0	*0*	0	0	0	0	*0*
4:15 PM	1	0	1	4	*6*	0	0	0	0	*0*	0	0	0	0	*0*
4:30 PM	0	0	0	3	***3***	0	0	0	0	***0***	0	0	0	0	*0*
4:45 PM	1	0	5	1	***7***	0	0	0	0	***0***	0	0	0	0	*0*
5:00 PM	0	0	1	3	***4***	0	0	0	1	*1*	0	0	0	0	*0*
5:15 PM	0	0	0	4	***4***	0	0	0	0	***0***	0	0	0	0	***0***
5:30 PM	0	0	0	5	5	0	0	0	0	*0*	0	0	0	0	*0*
5:45 PM	2	0	0	1	*3*	0	0	0	0	*0*	0	0	0	0	*0*
Count Total	5	0	7	24	*36*	0	0	0	1	*1*	0	0	0	0	*0*
Peak Hour	1	0	6	11	***18***	0	0	0	1	***1***	0	0	0	0	***0***

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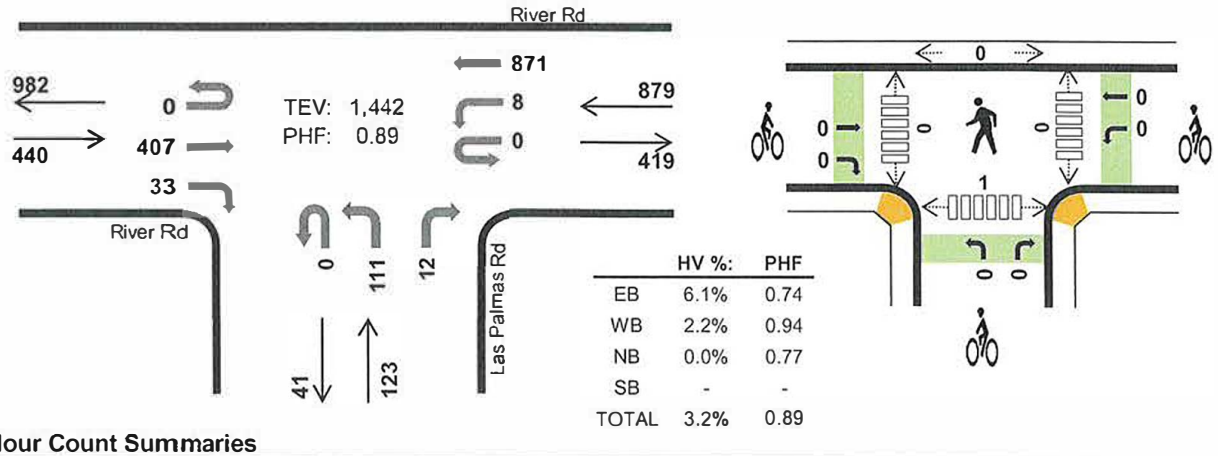
Las Palmas Rd
River Rd

N

Peak Hour

Date: 05/18/2017
Count Period: 7:00 AM to 9:00 AM
Peak Hour: 7:30 AM to 8:30 AM



	HV %:	PHF
EB	6.1%	0.74
WB	2.2%	0.94
NB	0.0%	0.77
SB	-	-
TOTAL	3.2%	0.89

Two-Hour Count Summaries

Interval Start		River Rd Eastbound				River Rd Westbound				Las Palmas Rd Northbound				0 Southbound				15-min Total	Rolling One Hour
		UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT		
7:00 AM		0	0	68	1	0	0	172	0	0	25	0	2	0	0	0	0	268	0
7:15 AM		0	0	68	6	0	0	151	0	0	38	0	1	0	0	0	0	264	0
7:30 AM		0	0	86	4	0	3	228	0	0	31	0	3	0	0	0	0	355	0
7:45 AM		0	0	101	11	0	1	197	0	0	35	0	5	0	0	0	0	350	1,237
8:00 AM		0	0	141	8	0	3	232	0	0	19	0	4	0	0	0	0	407	1,376
8:15 AM		0	0	79	10	0	1	214	0	0	26	0	0	0	0	0	0	330	1,442
8:30 AM		0	0	87	7	0	1	118	0	0	18	0	0	0	0	0	0	231	1,318
8:45 AM		0	0	66	6	0	1	118	0	0	21	0	0	0	0	0	0	212	1,180
Count Total		0	0	696	53	0	10	1,430	0	0	213	0	15	0	0	0	0	2,417	0
Peak Hour	All	0	0	407	33	0	8	871	0	0	111	0	12	0	0	0	0	1,442	0
	HV	0	0	25	2	0	0	19	0	0	0	0	0	0	0	0	0	46	0
	HV%	-	-	6%	6%	-	0%	2%	-	-	0%	-	0%	-	-	-	-	3%	0

Note: Two-hour count summary volumes include heavy vehicles but exclude bicycles in overall count.

Interval Start	Heavy Vehicle Totals					Bicycles					Pedestrians (Crossing Leg)				
	EB	WB	NB	SB	Total	EB	WB	NB	SB	Total	East	West	North	South	Total
7:00 AM	1	0	0	0	*1*	0	0	0	0	*0*	0	0	0	0	*0*
7:15 AM	2	3	0	0	*5*	0	0	0	0	*0*	0	0	0	0	*0*
7:30 AM	10	2	0	0	*12*	0	0	0	0	*0*	0	0	0	0	*0*
7:45 AM	4	6	0	0	*10*	0	0	0	0	*0*	0	0	0	0	*0*
8:00 AM	9	4	0	0	*13*	0	0	0	0	*0*	0	0	0	1	*1*
8:15 AM	4	7	0	0	*11*	0	0	0	0	*0*	0	0	0	0	*0*
8:30 AM	4	2	0	0	*6*	0	0	0	0	*0*	0	0	0	0	*0*
8:45 AM	3	3	1	0	*7*	0	0	0	0	*0*	0	0	0	0	*0*
Count Total	37	27	1	0	*65*	0	0	0	0	*0*	0	0	0	1	*1*
Peak Hr	27	19	0	0	*46*	0	0	0	0	*0*	0	0	0	1	*1*

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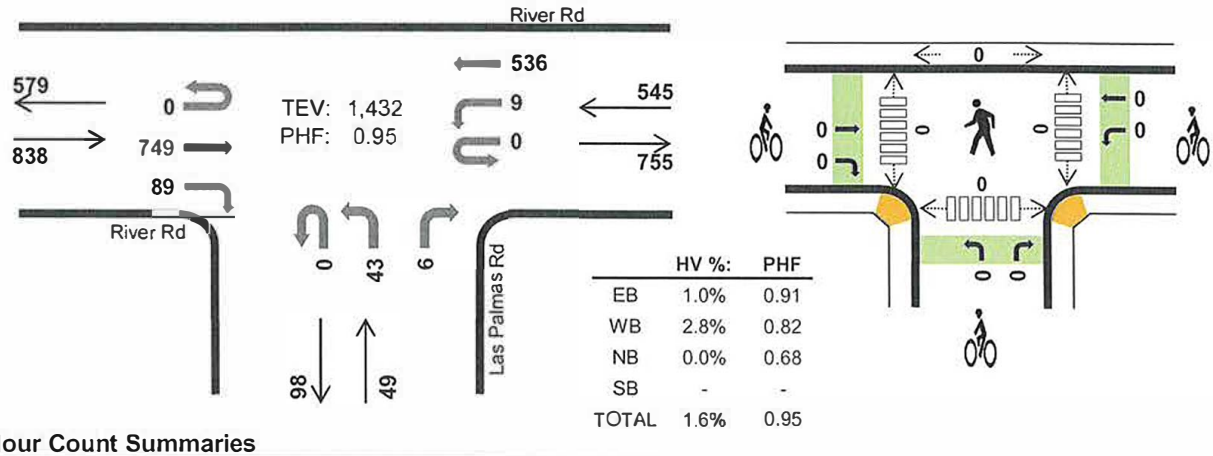
Las Palmas Rd
River Rd

N

Peak Hour

Date: 05/18/2017
Count Period: 4:00 PM to 6:00 PM
Peak Hour: 4:15 PM to 5:15 PM



	HV %:	PHF
EB	1.0%	0.91
WB	2.8%	0.82
NB	0.0%	0.68
SB	-	-
TOTAL	1.6%	0.95

Two-Hour Count Summaries

Interval Start		River Rd Eastbound				River Rd Westbound				Las Palmas Rd Northbound				0 Southbound				15-min Total	Rolling One Hour
		UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT	UT	LT	TH	RT		
4:00 PM		0	0	157	18	0	4	106	0	0	6	0	2	0	0	0	0	293	0
4:15 PM		**0**	**0**	**208**	**22**	**0**	**2**	**131**	**0**	**0**	**9**	**0**	**3**	**0**	**0**	**0**	**0**	**375**	0
4:30 PM		**0**	**0**	**172**	**20**	**0**	**4**	**162**	**0**	**0**	**17**	**0**	**1**	**0**	**0**	**0**	**0**	**376**	0
4:45 PM		**0**	**0**	**170**	**24**	**0**	**0**	**117**	**0**	**0**	**9**	**0**	**2**	**0**	**0**	**0**	**0**	**322**	1,366
5:00 PM		**0**	**0**	**199**	**23**	**0**	**3**	**126**	**0**	**0**	**8**	**0**	**0**	**0**	**0**	**0**	**0**	**359**	**1,432**
5:15 PM		0	0	207	29	0	2	110	0	0	18	0	3	0	0	0	0	369	1,426
5:30 PM		0	0	172	13	0	1	127	0	0	16	0	2	0	0	0	0	331	1,381
5:45 PM		0	0	170	28	0	1	94	0	0	7	0	2	0	0	0	0	302	1,361
Count Total		0	0	1,455	177	0	17	973	0	0	90	0	15	0	0	0	0	2,727	0
Peak Hour	All	**0**	**0**	**749**	**89**	**0**	**9**	**536**	**0**	**0**	**43**	**0**	**6**	**0**	**0**	**0**	**0**	**1,432**	**0**
	HV	**0**	**0**	**7**	**1**	**0**	**0**	**15**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**23**	**0**
	HV%	-	-	**1%**	**1%**	-	**0%**	**3%**	-	-	**0%**	-	**0%**	-	-	-	-	**2%**	**0**

Note: Two-hour count summary volumes include heavy vehicles but exclude bicycles in overall count.

Interval Start	Heavy Vehicle Totals EB	WB	NB	SB	Total	Bicycles EB	WB	NB	SB	Total	Pedestrians (Crossing Leg) East	West	North	South	Total
4:00 PM	5	2	2	0	*9*	0	0	0	0	*0*	0	0	0	0	*0*
4:15 PM	**2**	**2**	**0**	**0**	***4***	**0**	**0**	**0**	**0**	***0***	**0**	**0**	**0**	**0**	*0*
4:30 PM	**0**	**2**	**0**	**0**	***2***	**0**	**0**	**0**	**0**	***0***	**0**	**0**	**0**	**0**	*0*
4:45 PM	**3**	**7**	**0**	**0**	***10***	**0**	**0**	**0**	**0**	***0***	**0**	**0**	**0**	**0**	*0*
5:00 PM	**3**	**4**	**0**	**0**	***7***	**0**	**0**	**0**	**0**	***0***	**0**	**0**	**0**	**0**	***0***
5:15 PM	3	3	0	0	*6*	0	0	0	0	*0*	0	0	0	0	*0*
5:30 PM	1	3	0	0	*4*	0	0	1	0	*1*	0	0	0	0	*0*
5:45 PM	0	3	0	0	*3*	0	0	0	0	*0*	0	0	0	0	*0*
Count Total	17	26	2	0	*45*	0	0	1	0	*1*	0	0	0	0	*0*
Peak Hr	**8**	**15**	**0**	**0**	***23***	**0**	**0**	**0**	**0**	***0***	**0**	**0**	**0**	**0**	***0***

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Appendix C

Level of Service Calculation Worksheets

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	0	0	221	0	281	136	313	0	0	329	88
Future Volume (veh/h)	0	0	0	221	0	281	136	313	0	0	329	88
Number				7	4	14	1	6	16	5	2	12
Initial Q (Qb), veh				0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)				1.00		0.98	1.00		1.00	1.00		1.00
Parking Bus, Adj				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln				1900	1792	1863	1845	1881	0	0	1863	1900
Adj Flow Rate, veh/h				254	0	323	156	360	0	0	378	101
Adj No. of Lanes				0	1	1	1	1	0	0	1	0
Peak Hour Factor				0.87	0.87	0.87	0.87	0.87	0.87	0.87	0.87	0.87
Percent Heavy Veh, %				2	0	2	3	1	0	0	2	2
Cap, veh/h				541	0	491	189	1035	0	0	533	142
Arrive On Green				0.32	0.00	0.32	0.11	0.55	0.00	0.00	0.38	0.34
Sat Flow, veh/h				1707	0	1550	1757	1881	0	0	1417	379
Grp Volume(v), veh/h				254	0	323	156	360	0	0	0	479
Grp Sat Flow(s),veh/h/ln				1707	0	1550	1757	1881	0	0	0	1796
Q Serve(g_s), s				7.2	0.0	10.8	5.2	6.4	0.0	0.0	0.0	13.7
Cycle Q Clear(g_c), s				7.2	0.0	10.8	5.2	6.4	0.0	0.0	0.0	13.7
Prop In Lane				1.00		1.00	1.00		0.00	0.00		0.21
Lane Grp Cap(c), veh/h				541	0	491	189	1035	0	0	0	675
V/C Ratio(X)				0.47	0.00	0.66	0.83	0.35	0.00	0.00	0.00	0.71
Avail Cap(c_a), veh/h				541	0	491	246	1035	0	0	0	675
HCM Platoon Ratio				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)				1.00	0.00	1.00	1.00	1.00	0.00	0.00	0.00	1.00
Uniform Delay (d), s/veh				16.5	0.0	17.7	26.2	7.5	0.0	0.0	0.0	16.1
Incr Delay (d2), s/veh				2.9	0.0	6.8	16.1	0.9	0.0	0.0	0.0	3.5
Initial Q Delay(d3),s/veh				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln				3.8	0.0	5.5	3.4	3.6	0.0	0.0	0.0	7.3
LnGrp Delay(d),s/veh				19.4	0.0	24.5	42.3	8.4	0.0	0.0	0.0	19.6
LnGrp LOS				B		C	D	A				B
Approach Vol, veh/h					577			516			479	
Approach Delay, s/veh					22.2			18.7			19.6	
Approach LOS					C			B			B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4		6		
Phs Duration (G+Y+Rc), s	10.4	26.6		23.0		37.0		
Change Period (Y+Rc), s	3.7	6.0		4.9		6.0		
Max Green Setting (Gmax), s	6.7	18.6		18.1		31.0		
Max Q Clear Time (g_c+I1), s	7.2	15.7		12.8		8.4		
Green Ext Time (p_c), s	0.1	1.0		1.2		3.2		

Intersection Summary	
HCM 2010 Ctrl Delay	20.3
HCM 2010 LOS	C

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	113	0	96	0	0	0	0	336	697	216	334	0
Future Volume (veh/h)	113	0	96	0	0	0	0	336	697	216	334	0
Number	3	8	18				1	6	16	5	2	12
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1900	1900	1845				0	1863	1881	1845	1845	0
Adj Flow Rate, veh/h	138	0	117				0	410	850	263	407	0
Adj No. of Lanes	0	1	1				0	1	1	1	1	0
Peak Hour Factor	0.82	0.82	0.82				0.82	0.82	0.82	0.82	0.82	0.82
Percent Heavy Veh, %	3	2	3				0	2	1	3	3	0
Cap, veh/h	198	0	172				0	1126	966	290	1493	0
Arrive On Green	0.11	0.00	0.11				0.00	0.60	0.60	0.16	0.81	0.00
Sat Flow, veh/h	1810	0	1568				0	1863	1599	1757	1845	0
Grp Volume(v), veh/h	138	0	117				0	410	850	263	407	0
Grp Sat Flow(s),veh/h/ln	1810	0	1568				0	1863	1599	1757	1845	0
Q Serve(g_s), s	7.3	0.0	7.1				0.0	11.0	44.4	14.5	5.3	0.0
Cycle Q Clear(g_c), s	7.3	0.0	7.1				0.0	11.0	44.4	14.5	5.3	0.0
Prop In Lane	1.00		1.00				0.00		1.00	1.00		0.00
Lane Grp Cap(c), veh/h	198	0	172				0	1126	966	290	1493	0
V/C Ratio(X)	0.70	0.00	0.68				0.00	0.36	0.88	0.91	0.27	0.00
Avail Cap(c_a), veh/h	401	0	347				0	1126	966	302	1493	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	1.00	1.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	42.5	0.0	42.4				0.0	9.9	16.5	40.6	2.3	0.0
Incr Delay (d2), s/veh	4.4	0.0	4.7				0.0	0.2	9.4	28.9	0.5	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.9	0.0	3.3				0.0	5.6	21.9	9.4	2.8	0.0
LnGrp Delay(d),s/veh	46.8	0.0	47.1				0.0	10.1	25.9	69.5	2.8	0.0
LnGrp LOS	D		D					B	C	E	A	
Approach Vol, veh/h		255						1260			670	
Approach Delay, s/veh		46.9						20.8			28.9	
Approach LOS		D						C			C	

Timer	1	2	3	4	5	6	7	8
Assigned Phs		2			5	6		8
Phs Duration (G+Y+Rc), s		84.1			20.3	63.8		14.8
Change Period (Y+Rc), s		6.0			3.7	6.0		4.9
Max Green Setting (Gmax), s		78.1			17.3	57.1		21.0
Max Q Clear Time (g_c+I1), s		7.3			16.5	46.4		9.3
Green Ext Time (p_c), s		9.9			0.1	5.6		0.7

Intersection Summary	
HCM 2010 Ctrl Delay	26.3
HCM 2010 LOS	C

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑	↱	↰	↑↑	↰	↱
Traffic Volume (veh/h)	407	33	8	921	111	12
Future Volume (veh/h)	407	33	8	921	111	12
Number	2	12	1	6	3	18
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1792	1792	1900	1863	1900	1900
Adj Flow Rate, veh/h	457	37	9	1035	125	13
Adj No. of Lanes	2	1	1	2	1	1
Peak Hour Factor	0.89	0.89	0.89	0.89	0.89	0.89
Percent Heavy Veh, %	6	6	0	2	0	0
Cap, veh/h	1486	664	18	2118	175	156
Arrive On Green	0.44	0.44	0.01	0.60	0.10	0.10
Sat Flow, veh/h	3495	1522	1810	3632	1810	1615
Grp Volume(v), veh/h	457	37	9	1035	125	13
Grp Sat Flow(s),veh/h/ln	1703	1522	1810	1770	1810	1615
Q Serve(g_s), s	2.3	0.4	0.1	4.4	1.8	0.2
Cycle Q Clear(g_c), s	2.3	0.4	0.1	4.4	1.8	0.2
Prop In Lane		1.00	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	1486	664	18	2118	175	156
V/C Ratio(X)	0.31	0.06	0.51	0.49	0.71	0.08
Avail Cap(c_a), veh/h	2206	986	276	3372	483	431
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	4.8	4.3	12.9	3.0	11.5	10.8
Incr Delay (d2), s/veh	0.1	0.0	21.4	0.2	5.3	0.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.0	0.2	0.2	2.1	1.1	0.1
LnGrp Delay(d),s/veh	4.9	4.3	34.3	3.2	16.8	11.0
LnGrp LOS	A	A	C	A	B	B
Approach Vol, veh/h	494			1044	138	
Approach Delay, s/veh	4.9			3.4	16.3	
Approach LOS	A			A	B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2				6		8
Phs Duration (G+Y+Rc), s	4.3	15.5				19.7		6.5
Change Period (Y+Rc), s	4.0	4.0				4.0		4.0
Max Green Setting (Gmax), s	4.3	17.0				25.0		7.0
Max Q Clear Time (g_c+I1), s	2.1	4.3				6.4		3.8
Green Ext Time (p_c), s	0.0	7.1				9.0		0.1

Intersection Summary	
HCM 2010 Ctrl Delay	4.9
HCM 2010 LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	0	0	444	0	239	107	216	0	0	526	134
Future Volume (veh/h)	0	0	0	444	0	239	107	216	0	0	526	134
Number				7	4	14	1	6	16	5	2	12
Initial Q (Qb), veh				0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)				1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln				1900	1900	1900	1863	1810	0	0	1881	1900
Adj Flow Rate, veh/h				483	0	260	116	235	0	0	572	146
Adj No. of Lanes				0	1	1	1	1	0	0	1	0
Peak Hour Factor				0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %				0	0	0	2	5	0	0	1	1
Cap, veh/h				555	0	495	140	1062	0	0	657	168
Arrive On Green				0.31	0.00	0.31	0.08	0.59	0.00	0.00	0.45	0.43
Sat Flow, veh/h				1810	0	1615	1774	1810	0	0	1447	369
Grp Volume(v), veh/h				483	0	260	116	235	0	0	0	718
Grp Sat Flow(s),veh/h/ln				1810	0	1615	1774	1810	0	0	0	1816
Q Serve(g_s), s				18.9	0.0	10.0	4.8	4.6	0.0	0.0	0.0	26.8
Cycle Q Clear(g_c), s				18.9	0.0	10.0	4.8	4.6	0.0	0.0	0.0	26.8
Prop In Lane				1.00		1.00	1.00		0.00	0.00		0.20
Lane Grp Cap(c), veh/h				555	0	495	140	1062	0	0	0	825
V/C Ratio(X)				0.87	0.00	0.52	0.83	0.22	0.00	0.00	0.00	0.87
Avail Cap(c_a), veh/h				555	0	495	142	1062	0	0	0	825
HCM Platoon Ratio				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)				1.00	0.00	1.00	1.00	1.00	0.00	0.00	0.00	1.00
Uniform Delay (d), s/veh				24.6	0.0	21.5	34.0	7.4	0.0	0.0	0.0	18.7
Incr Delay (d2), s/veh				16.9	0.0	3.9	31.4	0.5	0.0	0.0	0.0	10.0
Initial Q Delay(d3),s/veh				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln				12.0	0.0	4.9	3.6	2.4	0.0	0.0	0.0	15.7
LnGrp Delay(d),s/veh				41.5	0.0	25.4	65.4	7.8	0.0	0.0	0.0	28.6
LnGrp LOS				D		C	E	A				C
Approach Vol, veh/h					743			351			718	
Approach Delay, s/veh					35.9			26.9			28.6	
Approach LOS					D			C			C	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4		6		
Phs Duration (G+Y+Rc), s	9.9	38.1		27.0		48.0		
Change Period (Y+Rc), s	3.7	6.0		4.9		6.0		
Max Green Setting (Gmax), s	6.3	32.0		22.1		42.0		
Max Q Clear Time (g_c+I1), s	6.8	28.8		20.9		6.6		
Green Ext Time (p_c), s	0.0	1.3		0.4		4.2		

Intersection Summary	
HCM 2010 Ctrl Delay	31.3
HCM 2010 LOS	C

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	69	0	203	0	0	0	0	254	325	252	718	0
Future Volume (veh/h)	69	0	203	0	0	0	0	254	325	252	718	0
Number	3	8	18				1	6	16	5	2	12
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1900	1900	1900				0	1881	1881	1863	1900	0
Adj Flow Rate, veh/h	73	0	216				0	270	346	268	764	0
Adj No. of Lanes	0	1	1				0	1	1	1	1	0
Peak Hour Factor	0.94	0.94	0.94				0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	0	0	0				0	1	1	2	0	0
Cap, veh/h	348	0	311				0	758	644	319	1250	0
Arrive On Green	0.19	0.00	0.19				0.00	0.40	0.40	0.18	0.66	0.00
Sat Flow, veh/h	1810	0	1615				0	1881	1599	1774	1900	0
Grp Volume(v), veh/h	73	0	216				0	270	346	268	764	0
Grp Sat Flow(s),veh/h/ln	1810	0	1615				0	1881	1599	1774	1900	0
Q Serve(g_s), s	1.8	0.0	6.7				0.0	5.3	8.8	7.8	12.3	0.0
Cycle Q Clear(g_c), s	1.8	0.0	6.7				0.0	5.3	8.8	7.8	12.3	0.0
Prop In Lane	1.00		1.00				0.00		1.00	1.00		0.00
Lane Grp Cap(c), veh/h	348	0	311				0	758	644	319	1250	0
V/C Ratio(X)	0.21	0.00	0.70				0.00	0.36	0.54	0.84	0.61	0.00
Avail Cap(c_a), veh/h	743	0	663				0	758	644	432	1250	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	1.00	1.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	18.1	0.0	20.1				0.0	11.1	12.1	21.1	5.2	0.0
Incr Delay (d2), s/veh	0.3	0.0	2.8				0.0	0.3	0.9	10.4	2.2	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.9	0.0	3.2				0.0	2.8	4.0	4.7	6.9	0.0
LnGrp Delay(d),s/veh	18.4	0.0	22.9				0.0	11.4	13.0	31.5	7.5	0.0
LnGrp LOS	B		C					B	B	C	A	
Approach Vol, veh/h		289						616			1032	
Approach Delay, s/veh		21.8						12.3			13.7	
Approach LOS		C						B			B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs		2			5	6		8
Phs Duration (G+Y+Rc), s		39.1			13.6	25.5		14.3
Change Period (Y+Rc), s		6.0			3.7	6.0		4.9
Max Green Setting (Gmax), s		33.1			13.3	16.1		21.0
Max Q Clear Time (g_c+I1), s		14.3			9.8	10.8		8.7
Green Ext Time (p_c), s		5.7			0.3	2.8		0.8

Intersection Summary	
HCM 2010 Ctrl Delay	14.5
HCM 2010 LOS	B

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑	↱	↰	↑↑	↰	↱
Traffic Volume (veh/h)	816	97	9	536	43	6
Future Volume (veh/h)	816	97	9	536	43	6
Number	2	12	1	6	3	18
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1881	1881	1900	1845	1900	1900
Adj Flow Rate, veh/h	859	102	9	564	45	6
Adj No. of Lanes	2	1	1	2	1	1
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	1	1	0	3	0	0
Cap, veh/h	1766	790	18	2290	85	76
Arrive On Green	0.49	0.49	0.01	0.65	0.05	0.05
Sat Flow, veh/h	3668	1599	1810	3597	1810	1615
Grp Volume(v), veh/h	859	102	9	564	45	6
Grp Sat Flow(s),veh/h/ln	1787	1599	1810	1752	1810	1615
Q Serve(g_s), s	4.3	0.9	0.1	1.8	0.6	0.1
Cycle Q Clear(g_c), s	4.3	0.9	0.1	1.8	0.6	0.1
Prop In Lane		1.00	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	1766	790	18	2290	85	76
V/C Ratio(X)	0.49	0.13	0.51	0.25	0.53	0.08
Avail Cap(c_a), veh/h	2541	1137	271	3541	339	302
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	4.5	3.7	13.2	1.9	12.4	12.2
Incr Delay (d2), s/veh	0.2	0.1	21.4	0.1	5.0	0.4
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.1	0.4	0.2	0.8	0.4	0.1
LnGrp Delay(d),s/veh	4.7	3.7	34.6	2.0	17.4	12.6
LnGrp LOS	A	A	C	A	B	B
Approach Vol, veh/h	961			573	51	
Approach Delay, s/veh	4.6			2.5	16.8	
Approach LOS	A			A	B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2				6		8
Phs Duration (G+Y+Rc), s	4.3	17.2				21.5		5.3
Change Period (Y+Rc), s	4.0	4.0				4.0		4.0
Max Green Setting (Gmax), s	4.0	19.0				27.0		5.0
Max Q Clear Time (g_c+I1), s	2.1	6.3				3.8		2.6
Green Ext Time (p_c), s	0.0	6.9				9.6		0.0

Intersection Summary	
HCM 2010 Ctrl Delay	4.2
HCM 2010 LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	0	0	225	0	281	138	317	0	0	331	88
Future Volume (veh/h)	0	0	0	225	0	281	138	317	0	0	331	88
Number				7	4	14	1	6	16	5	2	12
Initial Q (Qb), veh				0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)				1.00		0.98	1.00		1.00	1.00		1.00
Parking Bus, Adj				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln				1900	1792	1863	1845	1881	0	0	1863	1900
Adj Flow Rate, veh/h				259	0	323	159	364	0	0	380	101
Adj No. of Lanes				0	1	1	1	1	0	0	1	0
Peak Hour Factor				0.87	0.87	0.87	0.87	0.87	0.87	0.87	0.87	0.87
Percent Heavy Veh, %				6	0	2	3	1	0	0	2	2
Cap, veh/h				541	0	491	192	1035	0	0	531	141
Arrive On Green				0.32	0.00	0.32	0.11	0.55	0.00	0.00	0.37	0.34
Sat Flow, veh/h				1707	0	1550	1757	1881	0	0	1419	377
Grp Volume(v), veh/h				259	0	323	159	364	0	0	0	481
Grp Sat Flow(s),veh/h/ln				1707	0	1550	1757	1881	0	0	0	1796
Q Serve(g_s), s				7.3	0.0	10.8	5.3	6.5	0.0	0.0	0.0	13.8
Cycle Q Clear(g_c), s				7.3	0.0	10.8	5.3	6.5	0.0	0.0	0.0	13.8
Prop In Lane				1.00		1.00	1.00		0.00	0.00		0.21
Lane Grp Cap(c), veh/h				541	0	491	192	1035	0	0	0	672
V/C Ratio(X)				0.48	0.00	0.66	0.83	0.35	0.00	0.00	0.00	0.72
Avail Cap(c_a), veh/h				541	0	491	246	1035	0	0	0	672
HCM Platoon Ratio				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)				1.00	0.00	1.00	1.00	1.00	0.00	0.00	0.00	1.00
Uniform Delay (d), s/veh				16.5	0.0	17.7	26.2	7.5	0.0	0.0	0.0	16.3
Incr Delay (d2), s/veh				3.0	0.0	6.8	16.6	0.9	0.0	0.0	0.0	3.6
Initial Q Delay(d3),s/veh				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln				3.9	0.0	5.5	3.4	3.6	0.0	0.0	0.0	7.5
LnGrp Delay(d),s/veh				19.5	0.0	24.5	42.7	8.5	0.0	0.0	0.0	19.9
LnGrp LOS				B		C	D	A				B
Approach Vol, veh/h					582			523			481	
Approach Delay, s/veh					22.3			18.9			19.9	
Approach LOS					C			B			B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4		6		
Phs Duration (G+Y+Rc), s	10.6	26.4		23.0		37.0		
Change Period (Y+Rc), s	3.7	6.0		4.9		6.0		
Max Green Setting (Gmax), s	8.7	18.6		18.1		31.0		
Max Q Clear Time (g_c+I1), s	7.3	15.8		12.8		8.5		
Green Ext Time (p_c), s	0.1	0.6		1.2		1.2		

Intersection Summary	
HCM 2010 Ctrl Delay	20.4
HCM 2010 LOS	C

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	113	0	97	0	0	0	0	342	703	216	339	0
Future Volume (veh/h)	113	0	97	0	0	0	0	342	703	216	339	0
Number	3	8	18				1	6	16	5	2	12
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1900	1900	1845				0	1863	1881	1845	1845	0
Adj Flow Rate, veh/h	138	0	118				0	417	857	263	413	0
Adj No. of Lanes	0	1	1				0	1	1	1	1	0
Peak Hour Factor	0.82	0.82	0.82				0.82	0.82	0.82	0.82	0.82	0.82
Percent Heavy Veh, %	0	2	3				0	2	1	3	3	0
Cap, veh/h	198	0	172				0	1126	966	290	1493	0
Arrive On Green	0.11	0.00	0.11				0.00	0.60	0.60	0.16	0.81	0.00
Sat Flow, veh/h	1810	0	1568				0	1863	1599	1757	1845	0
Grp Volume(v), veh/h	138	0	118				0	417	857	263	413	0
Grp Sat Flow(s),veh/h/ln	1810	0	1568				0	1863	1599	1757	1845	0
Q Serve(g_s), s	7.3	0.0	7.2				0.0	11.3	45.2	14.5	5.4	0.0
Cycle Q Clear(g_c), s	7.3	0.0	7.2				0.0	11.3	45.2	14.5	5.4	0.0
Prop In Lane	1.00		1.00				0.00		1.00	1.00		0.00
Lane Grp Cap(c), veh/h	198	0	172				0	1126	966	290	1493	0
V/C Ratio(X)	0.70	0.00	0.69				0.00	0.37	0.89	0.91	0.28	0.00
Avail Cap(c_a), veh/h	401	0	347				0	1126	966	302	1493	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	1.00	1.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	42.5	0.0	42.4				0.0	10.0	16.7	40.6	2.3	0.0
Incr Delay (d2), s/veh	4.4	0.0	4.8				0.0	0.2	10.0	28.9	0.5	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.9	0.0	3.3				0.0	5.9	22.5	9.4	2.9	0.0
LnGrp Delay(d),s/veh	46.8	0.0	47.2				0.0	10.2	26.7	69.5	2.8	0.0
LnGrp LOS	D		D					B	C	E	A	
Approach Vol, veh/h		256						1274			676	
Approach Delay, s/veh		47.0						21.3			28.7	
Approach LOS		D						C			C	

Timer	1	2	3	4	5	6	7	8
Assigned Phs		2			5	6		8
Phs Duration (G+Y+Rc), s		84.1			20.3	63.8		14.8
Change Period (Y+Rc), s		6.0			3.7	6.0		4.9
Max Green Setting (Gmax), s		78.1			17.3	57.1		21.0
Max Q Clear Time (g_c+I1), s		7.4			16.5	47.2		9.3
Green Ext Time (p_c), s		1.5			0.1	4.4		0.7

Intersection Summary	
HCM 2010 Ctrl Delay	26.6
HCM 2010 LOS	C

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑	↱	↰	↑↑	↰	↱
Traffic Volume (veh/h)	407	40	8	921	123	13
Future Volume (veh/h)	407	40	8	921	123	13
Number	2	12	1	6	3	18
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1792	1792	1900	1863	1900	1900
Adj Flow Rate, veh/h	457	45	9	1035	138	15
Adj No. of Lanes	2	1	1	2	1	1
Peak Hour Factor	0.89	0.89	0.89	0.89	0.89	0.89
Percent Heavy Veh, %	6	6	0	2	0	0
Cap, veh/h	1231	550	18	1927	196	175
Arrive On Green	0.36	0.36	0.01	0.54	0.11	0.11
Sat Flow, veh/h	3495	1521	1810	3632	1810	1615
Grp Volume(v), veh/h	457	45	9	1035	138	15
Grp Sat Flow(s),veh/h/ln	1703	1521	1810	1770	1810	1615
Q Serve(g_s), s	2.3	0.4	0.1	4.3	1.7	0.2
Cycle Q Clear(g_c), s	2.3	0.4	0.1	4.3	1.7	0.2
Prop In Lane		1.00	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	1231	550	18	1927	196	175
V/C Ratio(X)	0.37	0.08	0.51	0.54	0.70	0.09
Avail Cap(c_a), veh/h	2511	1122	314	3838	549	490
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	5.4	4.8	11.4	3.4	9.9	9.2
Incr Delay (d2), s/veh	0.2	0.1	21.2	0.2	4.6	0.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.0	0.2	0.2	2.1	1.1	0.1
LnGrp Delay(d),s/veh	5.6	4.9	32.5	3.6	14.5	9.5
LnGrp LOS	A	A	C	A	B	A
Approach Vol, veh/h	502			1044	153	
Approach Delay, s/veh	5.6			3.9	14.0	
Approach LOS	A			A	B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2				6		8
Phs Duration (G+Y+Rc), s	4.2	12.3				16.6		6.5
Change Period (Y+Rc), s	4.0	4.0				4.0		4.0
Max Green Setting (Gmax), s	4.0	17.0				25.0		7.0
Max Q Clear Time (g_c+I1), s	2.1	4.3				6.3		3.7
Green Ext Time (p_c), s	0.0	2.2				6.2		0.1

Intersection Summary	
HCM 2010 Ctrl Delay	5.3
HCM 2010 LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	0	0	452	0	239	109	219	0	0	530	134
Future Volume (veh/h)	0	0	0	452	0	239	109	219	0	0	530	134
Number				7	4	14	1	6	16	5	2	12
Initial Q (Qb), veh				0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)				1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln				1900	1900	1900	1863	1810	0	0	1881	1900
Adj Flow Rate, veh/h				491	0	260	118	238	0	0	576	146
Adj No. of Lanes				0	1	1	1	1	0	0	1	0
Peak Hour Factor				0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %				0	0	0	2	5	0	0	1	1
Cap, veh/h				555	0	495	142	1062	0	0	657	167
Arrive On Green				0.31	0.00	0.31	0.08	0.59	0.00	0.00	0.45	0.43
Sat Flow, veh/h				1810	0	1615	1774	1810	0	0	1449	367
Grp Volume(v), veh/h				491	0	260	118	238	0	0	0	722
Grp Sat Flow(s),veh/h/ln				1810	0	1615	1774	1810	0	0	0	1816
Q Serve(g_s), s				19.4	0.0	10.0	4.9	4.7	0.0	0.0	0.0	27.1
Cycle Q Clear(g_c), s				19.4	0.0	10.0	4.9	4.7	0.0	0.0	0.0	27.1
Prop In Lane				1.00		1.00	1.00		0.00	0.00		0.20
Lane Grp Cap(c), veh/h				555	0	495	142	1062	0	0	0	823
V/C Ratio(X)				0.88	0.00	0.52	0.83	0.22	0.00	0.00	0.00	0.88
Avail Cap(c_a), veh/h				555	0	495	142	1062	0	0	0	823
HCM Platoon Ratio				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)				1.00	0.00	1.00	1.00	1.00	0.00	0.00	0.00	1.00
Uniform Delay (d), s/veh				24.7	0.0	21.5	34.0	7.4	0.0	0.0	0.0	18.8
Incr Delay (d2), s/veh				18.4	0.0	3.9	32.3	0.5	0.0	0.0	0.0	10.5
Initial Q Delay(d3),s/veh				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln				12.4	0.0	4.9	3.7	2.5	0.0	0.0	0.0	15.9
LnGrp Delay(d),s/veh				43.1	0.0	25.4	66.3	7.9	0.0	0.0	0.0	29.3
LnGrp LOS				D		C	E	A				C
Approach Vol, veh/h					751			356			722	
Approach Delay, s/veh					37.0			27.2			29.3	
Approach LOS					D			C			C	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4		6		
Phs Duration (G+Y+Rc), s	10.0	38.0		27.0		48.0		
Change Period (Y+Rc), s	3.7	6.0		4.9		6.0		
Max Green Setting (Gmax), s	6.3	32.0		22.1		42.0		
Max Q Clear Time (g_c+I1), s	6.9	29.1		21.4		6.7		
Green Ext Time (p_c), s	0.0	1.0		0.3		0.8		

Intersection Summary	
HCM 2010 Ctrl Delay	32.1
HCM 2010 LOS	C

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	69	0	206	0	0	0	0	259	330	252	729	0
Future Volume (veh/h)	69	0	206	0	0	0	0	259	330	252	729	0
Number	3	8	18				1	6	16	5	2	12
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1900	1900	1900				0	1881	1881	1863	1900	0
Adj Flow Rate, veh/h	73	0	219				0	276	351	268	776	0
Adj No. of Lanes	0	1	1				0	1	1	1	1	0
Peak Hour Factor	0.94	0.94	0.94				0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	0	0	0				0	1	1	2	0	0
Cap, veh/h	351	0	314				0	755	642	319	1247	0
Arrive On Green	0.19	0.00	0.19				0.00	0.40	0.40	0.18	0.66	0.00
Sat Flow, veh/h	1810	0	1615				0	1881	1599	1774	1900	0
Grp Volume(v), veh/h	73	0	219				0	276	351	268	776	0
Grp Sat Flow(s),veh/h/ln	1810	0	1615				0	1881	1599	1774	1900	0
Q Serve(g_s), s	1.8	0.0	6.8				0.0	5.5	9.0	7.8	12.7	0.0
Cycle Q Clear(g_c), s	1.8	0.0	6.8				0.0	5.5	9.0	7.8	12.7	0.0
Prop In Lane	1.00		1.00				0.00		1.00	1.00		0.00
Lane Grp Cap(c), veh/h	351	0	314				0	755	642	319	1247	0
V/C Ratio(X)	0.21	0.00	0.70				0.00	0.37	0.55	0.84	0.62	0.00
Avail Cap(c_a), veh/h	741	0	661				0	755	642	431	1247	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	1.00	1.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	18.1	0.0	20.1				0.0	11.2	12.3	21.2	5.3	0.0
Incr Delay (d2), s/veh	0.3	0.0	2.8				0.0	0.3	1.0	10.5	2.3	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.9	0.0	3.2				0.0	2.9	4.1	4.7	7.3	0.0
LnGrp Delay(d),s/veh	18.4	0.0	22.9				0.0	11.5	13.2	31.7	7.7	0.0
LnGrp LOS	B		C					B	B	C	A	
Approach Vol, veh/h		292						627			1044	
Approach Delay, s/veh		21.8						12.5			13.8	
Approach LOS		C						B			B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs		2			5	6		8
Phs Duration (G+Y+Rc), s		39.1			13.6	25.5		14.4
Change Period (Y+Rc), s		6.0			3.7	6.0		4.9
Max Green Setting (Gmax), s		33.1			13.3	16.1		21.0
Max Q Clear Time (g_c+I1), s		14.7			9.8	11.0		8.8
Green Ext Time (p_c), s		3.1			0.3	1.2		0.8

Intersection Summary	
HCM 2010 Ctrl Delay	14.6
HCM 2010 LOS	B

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑	↱	↰	↑↑	↰	↱
Traffic Volume (veh/h)	816	112	10	536	53	6
Future Volume (veh/h)	816	112	10	536	53	6
Number	2	12	1	6	3	18
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1881	1881	1900	1845	1900	1900
Adj Flow Rate, veh/h	859	118	11	564	56	6
Adj No. of Lanes	2	1	1	2	1	1
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	1	1	0	3	0	0
Cap, veh/h	1578	706	21	2162	102	91
Arrive On Green	0.44	0.44	0.01	0.62	0.06	0.06
Sat Flow, veh/h	3668	1599	1810	3597	1810	1615
Grp Volume(v), veh/h	859	118	11	564	56	6
Grp Sat Flow(s),veh/h/ln	1787	1599	1810	1752	1810	1615
Q Serve(g_s), s	4.3	1.1	0.1	1.8	0.7	0.1
Cycle Q Clear(g_c), s	4.3	1.1	0.1	1.8	0.7	0.1
Prop In Lane		1.00	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	1578	706	21	2162	102	91
V/C Ratio(X)	0.54	0.17	0.52	0.26	0.55	0.07
Avail Cap(c_a), veh/h	2775	1242	296	3867	370	330
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	5.0	4.1	12.0	2.1	11.2	10.9
Incr Delay (d2), s/veh	0.3	0.1	18.0	0.1	4.6	0.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.1	0.5	0.2	0.9	0.5	0.0
LnGrp Delay(d),s/veh	5.3	4.2	30.0	2.2	15.8	11.2
LnGrp LOS	A	A	C	A	B	B
Approach Vol, veh/h	977			575	62	
Approach Delay, s/veh	5.2			2.7	15.4	
Approach LOS	A			A	B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2				6		8
Phs Duration (G+Y+Rc), s	4.3	14.8				19.1		5.4
Change Period (Y+Rc), s	4.0	4.0				4.0		4.0
Max Green Setting (Gmax), s	4.0	19.0				27.0		5.0
Max Q Clear Time (g_c+I1), s	2.1	6.3				3.8		2.7
Green Ext Time (p_c), s	0.0	4.5				3.2		0.0

Intersection Summary	
HCM 2010 Ctrl Delay	4.7
HCM 2010 LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	0	0	258	0	323	158	364	0	0	380	101
Future Volume (veh/h)	0	0	0	258	0	323	158	364	0	0	380	101
Number				7	4	14	1	6	16	5	2	12
Initial Q (Qb), veh				0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)				1.00		0.98	1.00		1.00	1.00		1.00
Parking Bus, Adj				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln				1900	1792	1863	1845	1881	0	0	1863	1900
Adj Flow Rate, veh/h				297	0	371	182	418	0	0	437	116
Adj No. of Lanes				0	1	1	1	1	0	0	1	0
Peak Hour Factor				0.87	0.87	0.87	0.87	0.87	0.87	0.87	0.87	0.87
Percent Heavy Veh, %				6	0	2	3	1	0	0	2	2
Cap, veh/h				525	0	477	216	1071	0	0	546	145
Arrive On Green				0.31	0.00	0.31	0.12	0.57	0.00	0.00	0.38	0.35
Sat Flow, veh/h				1707	0	1550	1757	1881	0	0	1419	377
Grp Volume(v), veh/h				297	0	371	182	418	0	0	0	553
Grp Sat Flow(s),veh/h/ln				1707	0	1550	1757	1881	0	0	0	1796
Q Serve(g_s), s				9.5	0.0	14.2	6.6	8.0	0.0	0.0	0.0	17.8
Cycle Q Clear(g_c), s				9.5	0.0	14.2	6.6	8.0	0.0	0.0	0.0	17.8
Prop In Lane				1.00		1.00	1.00		0.00	0.00		0.21
Lane Grp Cap(c), veh/h				525	0	477	216	1071	0	0	0	691
V/C Ratio(X)				0.57	0.00	0.78	0.84	0.39	0.00	0.00	0.00	0.80
Avail Cap(c_a), veh/h				525	0	477	243	1071	0	0	0	691
HCM Platoon Ratio				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)				1.00	0.00	1.00	1.00	1.00	0.00	0.00	0.00	1.00
Uniform Delay (d), s/veh				18.9	0.0	20.5	27.9	7.8	0.0	0.0	0.0	18.0
Incr Delay (d2), s/veh				4.4	0.0	11.8	20.7	1.1	0.0	0.0	0.0	6.7
Initial Q Delay(d3),s/veh				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln				5.1	0.0	7.5	4.4	4.4	0.0	0.0	0.0	10.1
LnGrp Delay(d),s/veh				23.2	0.0	32.3	48.6	8.8	0.0	0.0	0.0	24.7
LnGrp LOS				C		C	D	A				C
Approach Vol, veh/h					668			600			553	
Approach Delay, s/veh					28.3			20.9			24.7	
Approach LOS					C			C			C	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4		6		
Phs Duration (G+Y+Rc), s	12.0	29.0		24.0		41.0		
Change Period (Y+Rc), s	3.7	6.0		4.9		6.0		
Max Green Setting (Gmax), s	9.3	22.0		19.1		35.0		
Max Q Clear Time (g_c+I1), s	8.6	19.8		16.2		10.0		
Green Ext Time (p_c), s	0.0	0.5		0.9		1.5		

Intersection Summary	
HCM 2010 Ctrl Delay	24.7
HCM 2010 LOS	C

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	130	0	111	0	0	0	0	392	808	248	389	0
Future Volume (veh/h)	130	0	111	0	0	0	0	392	808	248	389	0
Number	3	8	18				1	6	16	5	2	12
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1900	1900	1845				0	1863	1881	1845	1845	0
Adj Flow Rate, veh/h	159	0	135				0	478	985	302	474	0
Adj No. of Lanes	0	1	1				0	1	1	1	1	0
Peak Hour Factor	0.82	0.82	0.82				0.82	0.82	0.82	0.82	0.82	0.82
Percent Heavy Veh, %	0	2	3				0	2	1	3	3	0
Cap, veh/h	199	0	172				0	1166	1001	317	1539	0
Arrive On Green	0.11	0.00	0.11				0.00	0.63	0.63	0.18	0.83	0.00
Sat Flow, veh/h	1810	0	1568				0	1863	1599	1757	1845	0
Grp Volume(v), veh/h	159	0	135				0	478	985	302	474	0
Grp Sat Flow(s),veh/h/ln	1810	0	1568				0	1863	1599	1757	1845	0
Q Serve(g_s), s	12.3	0.0	12.1				0.0	18.6	86.3	24.5	8.2	0.0
Cycle Q Clear(g_c), s	12.3	0.0	12.1				0.0	18.6	86.3	24.5	8.2	0.0
Prop In Lane	1.00		1.00				0.00		1.00	1.00		0.00
Lane Grp Cap(c), veh/h	199	0	172				0	1166	1001	317	1539	0
V/C Ratio(X)	0.80	0.00	0.78				0.00	0.41	0.98	0.95	0.31	0.00
Avail Cap(c_a), veh/h	275	0	239				0	1166	1001	317	1539	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	1.00	1.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	62.5	0.0	62.4				0.0	13.5	26.2	58.3	2.7	0.0
Incr Delay (d2), s/veh	10.9	0.0	10.9				0.0	0.2	24.5	37.7	0.5	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	6.8	0.0	5.8				0.0	9.6	44.6	15.2	4.3	0.0
LnGrp Delay(d),s/veh	73.4	0.0	73.2				0.0	13.8	50.7	96.0	3.2	0.0
LnGrp LOS	E		E					B	D	F	A	
Approach Vol, veh/h		294						1463			776	
Approach Delay, s/veh		73.3						38.6			39.3	
Approach LOS		E						D			D	

Timer	1	2	3	4	5	6	7	8
Assigned Phs		2			5	6		8
Phs Duration (G+Y+Rc), s		124.1			30.0	94.1		19.8
Change Period (Y+Rc), s		6.0			3.7	6.0		4.9
Max Green Setting (Gmax), s		118.1			26.3	88.1		21.0
Max Q Clear Time (g_c+I1), s		10.2			26.5	88.3		14.3
Green Ext Time (p_c), s		1.8			0.0	0.0		0.6

Intersection Summary	
HCM 2010 Ctrl Delay	42.9
HCM 2010 LOS	D

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑	↱	↰	↑↑	↰	↱
Traffic Volume (veh/h)	468	45	9	1059	140	15
Future Volume (veh/h)	468	45	9	1059	140	15
Number	2	12	1	6	3	18
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1792	1792	1900	1863	1900	1900
Adj Flow Rate, veh/h	526	51	10	1190	157	17
Adj No. of Lanes	2	1	1	2	1	1
Peak Hour Factor	0.89	0.89	0.89	0.89	0.89	0.89
Percent Heavy Veh, %	6	6	0	2	0	0
Cap, veh/h	1363	609	19	2009	215	192
Arrive On Green	0.40	0.40	0.01	0.57	0.12	0.12
Sat Flow, veh/h	3495	1522	1810	3632	1810	1615
Grp Volume(v), veh/h	526	51	10	1190	157	17
Grp Sat Flow(s),veh/h/ln	1703	1522	1810	1770	1810	1615
Q Serve(g_s), s	2.8	0.5	0.1	5.6	2.1	0.2
Cycle Q Clear(g_c), s	2.8	0.5	0.1	5.6	2.1	0.2
Prop In Lane		1.00	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	1363	609	19	2009	215	192
V/C Ratio(X)	0.39	0.08	0.52	0.59	0.73	0.09
Avail Cap(c_a), veh/h	2135	954	284	3329	567	506
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	5.4	4.8	12.6	3.6	10.8	10.0
Incr Delay (d2), s/veh	0.2	0.1	19.5	0.3	4.7	0.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.3	0.2	0.2	2.7	1.3	0.1
LnGrp Delay(d),s/veh	5.6	4.8	32.1	3.9	15.5	10.2
LnGrp LOS	A	A	C	A	B	B
Approach Vol, veh/h	577			1200	174	
Approach Delay, s/veh	5.5			4.1	15.0	
Approach LOS	A			A	B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2				6		8
Phs Duration (G+Y+Rc), s	4.3	14.2				18.5		7.0
Change Period (Y+Rc), s	4.0	4.0				4.0		4.0
Max Green Setting (Gmax), s	4.0	16.0				24.0		8.0
Max Q Clear Time (g_c+I1), s	2.1	4.8				7.6		4.1
Green Ext Time (p_c), s	0.0	2.4				6.9		0.1

Intersection Summary	
HCM 2010 Ctrl Delay	5.5
HCM 2010 LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	0	0	519	0	275	125	251	0	0	609	154
Future Volume (veh/h)	0	0	0	519	0	275	125	251	0	0	609	154
Number				7	4	14	1	6	16	5	2	12
Initial Q (Qb), veh				0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)				1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln				1900	1900	1900	1863	1810	0	0	1881	1900
Adj Flow Rate, veh/h				564	0	299	136	273	0	0	662	167
Adj No. of Lanes				0	1	1	1	1	0	0	1	0
Peak Hour Factor				0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %				0	0	0	2	5	0	0	1	1
Cap, veh/h				585	0	522	156	1064	0	0	661	167
Arrive On Green				0.32	0.00	0.32	0.09	0.59	0.00	0.00	0.46	0.43
Sat Flow, veh/h				1810	0	1615	1774	1810	0	0	1451	366
Grp Volume(v), veh/h				564	0	299	136	273	0	0	0	829
Grp Sat Flow(s),veh/h/ln				1810	0	1615	1774	1810	0	0	0	1817
Q Serve(g_s), s				27.6	0.0	13.8	6.8	6.6	0.0	0.0	0.0	41.0
Cycle Q Clear(g_c), s				27.6	0.0	13.8	6.8	6.6	0.0	0.0	0.0	41.0
Prop In Lane				1.00		1.00	1.00		0.00	0.00		0.20
Lane Grp Cap(c), veh/h				585	0	522	156	1064	0	0	0	828
V/C Ratio(X)				0.96	0.00	0.57	0.87	0.26	0.00	0.00	0.00	1.00
Avail Cap(c_a), veh/h				585	0	522	156	1064	0	0	0	828
HCM Platoon Ratio				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)				1.00	0.00	1.00	1.00	1.00	0.00	0.00	0.00	1.00
Uniform Delay (d), s/veh				29.9	0.0	25.3	40.6	9.0	0.0	0.0	0.0	24.7
Incr Delay (d2), s/veh				29.3	0.0	4.5	38.2	0.6	0.0	0.0	0.0	31.7
Initial Q Delay(d3),s/veh				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln				18.6	0.0	6.8	5.0	3.4	0.0	0.0	0.0	27.7
LnGrp Delay(d),s/veh				59.2	0.0	29.8	78.8	9.6	0.0	0.0	0.0	56.4
LnGrp LOS				E		C	E	A				F
Approach Vol, veh/h					863			409			829	
Approach Delay, s/veh					49.0			32.6			56.4	
Approach LOS					D			C			E	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4		6		
Phs Duration (G+Y+Rc), s	11.9	45.0		33.1		56.9		
Change Period (Y+Rc), s	3.7	6.0		4.9		6.0		
Max Green Setting (Gmax), s	8.2	39.0		28.2		50.9		
Max Q Clear Time (g_c+I1), s	8.8	43.0		29.6		8.6		
Green Ext Time (p_c), s	0.0	0.0		0.0		0.9		

Intersection Summary		
HCM 2010 Ctrl Delay		48.7
HCM 2010 LOS		D

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	79	0	236	0	0	0	0	297	379	290	837	0
Future Volume (veh/h)	79	0	236	0	0	0	0	297	379	290	837	0
Number	3	8	18				1	6	16	5	2	12
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1900	1900	1900				0	1881	1881	1863	1900	0
Adj Flow Rate, veh/h	84	0	251				0	316	403	309	890	0
Adj No. of Lanes	0	1	1				0	1	1	1	1	0
Peak Hour Factor	0.94	0.94	0.94				0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	0	0	0				0	1	1	2	0	0
Cap, veh/h	376	0	336				0	740	629	356	1255	0
Arrive On Green	0.21	0.00	0.21				0.00	0.39	0.39	0.20	0.66	0.00
Sat Flow, veh/h	1810	0	1615				0	1881	1599	1774	1900	0
Grp Volume(v), veh/h	84	0	251				0	316	403	309	890	0
Grp Sat Flow(s),veh/h/ln	1810	0	1615				0	1881	1599	1774	1900	0
Q Serve(g_s), s	2.3	0.0	8.9				0.0	7.4	12.4	10.2	18.2	0.0
Cycle Q Clear(g_c), s	2.3	0.0	8.9				0.0	7.4	12.4	10.2	18.2	0.0
Prop In Lane	1.00		1.00				0.00		1.00	1.00		0.00
Lane Grp Cap(c), veh/h	376	0	336				0	740	629	356	1255	0
V/C Ratio(X)	0.22	0.00	0.75				0.00	0.43	0.64	0.87	0.71	0.00
Avail Cap(c_a), veh/h	653	0	582				0	740	629	438	1255	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	1.00	1.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	20.0	0.0	22.6				0.0	13.4	14.9	23.5	6.6	0.0
Incr Delay (d2), s/veh	0.3	0.0	3.3				0.0	0.4	2.2	14.3	3.4	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.2	0.0	4.2				0.0	3.9	5.8	6.4	10.6	0.0
LnGrp Delay(d),s/veh	20.3	0.0	25.9				0.0	13.8	17.1	37.7	10.0	0.0
LnGrp LOS	C		C					B	B	D	B	
Approach Vol, veh/h		335						719			1199	
Approach Delay, s/veh		24.5						15.7			17.2	
Approach LOS		C						B			B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs		2			5	6		8
Phs Duration (G+Y+Rc), s		44.1			16.2	27.9		16.6
Change Period (Y+Rc), s		6.0			3.7	6.0		4.9
Max Green Setting (Gmax), s		38.1			15.3	19.1		21.0
Max Q Clear Time (g_c+I1), s		20.2			12.2	14.4		10.9
Green Ext Time (p_c), s		3.8			0.3	1.3		0.9

Intersection Summary	
HCM 2010 Ctrl Delay	17.8
HCM 2010 LOS	B

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑↑	↱	↰	↑↑	↰	↱
Traffic Volume (veh/h)	938	127	11	616	59	7
Future Volume (veh/h)	938	127	11	616	59	7
Number	2	12	1	6	3	18
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)		1.00	1.00		1.00	1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1881	1881	1900	1845	1900	1900
Adj Flow Rate, veh/h	987	134	12	648	62	7
Adj No. of Lanes	2	1	1	2	1	1
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	1	1	0	3	0	0
Cap, veh/h	1676	750	23	2223	109	97
Arrive On Green	0.47	0.47	0.01	0.63	0.06	0.06
Sat Flow, veh/h	3668	1599	1810	3597	1810	1615
Grp Volume(v), veh/h	987	134	12	648	62	7
Grp Sat Flow(s),veh/h/ln	1787	1599	1810	1752	1810	1615
Q Serve(g_s), s	5.3	1.3	0.2	2.2	0.9	0.1
Cycle Q Clear(g_c), s	5.3	1.3	0.2	2.2	0.9	0.1
Prop In Lane		1.00	1.00		1.00	1.00
Lane Grp Cap(c), veh/h	1676	750	23	2223	109	97
V/C Ratio(X)	0.59	0.18	0.52	0.29	0.57	0.07
Avail Cap(c_a), veh/h	2593	1160	276	3613	345	308
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	5.1	4.0	12.9	2.1	12.0	11.6
Incr Delay (d2), s/veh	0.3	0.1	16.9	0.1	4.6	0.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.5	0.6	0.2	1.0	0.6	0.1
LnGrp Delay(d),s/veh	5.4	4.1	29.7	2.2	16.6	11.9
LnGrp LOS	A	A	C	A	B	B
Approach Vol, veh/h	1121			660	69	
Approach Delay, s/veh	5.3			2.7	16.1	
Approach LOS	A			A	B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2				6		8
Phs Duration (G+Y+Rc), s	4.3	16.3				20.6		5.6
Change Period (Y+Rc), s	4.0	4.0				4.0		4.0
Max Green Setting (Gmax), s	4.0	19.0				27.0		5.0
Max Q Clear Time (g_c+I1), s	2.2	7.3				4.2		2.9
Green Ext Time (p_c), s	0.0	5.0				3.8		0.0

Intersection Summary	
HCM 2010 Ctrl Delay	4.8
HCM 2010 LOS	A

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	0	0	258	0	323	158	364	0	0	380	101
Future Volume (veh/h)	0	0	0	258	0	323	158	364	0	0	380	101
Number				7	4	14	1	6	16	5	2	12
Initial Q (Qb), veh				0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)				1.00		0.98	1.00		1.00	1.00		1.00
Parking Bus, Adj				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln				1900	1792	1863	1845	1881	0	0	1863	1863
Adj Flow Rate, veh/h				297	0	371	182	418	0	0	437	116
Adj No. of Lanes				0	1	1	1	1	0	0	1	1
Peak Hour Factor				0.87	0.87	0.87	0.87	0.87	0.87	0.87	0.87	0.87
Percent Heavy Veh, %				6	0	2	3	1	0	0	2	2
Cap, veh/h				541	0	491	219	1035	0	0	669	516
Arrive On Green				0.32	0.00	0.32	0.12	0.55	0.00	0.00	0.36	0.33
Sat Flow, veh/h				1707	0	1550	1757	1881	0	0	1863	1583
Grp Volume(v), veh/h				297	0	371	182	418	0	0	437	116
Grp Sat Flow(s),veh/h/ln				1707	0	1550	1757	1881	0	0	1863	1583
Q Serve(g_s), s				8.6	0.0	12.9	6.1	7.7	0.0	0.0	11.8	3.2
Cycle Q Clear(g_c), s				8.6	0.0	12.9	6.1	7.7	0.0	0.0	11.8	3.2
Prop In Lane				1.00		1.00	1.00		0.00	0.00		1.00
Lane Grp Cap(c), veh/h				541	0	491	219	1035	0	0	669	516
V/C Ratio(X)				0.55	0.00	0.76	0.83	0.40	0.00	0.00	0.65	0.22
Avail Cap(c_a), veh/h				541	0	491	272	1035	0	0	669	516
HCM Platoon Ratio				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)				1.00	0.00	1.00	1.00	1.00	0.00	0.00	1.00	1.00
Uniform Delay (d), s/veh				17.0	0.0	18.4	25.7	7.8	0.0	0.0	16.1	14.7
Incr Delay (d2), s/veh				4.0	0.0	10.4	16.2	1.2	0.0	0.0	2.3	0.2
Initial Q Delay(d3),s/veh				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%), veh/ln				4.6	0.0	6.9	3.9	4.3	0.0	0.0	6.4	1.4
LnGrp Delay(d),s/veh				20.9	0.0	28.8	41.9	9.0	0.0	0.0	18.4	14.9
LnGrp LOS				C		C	D	A			B	B
Approach Vol, veh/h					668			600			553	
Approach Delay, s/veh					25.3			19.0			17.7	
Approach LOS					C			B			B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4		6		
Phs Duration (G+Y+Rc), s	11.5	25.5		23.0		37.0		
Change Period (Y+Rc), s	3.7	6.0		4.9		6.0		
Max Green Setting (Gmax), s	9.6	17.7		18.1		31.0		
Max Q Clear Time (g_c+I1), s	8.1	13.8		14.9		9.7		
Green Ext Time (p_c), s	0.1	0.8		0.9		1.4		

Intersection Summary		
HCM 2010 Ctrl Delay		20.9
HCM 2010 LOS		C

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	130	0	111	0	0	0	0	392	808	248	389	0
Future Volume (veh/h)	130	0	111	0	0	0	0	392	808	248	389	0
Number	3	8	18				1	6	16	5	2	12
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1900	1900	1845				0	1863	1881	1845	1845	0
Adj Flow Rate, veh/h	159	0	135				0	478	985	302	474	0
Adj No. of Lanes	0	1	1				0	1	1	2	1	0
Peak Hour Factor	0.82	0.82	0.82				0.82	0.82	0.82	0.82	0.82	0.82
Percent Heavy Veh, %	0	2	3				0	2	1	3	3	0
Cap, veh/h	219	0	190				0	1223	1050	350	1474	0
Arrive On Green	0.12	0.00	0.12				0.00	0.66	0.66	0.10	0.80	0.00
Sat Flow, veh/h	1810	0	1568				0	1863	1599	3408	1845	0
Grp Volume(v), veh/h	159	0	135				0	478	985	302	474	0
Grp Sat Flow(s),veh/h/ln	1810	0	1568				0	1863	1599	1704	1845	0
Q Serve(g_s), s	8.5	0.0	8.3				0.0	11.9	55.3	8.7	7.0	0.0
Cycle Q Clear(g_c), s	8.5	0.0	8.3				0.0	11.9	55.3	8.7	7.0	0.0
Prop In Lane	1.00		1.00				0.00		1.00	1.00		0.00
Lane Grp Cap(c), veh/h	219	0	190				0	1223	1050	350	1474	0
V/C Ratio(X)	0.73	0.00	0.71				0.00	0.39	0.94	0.86	0.32	0.00
Avail Cap(c_a), veh/h	395	0	343				0	1223	1050	350	1474	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	1.00	1.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	42.4	0.0	42.4				0.0	8.0	15.4	44.3	2.7	0.0
Incr Delay (d2), s/veh	4.5	0.0	4.8				0.0	0.2	15.2	19.3	0.6	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.5	0.0	3.9				0.0	6.2	28.5	5.0	3.7	0.0
LnGrp Delay(d),s/veh	47.0	0.0	47.2				0.0	8.2	30.7	63.5	3.3	0.0
LnGrp LOS	D		D					A	C	E	A	
Approach Vol, veh/h		294						1463			776	
Approach Delay, s/veh		47.1						23.3			26.7	
Approach LOS		D						C			C	

Timer	1	2	3	4	5	6	7	8
Assigned Phs		2			5	6		8
Phs Duration (G+Y+Rc), s		84.1			14.3	69.8		16.1
Change Period (Y+Rc), s		6.0			3.7	6.0		4.9
Max Green Setting (Gmax), s		78.1			10.6	63.8		21.0
Max Q Clear Time (g_c+I1), s		9.0			10.7	57.3		10.5
Green Ext Time (p_c), s		1.8			0.0	3.9		0.8

Intersection Summary	
HCM 2010 Ctrl Delay	27.1
HCM 2010 LOS	C

Intersection	
Intersection Delay, s/veh	8.3
Intersection LOS	A

Approach	EB	WB	NB	SB
Entry Lanes	0	1	1	2
Conflicting Circle Lanes	2	2	2	2
Adj Approach Flow, veh/h	0	668	600	553
Demand Flow Rate, veh/h	0	693	609	564
Vehicles Circulating, veh/h	761	609	0	502
Vehicles Exiting, veh/h	187	0	761	422
Follow-Up Headway, s	3.186	3.186	3.186	3.186
Ped Vol Crossing Leg, #/h	0	0	0	0
Ped Cap Adj	1.000	1.000	1.000	1.000
Approach Delay, s/veh	0.0	4.9	9.6	10.9
Approach LOS	-	A	A	B

Lane	Left	Bypass	Left	Left	Bypass
Designated Moves	LT	R	LT	T	R
Assumed Moves	LT	R	LT	T	R
RT Channelized		Free			Free
Lane Util	1.000		1.000	1.000	
Critical Headway, s	4.113		4.113	4.293	
Entry Flow, veh/h	315	378	609	446	118
Cap Entry Lane, veh/h	738	1938	1130	775	1938
Entry HV Adj Factor	0.943	0.980	0.985	0.980	0.980
Flow Entry, veh/h	297	371	600	437	116
Cap Entry, veh/h	696	1900	1113	760	1900
V/C Ratio	0.427	0.195	0.539	0.575	0.061
Control Delay, s/veh	11.1	0.0	9.6	13.8	0.0
LOS	B	A	A	B	A
95th %tile Queue, veh	2	1	3	4	0

Intersection	
Intersection Delay, s/veh	6.6
Intersection LOS	A

Approach	EB	WB	NB	SB
Entry Lanes	1	0	1	2
Conflicting Circle Lanes	1	1	1	1
Adj Approach Flow, veh/h	294	0	1463	776
Demand Flow Rate, veh/h	298	0	1483	799
Vehicles Circulating, veh/h	799	647	470	0
Vehicles Exiting, veh/h	0	311	488	647
Follow-Up Headway, s	3.186	3.186	3.186	3.186
Ped Vol Crossing Leg, #/h	0	0	0	0
Ped Cap Adj	1.000	1.000	1.000	1.000
Approach Delay, s/veh	6.4	0.0	6.4	7.1
Approach LOS	A	-	A	A

Lane	Left	Bypass	Left	Bypass	Left	Right
Designated Moves	LT	R	T	R	L	TR
Assumed Moves	LT	R	T	R	L	TR
RT Channelized		Free		Free		
Lane Util	1.000		1.000		0.389	0.611
Critical Headway, s	5.193		5.193		5.193	5.193
Entry Flow, veh/h	159	139	488	995	311	488
Cap Entry Lane, veh/h	508	1957	706	1919	1130	1130
Entry HV Adj Factor	1.000	0.971	0.980	0.990	0.971	0.971
Flow Entry, veh/h	159	135	478	985	302	474
Cap Entry, veh/h	508	1900	692	1900	1097	1097
V/C Ratio	0.313	0.071	0.691	0.518	0.275	0.432
Control Delay, s/veh	11.8	0.0	19.4	0.0	5.9	7.9
LOS	B	A	C	A	A	A
95th %tile Queue, veh	1	0	6	3	1	2

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	0	0	519	0	275	125	251	0	0	609	154
Future Volume (veh/h)	0	0	0	519	0	275	125	251	0	0	609	154
Number				7	4	14	1	6	16	5	2	12
Initial Q (Qb), veh				0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)				1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln				1900	1900	1900	1863	1810	0	0	1881	1881
Adj Flow Rate, veh/h				564	0	299	136	273	0	0	662	167
Adj No. of Lanes				0	1	1	1	1	0	0	1	1
Peak Hour Factor				0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %				0	0	0	2	5	0	0	1	1
Cap, veh/h				627	0	560	163	989	0	0	755	599
Arrive On Green				0.35	0.00	0.35	0.09	0.55	0.00	0.00	0.40	0.37
Sat Flow, veh/h				1810	0	1615	1774	1810	0	0	1881	1599
Grp Volume(v), veh/h				564	0	299	136	273	0	0	662	167
Grp Sat Flow(s),veh/h/ln				1810	0	1615	1774	1810	0	0	1881	1599
Q Serve(g_s), s				22.2	0.0	11.1	5.7	6.0	0.0	0.0	24.4	5.5
Cycle Q Clear(g_c), s				22.2	0.0	11.1	5.7	6.0	0.0	0.0	24.4	5.5
Prop In Lane				1.00		1.00	1.00		0.00	0.00		1.00
Lane Grp Cap(c), veh/h				627	0	560	163	989	0	0	755	599
V/C Ratio(X)				0.90	0.00	0.53	0.83	0.28	0.00	0.00	0.88	0.28
Avail Cap(c_a), veh/h				627	0	560	166	989	0	0	755	599
HCM Platoon Ratio				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)				1.00	0.00	1.00	1.00	1.00	0.00	0.00	1.00	1.00
Uniform Delay (d), s/veh				23.3	0.0	19.6	33.5	9.1	0.0	0.0	20.7	16.4
Incr Delay (d2), s/veh				18.2	0.0	3.6	28.6	0.7	0.0	0.0	11.4	0.3
Initial Q Delay(d3),s/veh				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln				14.1	0.0	5.5	4.1	3.1	0.0	0.0	14.9	2.5
LnGrp Delay(d),s/veh				41.5	0.0	23.3	62.1	9.8	0.0	0.0	32.1	16.6
LnGrp LOS				D		C	E	A			C	B
Approach Vol, veh/h					863			409			829	
Approach Delay, s/veh					35.2			27.2			29.0	
Approach LOS					D			C			C	

Timer	1	2	3	4	5	6	7	8
Assigned Phs	1	2		4		6		
Phs Duration (G+Y+Rc), s	10.9	34.1		30.0		45.0		
Change Period (Y+Rc), s	3.7	6.0		4.9		6.0		
Max Green Setting (Gmax), s	7.3	28.0		25.1		39.0		
Max Q Clear Time (g_c+I1), s	7.7	26.4		24.2		8.0		
Green Ext Time (p_c), s	0.0	0.6		0.4		0.9		

Intersection Summary	
HCM 2010 Ctrl Delay	31.2
HCM 2010 LOS	C

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	79	0	236	0	0	0	0	297	379	290	837	0
Future Volume (veh/h)	79	0	236	0	0	0	0	297	379	290	837	0
Number	3	8	18				1	6	16	5	2	12
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1900	1900	1900				0	1881	1881	1863	1900	0
Adj Flow Rate, veh/h	84	0	251				0	316	403	309	890	0
Adj No. of Lanes	0	1	1				0	1	1	2	1	0
Peak Hour Factor	0.94	0.94	0.94				0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	0	0	0				0	1	1	2	0	0
Cap, veh/h	400	0	357				0	777	660	416	1170	0
Arrive On Green	0.22	0.00	0.22				0.00	0.41	0.41	0.12	0.62	0.00
Sat Flow, veh/h	1810	0	1615				0	1881	1599	3442	1900	0
Grp Volume(v), veh/h	84	0	251				0	316	403	309	890	0
Grp Sat Flow(s),veh/h/ln	1810	0	1615				0	1881	1599	1721	1900	0
Q Serve(g_s), s	1.9	0.0	7.0				0.0	5.8	9.7	4.2	16.6	0.0
Cycle Q Clear(g_c), s	1.9	0.0	7.0				0.0	5.8	9.7	4.2	16.6	0.0
Prop In Lane	1.00		1.00				0.00		1.00	1.00		0.00
Lane Grp Cap(c), veh/h	400	0	357				0	777	660	416	1170	0
V/C Ratio(X)	0.21	0.00	0.70				0.00	0.41	0.61	0.74	0.76	0.00
Avail Cap(c_a), veh/h	810	0	723				0	777	660	450	1170	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	1.00	1.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	15.6	0.0	17.6				0.0	10.1	11.3	20.8	6.8	0.0
Incr Delay (d2), s/veh	0.3	0.0	2.5				0.0	0.3	1.6	6.0	4.7	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.9	0.0	3.3				0.0	3.1	4.6	2.4	9.9	0.0
LnGrp Delay(d),s/veh	15.8	0.0	20.1				0.0	10.5	12.9	26.8	11.5	0.0
LnGrp LOS	B		C					B	B	C	B	
Approach Vol, veh/h		335						719			1199	
Approach Delay, s/veh		19.0						11.8			15.4	
Approach LOS		B						B			B	

Timer	1	2	3	4	5	6	7	8
Assigned Phs		2			5	6		8
Phs Duration (G+Y+Rc), s		34.1			9.9	24.2		14.8
Change Period (Y+Rc), s		6.0			3.7	6.0		4.9
Max Green Setting (Gmax), s		28.1			6.7	17.7		21.0
Max Q Clear Time (g_c+I1), s		18.6			6.2	11.7		9.0
Green Ext Time (p_c), s		2.9			0.1	1.6		1.0

Intersection Summary	
HCM 2010 Ctrl Delay	14.8
HCM 2010 LOS	B

Intersection	
Intersection Delay, s/veh	24.8
Intersection LOS	C

Approach	EB	WB	NB	SB
Entry Lanes	0	1	1	2
Conflicting Circle Lanes	2	2	2	2
Adj Approach Flow, veh/h	0	863	409	829
Demand Flow Rate, veh/h	0	863	426	838
Vehicles Circulating, veh/h	1233	426	0	703
Vehicles Exiting, veh/h	139	0	1233	287
Follow-Up Headway, s	3.186	3.186	3.186	3.186
Ped Vol Crossing Leg, #/h	0	0	0	0
Ped Cap Adj	1.000	1.000	1.000	1.000
Approach Delay, s/veh	0.0	10.5	7.2	48.5
Approach LOS	-	B	A	E

Lane	Left	Bypass	Left	Left	Bypass
Designated Moves	LT	R	LT	T	R
Assumed Moves	LT	R	LT	T	R
RT Channelized		Free			Free
Lane Util	1.000		1.000	1.000	
Critical Headway, s	4.113		4.113	4.293	
Entry Flow, veh/h	564	299	426	669	169
Cap Entry Lane, veh/h	839	1900	1130	667	1919
Entry HV Adj Factor	1.000	1.000	0.961	0.990	0.990
Flow Entry, veh/h	564	299	409	662	167
Cap Entry, veh/h	839	1900	1086	660	1900
V/C Ratio	0.673	0.157	0.377	1.003	0.088
Control Delay, s/veh	16.0	0.0	7.2	60.8	0.0
LOS	C	A	A	F	A
95th %tile Queue, veh	5	1	2	16	0

Intersection	
Intersection Delay, s/veh	4.8
Intersection LOS	A

Approach	EB	WB	NB	SB
Entry Lanes	1	0	1	2
Conflicting Circle Lanes	1	1	1	1
Adj Approach Flow, veh/h	335	0	719	712
Demand Flow Rate, veh/h	335	0	726	718
Vehicles Circulating, veh/h	718	403	399	0
Vehicles Exiting, veh/h	0	315	403	403
Follow-Up Headway, s	3.186	3.186	3.186	3.186
Ped Vol Crossing Leg, #/h	0	0	0	0
Ped Cap Adj	1.000	1.000	1.000	1.000
Approach Delay, s/veh	2.1	0.0	4.5	6.4
Approach LOS	A	-	A	A

Lane	Left	Bypass	Left	Bypass	Left	Right
Designated Moves	LT	R	T	R	L	TR
Assumed Moves	LT	R	T	R	L	TR
RT Channelized		Free		Free		
Lane Util	1.000		1.000		0.439	0.561
Critical Headway, s	5.193		5.193		5.193	5.193
Entry Flow, veh/h	84	251	319	407	315	403
Cap Entry Lane, veh/h	551	1900	758	1919	1130	1130
Entry HV Adj Factor	1.000	1.000	0.990	0.990	0.981	1.000
Flow Entry, veh/h	84	251	316	403	309	403
Cap Entry, veh/h	551	1900	751	1900	1108	1130
V/C Ratio	0.152	0.132	0.421	0.212	0.279	0.357
Control Delay, s/veh	8.5	0.0	10.3	0.0	5.9	6.7
LOS	A	A	B	A	A	A
95th %tile Queue, veh	1	0	2	1	1	2

Appendix D

Las Palmas Road Entrance Gate

Queuing Analysis

M/M/s/K Queue

Inputs:

Arrival rate (λ)	41
Service rate per server (μ)	600
Number of servers (s)	1
System capacity (K)	6

Steady-State Operating Characteristics

Probability that the system is empty	p_0	0.931667
Probability that the system is full	p_K	0.000000
Average rate that customers enter	$\lambda^*(1-p_K)$	40.999996
Average number of customers in line	L_q	0.005012
Average time spent in line	W_q	0.000122
Average time spent in the system	W	0.001789
Average number of customers in system	L	0.073345
Maximum Utilization	$\lambda/(s\mu)$	0.068333
Effective Utilization (traffic intensity)	ρ	0.068333327

Steady-state Distribution

n	p_n
0	0.931667
1	0.063664
2	0.004350
3	0.000297
4	0.000020
5	0.000001
6	0.000000

M/M/s/K Queue

Inputs:

Arrival rate (λ)	106
Service rate per server (μ)	600
Number of servers (s)	1
System capacity (K)	6

Steady-State Operating Characteristics

Probability that the system is empty	p_0	0.823338
Probability that the system is full	p_K	0.000025
Average rate that customers enter	$\lambda^*(1-p_K)$	105.997347
Average number of customers in line	L_q	0.037875
Average time spent in line	W_q	0.000357
Average time spent in the system	W	0.002024
Average number of customers in system	L	0.214537
Maximum Utilization	$\lambda/(s\mu)$	0.176667
Effective Utilization (traffic intensity)	ρ	0.176662244

Steady-state Distribution

n	p_n
0	0.823338
1	0.145456
2	0.025697
3	0.004540
4	0.000802
5	0.000142
6	0.000025

M/M/s/K Queue

Inputs:

Arrival rate (λ)	48
Service rate per server (μ)	600
Number of servers (s)	1
System capacity (K)	6

Steady-State Operating Characteristics

Probability that the system is empty	p_0	0.920000
Probability that the system is full	p_K	0.000000
Average rate that customers enter	$\lambda^*(1-p_K)$	47.999988
Average number of customers in line	L_q	0.006956
Average time spent in line	W_q	0.000145
Average time spent in the system	W	0.001812
Average number of customers in system	L	0.086956
Maximum Utilization	$\lambda/(s\mu)$	0.080000
Effective Utilization (traffic intensity)	ρ	0.079999981

Steady-state Distribution

n	p_n
0	0.920000
1	0.073600
2	0.005888
3	0.000471
4	0.000038
5	0.000003
6	0.000000

M/M/s/K Queue

Inputs:

Arrival rate (λ)	122
Service rate per server (μ)	600
Number of servers (s)	1
System capacity (K)	6

Steady-State Operating Characteristics

Probability that the system is empty	p_0	0.796678
Probability that the system is full	p_K	0.000056
Average rate that customers enter	$\lambda^*(1-p_K)$	121.993131
Average number of customers in line	L_q	0.051808
Average time spent in line	W_q	0.000425
Average time spent in the system	W	0.002091
Average number of customers in system	L	0.255130
Maximum Utilization	$\lambda/(s\mu)$	0.203333
Effective Utilization (traffic intensity)	ρ	0.203321885

Steady-state Distribution

n	p_n
0	0.796678
1	0.161991
2	0.032938
3	0.006697
4	0.001362
5	0.000277
6	0.000056

M/M/s/K Queue

Inputs:

Arrival rate (λ)	54
Service rate per server (μ)	600
Number of servers (s)	1
System capacity (K)	6

Steady-State Operating Characteristics

Probability that the system is empty	p_0	0.910000
Probability that the system is full	p_K	0.000000
Average rate that customers enter	$\lambda*(1-p_K)$	53.999974
Average number of customers in line	L_q	0.008901
Average time spent in line	W_q	0.000165
Average time spent in the system	W	0.001831
Average number of customers in system	L	0.098901
Maximum Utilization	$\lambda/(s\mu)$	0.090000
Effective Utilization (traffic intensity)	ρ	0.089999956

Steady-state Distribution

n	p_n
0	0.910000
1	0.081900
2	0.007371
3	0.000663
4	0.000060
5	0.000005
6	0.000000

M/M/s/K Queue

Inputs:

Arrival rate (λ)	138
Service rate per server (μ)	600
Number of servers (s)	1
System capacity (K)	6

Steady-State Operating Characteristics

Probability that the system is empty	p_0	0.770026
Probability that the system is full	p_K	0.000114
Average rate that customers enter	$\lambda*(1-p_K)$	137.984269
Average number of customers in line	L_q	0.068489
Average time spent in line	W_q	0.000496
Average time spent in the system	W	0.002163
Average number of customers in system	L	0.298463
Maximum Utilization	$\lambda/(s\mu)$	0.230000
Effective Utilization (traffic intensity)	ρ	0.229973782

Steady-state Distribution

n	p_n
0	0.770026
1	0.177106
2	0.040734
3	0.009369
4	0.002155
5	0.000496
6	0.000114

Keith Higgins

Traffic Engineer

March 4, 2022

Dale Ellis
Anthony Lombardo & Associates
144 W. Gabilan Street
Salinas, CA 93901

Re: Riverview Estates Subdivision - Traffic Effects from Expansion from 28 to 30 Lots, Monterey County, CA

Dear Dale,

Per your recent request, this letter describes the effects of the modification of the Riverview Estates Subdivision from 28 to 30 lots, Monterey County, CA. It is based on the "Riverview at Las Palmas Residential Subdivision Transportation Impact Analysis," Keith Higgins Traffic Engineer, January 19, 2022 (Project Traffic Study).

A. Project Trip Generation

As indicated on **Attachment A**, the current 30-lot proposal is about 7% larger than the previous 28-lot proposal. The current 30-lot proposal will generate about 283 daily trips with 21 during the AM peak hour and 28 during the PM peak hour. This compares with the previous 28 lot proposal which would generate about 264 daily trips with 20 AM peak hour trips and 26 PM peak hour trips. The current proposal would result in an increase of about 19 daily trips with one additional AM peak hour trip and two additional PM peak hour trips.

B. Intersection Levels of Service

Attachment B provides a comparison of levels of service at the Reservation Road / Highway 68 WB Ramps, River Road / Highway 68 EB Ramps and Las Palmas Road / River Road intersections between the previous 28-lot project proposal with the current 30-lot proposal for Existing plus Project and Cumulative plus Project conditions. Existing levels of service are also included. The original 28 lot proposal was expected to result in imperceptible increases in delay and no change in level of service from existing conditions. The increase of two lots above the previous proposal associated with current 30-lot project will result in virtually no change in delay and level of service compared to the previous proposal under both Existing plus Project and Cumulative plus Project conditions. The conclusions and recommendations in the Project Traffic Study are unchanged regarding intersection traffic operations.

C. Road Segment Levels of Service

The previous 28-lot proposal was expected to result in an increase about 3 AM peak hour trips and 4 PM peak hour trips to the two-lane segment of Hwy 68 immediately west of the Toro Park interchange. Only about 14% of the anticipated increase in Project trip generation of one AM peak hour trip and two PM peak hour trips will be added to the two-lane segment of Highway 68. This is less than one peak hour trip on average, which is an immeasurable increase and will not result in any change in the conclusions and recommendations in the Project Traffic Study.

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D. Las Palmas 1 Neighborhood Streets

The current proposal will result in an increase of 19 daily trips along the access route through Las Palmas 1 from River Road to the Project site. This includes Las Palmas Road, River Run Road, and Woodbridge Court.

Las Palmas Road will carry about 2,506 daily trips compared to the estimate of 2,487 vehicles per day in the project traffic study which is an imperceptible increase of less than 1%. The resulting traffic volume will continue to be well below the 3,000 vehicle-per-day threshold for a Monterey County Secondary Street or the typical carrying capacity of 10,000 vehicles per day for a two lane collector street.

River Run Road will carry about 1,233 vehicles per day, compared to 1,214 resulting from the previous 28-lot proposal. This is an increase of about 1.6% which is imperceptible. River Run Road will carry daily traffic volumes about 40% below the Level of Service C threshold for a modified secondary/tertiary street.

Woodbridge Court conforms to the standards of a Monterey County Loop Street. This street can provide access to 30 homes or less, which is the number of homes included in the current Project proposal.

The Las Palmas Road / River Road and River Road / Woodbridge Court intersections within Las Palmas 1 both operate at Level of Service A. The addition of 1 to 2 peak hour trips from the two additional homes will be imperceptible. Both intersections will continue to operate at LOS A.

The proposed addition of two lots will not change its effects on traffic operations within Las Palmas 1.

E. Las Palmas 1 Entrance Traffic Operations

The addition of two homes to the Project will result in an increase of about one inbound trip at the Las Palmas 1 Entrance on Las Palmas Road compared to the increase previously anticipated from the Project. This would increase the total PM peak hour total entering volume in the Cumulative plus Project scenario from 138 vehicles to 139 vehicles, or about 0.7%. This compares with a service capacity of about 600 vehicles per hour. This would not change the anticipated queue lengths and would thus have an imperceptible effect on Las Palmas Road at the entrance to Las Palmas 1.

F. Summary and Conclusion

The addition of two homesites to the proposed Riverview Estates Subdivision will not qualitatively change Project traffic impacts. No changes are required to the analysis and recommendations in the "Riverview at Las Palmas Residential Subdivision Transportation Impact Analysis."

If you have any questions regarding this evaluation, please do not hesitate to contact me at your convenience.

Thank you for the opportunity to assist you with this project.

Respectfully submitted,

Keith Higgins

Keith B. Higgins, PE, TE
Enclosures

Previous and Current Single Family Residential Subdivision Trip Generation

TRIP GENERATION RATES[1]	ITE Land Use Code	Daily Trip Rate	AM Peak Hour				PM Peak Hour			
			Peak Hour Rate	% of ADT	% In	% Out	Peak Hour Rate	% of ADT	% In	% Out
Single-Family Detached Housing	210	9.43	0.7	7%	26%	74%	0.94	10%	63%	37%
GENERATED TRIPS	**Project Size**	**Daily Trips**	**Peak Hour Trips**	**% of ADT**	**Trips Inbound**	**Trips Outbound**	**Peak Hour Trips**	**% of ADT**	**Trips Inbound**	**Trips Outbound**
CURRENT 30-LOT PROPOSAL	30 Homes	283	21	7%	5	16	28	10%	18	10
PREVIOUS 28-LOT PROPOSAL	28 Homes	264	20	8%	5	15	26	10%	16	10
CURRENT PROPOSAL INCREASE ABOVE PREVIOUS PROPOSAL	2 Homes	19	1		0	1	2		1	1
CURRENT PROPOSAL PERCENT INCREASE ABOVE PREVIOUS PROPOSAL	7%									

Notes:
1. Trip generation rates published by Institute of Transportation Engineers, Trip Generation," 11th Edition, 2021.

Attachment A
Current and Previous
Project Trip Generation
Comparison

	N-S Street	E-W Street	Existing Lane Configuration	Existing Intersection Control	LOS Standard	Existing Conditions				Existing + Project Conditions								Cumulative + Project Conditions							
										Previous Project - 28 Lots				Current Project - 30 Lots				Previous Project - 28 Lots				Current Project - 30 Lots			
						AM Peak Hr.		PM Peak Hr.		AM Peak Hr.		PM Peak Hr.		AM Peak Hr.		PM Peak Hr.		AM Peak Hr.		PM Peak Hr.		AM Peak Hr.		PM Peak Hr.	
						Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS
1	Reservation Road	Highway 68 WB Ramps	NB 1-L, 1-T SB 1-T/R WB 1-L/T, 1-R	Signal	Caltrans C	20.3	C	31.3	C	20.3	C	32.0	C	20.3	C	32.1	C	24.6	C	48.7	D	24.6	C	48.8	D
				Miti 1														20.8	C	31.1	C	20.8	C	31.1	C
				Miti 2														8.2	A	24.8	C	8.2	A	24.8	C
2	River Road	Highway 68 EB Ramps	NB 1-T, 1-R SB 1-L, 1-T EB 1-L/T, 1-R	Signal	Caltrans C	26.3	C	14.5	B	26.5	C	14.6	B	26.5	C	14.6	B	42.7	D	17.8	B	42.7	D	17.8	B
				Miti 1														27.0	C	14.8	B	27.0	C	14.8	B
				Miti 2														6.5	A	9.9	A	6.5	A	9.9	A
3	Las Palmas Road	River Road	NB 1-L, 1-R EB 2-T, 1-R WB 1-L, 2-T	Signal	County D	4.9	A	4.2	A	5.0	A	4.4	A	5.0	A	4.4	A	5.3	A	4.4	A	5.3	A	4.4	A

Notes:
1 L, T, R = Left, Through, Right
2 NB, SB, EB, WB = Northbound, Southbound, Eastbound, Westbound
3 Highlighted levels of service exceed jurisdiction's LOS standard.
4 Miti 1 = Add SBR at Intersection #1 and 2nd SBL at Intersection #2.
5 Miti 2 = Convert Intersections #1 and #2 to roundabouts.

Attachment B
Current and Previous Project Intersection Levels of Service Comparison

RIVER VIEW at LAS PALMAS

TWENTY-SEVEN LOT ALTERNATIVE PROJECT

Following the Planning Commission hearing in November 2023, the applicants revised the project to be a 27-lot subdivision consisting of 23 market rate units and 4 moderate income units. The revised VTM is attached. The revised map follows essentially the same design as the previous submittal with these changes:

- The upper loop road has been moved to the south to provide a substantial agricultural buffer consistent with MCGP 2020 Policy AG-1.2.
- Lots sizes have been adjusted to create 4 lots (lots 7-10) for moderate income housing. The lots are upper loop road and will be designed and built to be consistent, although smaller, with market rate homes to be built in the subdivision.

Prior to the November 2023 hearing, Monterey County Housing and Community Development Department (HCD) commissioned Rincon to prepare an Augmentation of the Final Supplemental Environmental Impact Report (September 2023) to further review the alternatives to the original River View project up to and including the potential impacts of a 30-lot subdivision. That Augmentation concluded "Therefore, the environmentally superior alternative that would partially meet the objectives of the proposed project would be the reduced no project/existing zoning (30-unit subdivision) alternative (page 22)." The 27-lot alternative would have a proportionally lesser impact.

LAS PALMAS RANCH UNIT 1 HOME OWNERS

The applicants have continued to work with the homeowners in Las Palmas Unit 1 and continue to have their support for an alternative project.

AFFORDABLE HOUSING

There have been numerous discussions with HCD regarding alternative means to meet the project's affordable housing obligation. Project costs have been heavily impacted by delays, substantial economic changes driven by rising interest rates, high rates of inflation, and increased cost of labor and materials. That, combined with the added costs of transportation, HOA fees, sewer fees, taxes and upkeep does not allow for very-low or low-income homes to be economically viable. A moderate-income unit is marginally viable.

Based on the County's affordability schedules and County's implementation of the housing ordinance and housing element requirements:

- The maximum income for a family of four to qualify as moderate is $110,540.
- The maximum sales price for a 3-bedroom (4 residents) moderate-income unit is, based on the County's affordability schedule, $441,724.
- Annual housing cost is limited to 35% of the annual family income. Dollar limits are $3,224 per month, $38,689 per year.
- The County estimates the cost to build an affordable 900 SF, 3-bedroom unit, including land cost, to be $297,000 ($330.00 SF).

- The maximum affordable sales price at 7% interest is $350,300.

This model however does not account for two things:

1. A 900 SF home will be substantially smaller than other homes in the neighborhood. The applicant's intention is to build these units in range of 1,200-1,500 SF ($396,000-$495,000).
2. The housing cost does not include the added cost of HOA ($162/month), high sewer fees ($140/month) and added transportation costs (conservatively, $250/month) based on the location, lack of immediate services and lack of public transportation. Collectively these added costs ($500-$550/month further reduces the allowable sales price by $55,000-$60,000.

In-Lieu Fees:

The applicants propose four on-site moderate-income units. The applicants do not propose to use in-lieu fees in place of on-site units but would accept that alternative if it is the County's preference. We have previously written about how this project would meet the "specific characteristics of the development site, such as lack of access to services, zoning which requires large lot development, or potentially high site maintenance costs, make the site unsuitable for households at the required income levels" requirements of MCC Section 18.40.090 A.4

TRAFFIC AND FINDINGS OF OVERRIDING CONSIDERATION

This project, or any discretionary project which adds even one trip to Highway 68, is deemed to have a potentially significant and unavoidable impacts, at project specific and at a cumulative level.

It is important to recognize the history of the development of Las Palmas Ranch, its anticipated traffic impact and implemented mitigations. The traffic impacts of the Las Palmas development were analyzed and addressed through the LPRSP and its EIR. The LPRSP prescribed specific traffic mitigations for a project larger than that which was approved. Those mitigations included payment of fees to a County fund to expand River Road to four lanes and improvements to the River Road/Highway 68 intersection. In later phases of the construction of Las Palmas Ranch the developers, with the approval of the County, chose to build the necessary improvements. Those mitigations were based on traffic estimates developed in the LPRSP EIR and documented in the LPRSP and through conditions of project approvals.

To assess the potential impacts of the original RVLP project Hatch Mott McDonald (HMM) reviewed the LPRSP EIR, LPRSP, previous project conditions of approval, improvements that had been constructed. Traffic counts from all of the LPR entrance points were taken. Their reports were included as part of the original project application and were the basis for the traffic findings of the FSEIR. The HMM report concluded:

1. The LSRSP EIR estimated trip generation for the Las Palmas Ranch development at 11, 721 trips per day.
2. Based on updated traffic counts, Las Palmas Ranch is generating, on average, 7,646 trips per day.
3. The cumulative traffic generation (existing plus project (original project)) is 8,059 trips per day, 3,662 trips less per day that originally estimated for Las Palmas Ranch.
5. All of the traffic improvements prescribed for Las Palmas Ranch, which were for the estimate 11,721 trips, to mitigate its impacts on River Road and Highway 68 have been completed.
6. No additional traffic mitigations are required for the proposed project.

However, because traffic will be added to Highway 68 a statement of overriding consideration must be adopted stating the project will result in development that will provide benefits to the surrounding community and the County has a whole. The project would provide the following benefits to the public:

1. The project would provide additional housing in an area that needs residential units due to a housing shortage.
2. The project would provide 4 on-site moderate-income housing units housing units.
3. By subdividing and developing the lots with single family dwellings, the County would benefit from the increased property tax.
4. The increase of residents due to the increased housing units would contribute to an increase of local spending.
5. Temporary constructions jobs would increase to develop the vacant lots.
6. Approval would recognize the mitigations implemented by the Las Palmas Ranch development for its traffic impacts based on much higher traffic estimates than the current measured traffic from the existing Las Palmas Ranch development.
7. Approval would allow development of the last undeveloped portion of Las Palmas Ranch identified for development in the LPRSP, the 2010 General Plan, 2010 Toro Area Plan and historic zoning at approximately 65% of what might have been otherwise allowed.

PROJECT INCENTIVE(S)

The project is 27 units (23 market, 4 moderate). The base number of units is 22 (23-1 for the legal lot). As such the project is contributing 18% of the base units for moderate income housing and is entitled to one incentive (MCC21.65.070 (A) (c)), unless it is determined that:

1. That the incentive is not necessary in order to provide for affordable housing costs; or
2. That the incentive would result in specific adverse impacts upon the public health, safety, or the physical environment for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the development unaffordable to very-low, low, and moderate-income households.
3. That the incentive would be contrary to the County's certified Local Costal Program or State or Federal law.

The applicants propose an incentive of waiver of all fees and priority processing for the processing and approval of the final map, including improvement plans and documents, and building permits for the inclusionary units.

CONCLUSION

The FSEIR prepared for the RV-1 project concluded RV-1's impact could readily be mitigated to an insignificant level with routine mitigations. The FSEIR also evaluated alternatives to the RV-1, including a 40-unit residential project and concluded that 40-unit alternative would have an equivalent impact to the RV-1 project. As discussed in this narrative, the proposed 27 lot alternative would have a proportionally lesser impact than either the RV-1 project or the 40-unit alternative.

The applicants have worked extensively with the LPR-1 residents to address their concerns and now have substantial support from those residents.

All issues including aesthetics, traffic, water, waste water, etc. have between the FSEIR, prior staff review and recommendations, Planning Commission recommendations, Board of Supervisors hearings, updated plans and this narrative, have been fully addressed.

Exhibit H

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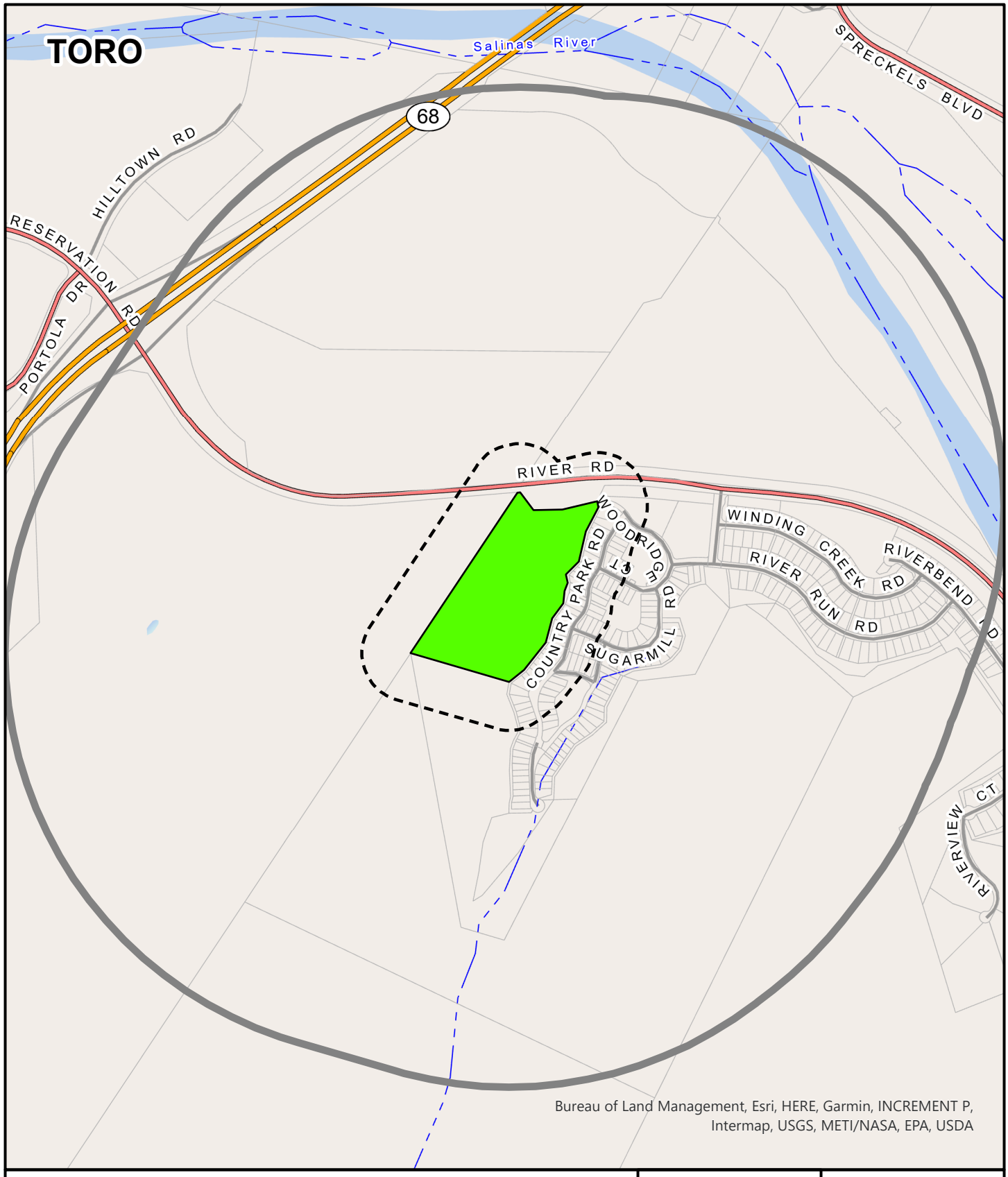

APPLICANT: RIVER VIEW AT LAS PALMAS LLC

APN: 139-211-035-000 **FILE #** PLN150372

Project Site | 300 FT Buffer | 2500 FT Buffer

N

0 600

Feet

PLANNER: ZOE ZE

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Exhibit I

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NOLAND HAMERLY ETIENNE & HOSS
Attorneys at Law | A PROFESSIONAL CORPORATION

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April 27, 2022

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** Leslie E. Finnegan*
Lindsey Berg-James
Anne Frassetto Olsen
Heidi A. Quinn
Sharilyn Payne
Daniel J. Little
Jacob Weeks
William H. Shearer

Harry L. Noland (1904-1991)
Paul M. Hamerly (1920-2000)
Myron E. Etienne, Jr. (1924-2016)
Peter T. Hoss (1934-2018)

** CERTIFIED SPECIALIST IN PROBATE, ESTATE PLANNING, AND TRUST LAW BY THE CALIFORNIA BOARD OF LEGAL SPECIALIZATION STATE BAR OF CALIFORNIA*

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

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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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Introduced: 3/6/2024
Version: 1

Current Status: Agenda Ready
Matter Type: Planning Item

PLN190155 - ELLA INDUSTRIES INC

Public hearing to consider an after-the-fact approval for the construction of a private road and installation of associated utilities to serve four parcels on slopes in excess of 25%. Approval would partially clear Code Enforcement violation (21CE00499).

Project Location: Less than ½ mile northeast of the intersection of Lewis Road and Vega Road, Royal Oaks (the nearest address is 146 Vega Road, Royal Oaks).

Proposed CEQA action: Find the project categorically exemption pursuant to CEQA Guidelines Section 15303(d) and no exceptions under Section 15300.2 can be made.

RECOMMENDATIONS

It is recommended that the Planning Commission adopt a resolution to:

1. Find that the project qualifies for a Class 3 Categorical Exemption pursuant to CEQA Guidelines Section 15303(d) and none of the exceptions listed under Section 15300.2 apply; and
2. Approve a Use Permit to:
    a. Legalize grading and paving over a portion of an unimproved road to partially clear Code Enforcement violation (21CE00499); and
    b. Allow development on slopes in excess of 25% for construction of a private road and a utility trench to serve four future home sites.

The attached draft resolution includes findings and evidence for consideration (**Exhibit A**). Staff recommends approval subject to 8 conditions of approval.

PROJECT INFORMATION

Agent: Trinh Retterer
Property Owner: Ella Industries, Inc.
APN: 117-471-003-000, 117-471-004-000, 117-471-007-000, and 117-471-016-000
Parcel Size: 29.435 acres, 23.029 acres, 27.20 acres, and 21.61 acres
Zoning: Low Density Residential, 5 acres per unit or "LDR/5"
Plan Area: North County Area Plan
Flagged and Staked: No

SUMMARY

This application was initiated and received by the County in May of 2019 for the construction of a private access road to make improvements to an existing logging road/jeep trail, associated utilities to serve four future home sites, stormwater controls, and a water distribution system to service four future

home sites. The Applicant began working on the application process with HCD-Planning when in 2021, the project received a violation (21CE00499) due to the removal of excess soil that had eroded from the hillside following a series of elevated precipitation events. Staff conducted a site inspection on March 30, 2023 and concluded that the project includes development on slopes in excess of 25%. The project has since been revised to remove the water distribution system and allow after-the-fact development on slopes in excess of 25% .

DISCUSSION

Site Development Standards

The project is consistent with the applicable development standards from the base zoning district. The four properties are as follows: Parcel "A" (21.612 acres), Parcel "B" (27.20 acres), Parcel "C" (29.435 acres), and Parcel "D" (23.029 acres). There is an existing access easement on Parcels A, B and C, connecting all four parcels to Vega Road. Following a series of elevated precipitation events in 2021, the Applicant received a Code Enforcement violation (21CE00499) for removing excess erosion dirt from the existing logging road/jeep trail and paving a portion of the access road to help stabilize the soil during high precipitation events. This application includes an after-the-fact Use Permit to legalize grading and paving on slopes to abate the violation and a Use Permit to allow development on slopes for the conversion of the existing logging road within the access easement into a paved private access road. A new utility trench will also be installed within the access road to provide future utilities to all four parcels for future development projects.

Development on Slopes

There is an existing access easement on the parcels to allow access from Vega Road to all four parcels. Within the access easement, there is an existing logging road/jeep trail. The proposed development includes developing the existing road into a new permanent paved road with future utilities installed within the access road for future development of the four parcels. There was evidence of erosion following a series of elevated precipitation events that occurred at the end of 2021. The Owner tried to replace the displaced soil back to its original location and paved a small portion at the beginning of the access road to help stabilize the soil from further erosion and received a code violation in the process. Staff conducted a site inspection on March 30, 2023 confirming that there was development on slopes in excess of 25%, as well as the removal of vegetation, creating a potential hazard for further erosion. The after-the-fact portion of this permit includes a Use Permit to legalize grading that occurred on and adjacent to the logging road within Parcels A and B. The Owner hired Storesund Consulting to provide a Geotechnical Evaluation (see **Exhibit C**) and engineering plan for the new access road and utility trench to provide stability to the road. Proposed development includes grading and paving of the access road with site utilities installed within the road for the future development of the four parcels. Storesund Consulting provided a follow-up Addendum Letter (see **Exhibit D**) confirming that the associated road improvements for the new paved access road will help stabilize the highly erodible soil and provide enhanced site stability as a result of engineered slopes in excess of 25%. The proposed development is also consistent with the Monterey County General Plan Policy OS-3.5 as it would stabilize the highly erodible soil and building the new road within the footprint of the existing road will minimize impacts to the surrounding environment. Storesund Consulting also included a stormwater management plan that includes infiltration ponds to encourage controlled filtration and minimize further erosion.

Tree Removal

An Oak Restoration and Forest Management Plan (see **Exhibit B**) was provided by Ono Consulting, who observed that the eucalyptus plantings on the parcels were planted in uniform rows with spacing of 10-20 feet on center, providing evidence that the eucalyptus trees were used as a plantation and harvested two to three times with multi-clustered stems ranging from 10-24 inches in diameter. There is little native vegetation in the surrounding area around the eucalyptus trees. Due to the high precipitation events that happened at the end of 2021 and subsequent erosion events, some of the eucalyptus trees have been removed due to storm damage on Parcels A and B. Other trees were removed during subsequent grading as a result from the storms, although the total number of trees removed has not been confirmed. Since eucalyptus is not a native tree in the North County Area Plan, the Oak Restoration and Forest Management Plan does not recommend to replace the removed trees with eucalyptus, but rather to plant with native oak and Coast live oak trees instead to help the area recover as a natural oak woodland habitat. The Oak Restoration and Forest Management Plan also addressed removing all eucalyptus trees across all four parcels and replanting with Oak and Coast live oak trees.

However, the plantings of oak trees can take years to mature and provide ample ground stabilization, and there are concerns of potential erosion that still may occur while waiting for the oak trees to mature. **Exhibit D** addresses concerns regarding the implementation of the Oak Restoration and Forest Management Plan, indicating that the years it takes for oak trees to become established and stabilize the soil across all four parcels, as well as the development and growth of native plantings and understory, can leave the site vulnerable to further erosion. The number of trees proposed for removal would be a far greater impact than the impact of the road development. It is the recommendation from Storesund Consulting to not proceed with the Oak Restoration and Forest Management Plan. Eucalyptus trees are not protected by the County's policies, and Staff agrees that there is not a nexus for implementing the Oak Restoration and Forest Management Plan.

The County has addressed concerns for restoring the site after the road work is complete through implementation of a non-standard restoration plan condition that was reviewed and approved by the Applicant. The restoration plan will focus on replanting the previously removed eucalyptus trees with oak and Coast live oak trees and restoring areas of disturbance due to the proposed road work. The restoration also encourages the removal of invasive species such as Himalayan Blackberry to allow for native plants and understory to grow, replacing removed eucalyptus trees with native oak and Coast live oak trees and an invasive species eradication plan to remove any non-native plants to allow native understory plants to grow.

Violations

The Owner submitted a Use permit application to the County in May of 2019. During the time of working through the permit application process with the County, a series of elevated precipitation events (atmospheric rivers) came through the project site in October of 2021. The Owner experienced high erosion along the existing jeep trail and began to remove the excess soil from the access road and paved a portion that was experiencing a high level of erosion to better stabilize the road. At this time, the Owner received a notice of violation from the County's Code Enforcement for the construction of a new road. During grading to remove the eroded soil, the Owner conducted work within areas of

slopes in excess of 25%. Therefore, it was determined that a Use Permit would be required. The violation will be partially cleared through this entitlement once all conditions have been met. Once the grading permit for the violation is finaled, the violation will be fully abated.

CEQA

CEQA Guidelines section 15303(d) categorically exempts new construction, including water main, sewage, electrical, gas, other utility extensions, and street improvements. The project consists of improving an existing road and installing new utilities in a trench within the road to service four future home sites, consistent with the intent of this exemption, and none of the exceptions from CEQA guidelines section 15300.2 apply in this case:

- The location of a project site is not within any environmentally sensitive habitat areas;
- The surround parcels in the immediate area of location to the four parcels have direct access to established roads and would not require additional access roads. Therefore, successive projects of the same type and in the same place (construction of an access road) would not contribute to a significant cumulative impact;
- The proposed development area consists of highly erodible soil and the proposed roadwork, stormwater controls, and restoration plan will help to stabilize the erodible soil on slopes in excess of 25%. There are no other unusual circumstances regarding this project that would cause a significant effect to the environment;
- The project would not cause damage to scenic resources within view of a state scenic highway;
- The project is not on a hazardous waste site listed pursuant to Section 65962.5 of the Government Code; and
- The project would not cause a substantial adverse change to a historical resource.

OTHER AGENCY INVOLVEMENT

The following agencies have reviewed the project, have comments, and/or have recommended conditions:

HCD-Engineering Services
Environmental Health Bureau
HCD-Environmental Services
North County Fire Protection District

Prepared by: Hya Honorato, Assistant Planner, x5173
Reviewed by: Anna Ginette Quenga, AICP, Principal Planner
Approved by: Melanie Beretti, AICP, Acting Chief of Planning

The following attachments are on file with HCD:

Exhibit A - Draft Resolution including:

- Recommended Conditions of Approval
- Site Plan

Exhibit B - Oak Restoration/Forest Management Plan (LIB230067)
Exhibit C - Geotechnical Evaluation (LIB230068)
Exhibit D - Geotechnical Addendum Letter (LET_STORESUND)

Exhibit E - Vicinity Map

cc: Front Counter Copy; North County Fire Protection District; HCD-Environmental Services; HCD-Engineering Services; Environmental Health Bureau; Hya Honorato, Assistant Planner; Anna Quenga, AICP, Principal Planner; Ella Industries, Inc., Applicant; Trinh Retterer (JRG Attorneys at Law), Agent; The Open Monterey Project; LandWatch (Executive Director); Lozeau Drury LLP; Planning File PLN190155

County of Monterey Planning Commission

Agenda Item No. 4

Legistar File Number: PC 24-024

Item No.4

Board of Supervisors
Chambers
168 W. Alisal St., 1st Floor
Salinas, CA 93901

March 13, 2024

Introduced: 3/6/2024
Version: 1

Current Status: Agenda Ready
Matter Type: Planning Item

PLN190155 - ELLA INDUSTRIES INC

Public hearing to consider an after-the-fact approval for the construction of a private road and installation of associated utilities to serve four parcels on slopes in excess of 25%. Approval would partially clear Code Enforcement violation (21CE00499).

Project Location: Less than ½ mile northeast of the intersection of Lewis Road and Vega Road, Royal Oaks (the nearest address is 146 Vega Road, Royal Oaks).

Proposed CEQA action: Find the project categorically exemption pursuant to CEQA Guidelines Section 15303(d) and no exceptions under Section 15300.2 can be made.

RECOMMENDATIONS

It is recommended that the Planning Commission adopt a resolution to:

1. Find that the project qualifies for a Class 3 Categorical Exemption pursuant to CEQA Guidelines Section 15303(d) and none of the exceptions listed under Section 15300.2 apply; and
2. Approve a Use Permit to:
    a. Legalize grading and paving over a portion of an unimproved road to partially clear Code Enforcement violation (21CE00499); and
    b. Allow development on slopes in excess of 25% for construction of a private road and a utility trench to serve four future home sites.

The attached draft resolution includes findings and evidence for consideration (**Exhibit A**). Staff recommends approval subject to 8 conditions of approval.

PROJECT INFORMATION

Agent: Trinh Retterer
Property Owner: Ella Industries, Inc.
APN: 117-471-003-000, 117-471-004-000, 117-471-007-000, and 117-471-016-000
Parcel Size: 29.435 acres, 23.029 acres, 27.20 acres, and 21.61 acres
Zoning: Low Density Residential, 5 acres per unit or "LDR/5"
Plan Area: North County Area Plan
Flagged and Staked: No

SUMMARY

This application was initiated and received by the County in May of 2019 for the construction of a private access road to make improvements to an existing logging road/jeep trail, associated utilities to serve four future home sites, stormwater controls, and a water distribution system to service four future

home sites. The Applicant began working on the application process with HCD-Planning when in 2021, the project received a violation (21CE00499) due to the removal of excess soil that had eroded from the hillside following a series of elevated precipitation events. Staff conducted a site inspection on March 30, 2023 and concluded that the project includes development on slopes in excess of 25%. The project has since been revised to remove the water distribution system and allow after-the-fact development on slopes in excess of 25% .

DISCUSSION

Site Development Standards

The project is consistent with the applicable development standards from the base zoning district. The four properties are as follows: Parcel "A" (21.612 acres), Parcel "B" (27.20 acres), Parcel "C" (29.435 acres), and Parcel "D" (23.029 acres). There is an existing access easement on Parcels A, B and C, connecting all four parcels to Vega Road. Following a series of elevated precipitation events in 2021, the Applicant received a Code Enforcement violation (21CE00499) for removing excess erosion dirt from the existing logging road/jeep trail and paving a portion of the access road to help stabilize the soil during high precipitation events. This application includes an after-the-fact Use Permit to legalize grading and paving on slopes to abate the violation and a Use Permit to allow development on slopes for the conversion of the existing logging road within the access easement into a paved private access road. A new utility trench will also be installed within the access road to provide future utilities to all four parcels for future development projects.

Development on Slopes

There is an existing access easement on the parcels to allow access from Vega Road to all four parcels. Within the access easement, there is an existing logging road/jeep trail. The proposed development includes developing the existing road into a new permanent paved road with future utilities installed within the access road for future development of the four parcels. There was evidence of erosion following a series of elevated precipitation events that occurred at the end of 2021. The Owner tried to replace the displaced soil back to its original location and paved a small portion at the beginning of the access road to help stabilize the soil from further erosion and received a code violation in the process. Staff conducted a site inspection on March 30, 2023 confirming that there was development on slopes in excess of 25%, as well as the removal of vegetation, creating a potential hazard for further erosion. The after-the-fact portion of this permit includes a Use Permit to legalize grading that occurred on and adjacent to the logging road within Parcels A and B. The Owner hired Storesund Consulting to provide a Geotechnical Evaluation (see **Exhibit C**) and engineering plan for the new access road and utility trench to provide stability to the road. Proposed development includes grading and paving of the access road with site utilities installed within the road for the future development of the four parcels. Storesund Consulting provided a follow-up Addendum Letter (see **Exhibit D**) confirming that the associated road improvements for the new paved access road will help stabilize the highly erodible soil and provide enhanced site stability as a result of engineered slopes in excess of 25%. The proposed development is also consistent with the Monterey County General Plan Policy OS-3.5 as it would stabilize the highly erodible soil and building the new road within the footprint of the existing road will minimize impacts to the surrounding environment. Storesund Consulting also included a stormwater management plan that includes infiltration ponds to encourage controlled filtration and minimize further erosion.

Tree Removal

An Oak Restoration and Forest Management Plan (see **Exhibit B**) was provided by Ono Consulting, who observed that the eucalyptus plantings on the parcels were planted in uniform rows with spacing of 10-20 feet on center, providing evidence that the eucalyptus trees were used as a plantation and harvested two to three times with multi-clustered stems ranging from 10-24 inches in diameter. There is little native vegetation in the surrounding area around the eucalyptus trees. Due to the high precipitation events that happened at the end of 2021 and subsequent erosion events, some of the eucalyptus trees have been removed due to storm damage on Parcels A and B. Other trees were removed during subsequent grading as a result from the storms, although the total number of trees removed has not been confirmed. Since eucalyptus is not a native tree in the North County Area Plan, the Oak Restoration and Forest Management Plan does not recommend to replace the removed trees with eucalyptus, but rather to plant with native oak and Coast live oak trees instead to help the area recover as a natural oak woodland habitat. The Oak Restoration and Forest Management Plan also addressed removing all eucalyptus trees across all four parcels and replanting with Oak and Coast live oak trees.

However, the plantings of oak trees can take years to mature and provide ample ground stabilization, and there are concerns of potential erosion that still may occur while waiting for the oak trees to mature. **Exhibit D** addresses concerns regarding the implementation of the Oak Restoration and Forest Management Plan, indicating that the years it takes for oak trees to become established and stabilize the soil across all four parcels, as well as the development and growth of native plantings and understory, can leave the site vulnerable to further erosion. The number of trees proposed for removal would be a far greater impact than the impact of the road development. It is the recommendation from Storesund Consulting to not proceed with the Oak Restoration and Forest Management Plan. Eucalyptus trees are not protected by the County's policies, and Staff agrees that there is not a nexus for implementing the Oak Restoration and Forest Management Plan.

The County has addressed concerns for restoring the site after the road work is complete through implementation of a non-standard restoration plan condition that was reviewed and approved by the Applicant. The restoration plan will focus on replanting the previously removed eucalyptus trees with oak and Coast live oak trees and restoring areas of disturbance due to the proposed road work. The restoration also encourages the removal of invasive species such as Himalayan Blackberry to allow for native plants and understory to grow, replacing removed eucalyptus trees with native oak and Coast live oak trees and an invasive species eradication plan to remove any non-native plants to allow native understory plants to grow.

Violations

The Owner submitted a Use permit application to the County in May of 2019. During the time of working through the permit application process with the County, a series of elevated precipitation events (atmospheric rivers) came through the project site in October of 2021. The Owner experienced high erosion along the existing jeep trail and began to remove the excess soil from the access road and paved a portion that was experiencing a high level of erosion to better stabilize the road. At this time, the Owner received a notice of violation from the County's Code Enforcement for the construction of a new road. During grading to remove the eroded soil, the Owner conducted work within areas of

slopes in excess of 25%. Therefore, it was determined that a Use Permit would be required. The violation will be partially cleared through this entitlement once all conditions have been met. Once the grading permit for the violation is finaled, the violation will be fully abated.

CEQA

CEQA Guidelines section 15303(d) categorically exempts new construction, including water main, sewage, electrical, gas, other utility extensions, and street improvements. The project consists of improving an existing road and installing new utilities in a trench within the road to service four future home sites, consistent with the intent of this exemption, and none of the exceptions from CEQA guidelines section 15300.2 apply in this case:

- The location of a project site is not within any environmentally sensitive habitat areas;
- The surround parcels in the immediate area of location to the four parcels have direct access to established roads and would not require additional access roads. Therefore, successive projects of the same type and in the same place (construction of an access road) would not contribute to a significant cumulative impact;
- The proposed development area consists of highly erodible soil and the proposed roadwork, stormwater controls, and restoration plan will help to stabilize the erodible soil on slopes in excess of 25%. There are no other unusual circumstances regarding this project that would cause a significant effect to the environment;
- The project would not cause damage to scenic resources within view of a state scenic highway;
- The project is not on a hazardous waste site listed pursuant to Section 65962.5 of the Government Code; and
- The project would not cause a substantial adverse change to a historical resource.

OTHER AGENCY INVOLVEMENT

The following agencies have reviewed the project, have comments, and/or have recommended conditions:

HCD-Engineering Services
Environmental Health Bureau
HCD-Environmental Services
North County Fire Protection District

Prepared by: Hya Honorato, Assistant Planner, x5173
Reviewed by: Anna Ginette Quenga, AICP, Principal Planner
Approved by: Melanie Beretti, AICP, Acting Chief of Planning

The following attachments are on file with HCD:

Exhibit A - Draft Resolution including:

- Recommended Conditions of Approval
- Site Plan

Exhibit B - Oak Restoration/Forest Management Plan (LIB230067)
Exhibit C - Geotechnical Evaluation (LIB230068)
Exhibit D - Geotechnical Addendum Letter (LET_STORESUND)

Exhibit E - Vicinity Map

cc: Front Counter Copy; North County Fire Protection District; HCD-Environmental Services; HCD-Engineering Services; Environmental Health Bureau; Hya Honorato, Assistant Planner; Anna Quenga, AICP, Principal Planner; Ella Industries, Inc., Applicant; Trinh Retterer (JRG Attorneys at Law), Agent; The Open Monterey Project; LandWatch (Executive Director); Lozeau Drury LLP; Planning File PLN190155

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Exhibit A

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DRAFT RESOLUTION

Before the Planning Commission
in and for the County of Monterey, State of California

In the matter of the application of:
ELLA INDUSTRIES INC (PLN190155)
RESOLUTION NO. ----
Resolution by the Monterey County Planning Commission:

1) Finding that the project qualifies for a Class 3 Categorical Exemption pursuant to CEQA Guidelines Section 15303(d) and none of the exceptions listed in Section 15300.2 apply; and
2) Approving a Use Permit to:
    a. Legalize grading and paving over a portion of an unimproved road to partially clear Code Enforcement violation (21CE00499); and
    b. Allow development on slopes in excess of 25% for construction of a private road and utility trench to serve four future home sites.

[PLN190155 ELLA INDUSTRIES INC, Less than ½ mile northeast of the intersection of Lewis Road and Vega Road, Royal Oaks, North County Area Plan (APNs: 117-471-003-000, 117-471-004-000, 117-471-007-000 and 117-471-016-000)]

The ELLA INDUSTRIES INC application (PLN190155) came on for public hearing before the Monterey County Planning Commission on March 13, 2024. Having considered all the written and documentary evidence, the administrative record, the staff report, oral testimony, and other evidence presented the Monterey County Planning Commission finds and decides as follows:

FINDINGS

1. FINDING: **CONSISTENCY** – The Project, as conditioned, is consistent with the applicable plans and policies which designate this area as appropriate for development.

EVIDENCE: a) During the course of review of this application, the project has been reviewed for consistency with the text, policies, and regulations in:
- the 2010 Monterey County General Plan;
- North County Area Plan; and
- Monterey County Zoning Ordinance (Title 21).

No conflicts were found to exist. No communications were received during the course of review of the project indicating any inconsistencies with the text, policies, and regulations in these documents.

b) Allowed Use. The properties are located off of Vega Road, less than ½ mile northeast of the intersection of Lewis Road and Vega Road, Royal Oaks (Assessor's Parcel Numbers [APNs]: 117-471-003-000, 117-471-004-000, 117-471-007-000 and 117-471-016-000), within the North County Area Plan. The parcels are zoned as Low Density Residential with a maximum gross density of five acres per unit or "LDR/5"; however Parcel "A" (APN: 117-470-016-000) has a portion of the lot designated with a maximum gross density of two and a half acres per unit that is not within the area of proposed development. The project includes after-the-fact approval of a Use Permit to legalize the grading and development on slopes in excess of 25% that had previously occurred due to erosion from winter storms and approval to allow the proposed development on slopes in excess of 25% to allow the construction of a private road on slopes. The road is an existing logging/jeep trail within a roadway access easement that is being converted to a private access road with future utilities to be installed within (below) the road for future residential development of the four parcels. Therefore, the project is an allowed land use for this site.

c) Lot Legality. Parcel A is a 21.612-acre lot that is shown in its current size and configuration as Parcel D of MS-72-383 on Parcel Map Volume 10, page 163. Parcel "B" (APN: 117-471-007-000) is a 27.20-acre lot that is shown in its current size and configuration as Parcel C of MS-73-50 on Parcel Map Volume 6, page 31. Parcel "C" (APN: 117-471-003-000) is a 29.435-acre lot and Parcel "D" (APN: 117-471-004-000) is a 23.029-acre lot, both shown in their current size and configuration on the 1965 Record of Survey Map, Volume 7, page 86, both parcels were verified as separate ownerships during the time of the survey. Therefore, the County recognizes the properties as legal lots of record.

d) Development Standards. The four parcels are currently undeveloped and there are no proposed development projects, other than roadway and utility installation, at this time. Parcel A sits to the west and has the closest access to Vega Road. Parcel B is directly adjacent to Parcel A's east property line. Parcel C is to the east of Parcel B and to the west of Parcel D. Parcel D sits the furthest east of the 4 parcels. There is an existing access easement that exists on Parcels A. B, and C, connecting all four parcels to Vega Rd. Previous development includes grading that had previously occurred due to erosion from winter storms. The proposed development includes converting the existing jeep trail into a private access road within the access easement. A utility trench will be installed below the new access road to provide future utilities to the parcels for future development projects. There was a portion of the access road at the approach on Parcel A that has been paved to provide stability to the road during high volume rainstorms to avoid further erosion issues.

e) Tree Removal. There is a grove of eucalyptus trees on the south end of all four parcels. An Oak Restoration and Forest Management Plan (LIB230067 – see Finding 2, Evidence "b") was prepared by Ono Consulting. Ono
Consulting observed that the eucalyptus plantings on the parcels were planted in uniform rows with spacing of 10-20 feet on center, there was evidence that the eucalyptus trees were harvested two to three times with multi-clustered stems ranging from 10-24 inches in diameter, indicating that the trees were primarily used as a plantation. There is little native vegetation in the surrounding area around the eucalyptus trees. Due to the high precipitation events that happened at the end of 2021 and subsequent erosion events, some of the eucalyptus trees have been removed due to storm damage on Parcels A and B. Other trees were removed during subsequent grading as a result from the storms, although the total number of trees removed has not been confirmed. Since eucalyptus is not a native tree in the North County Area Plan, the Oak Restoration and Forest Management Plan does not recommend replacing the removed trees with eucalyptus, but rather to plant with native oak and Coast live oak trees instead to help the area recover as a natural oak woodland habitat. The Oak Restoration and Forest Management Plan also addressed removing all eucalyptus trees across all four parcels and replanting with Oak and Coast live oak trees. However, the plantings of oak trees can take years to mature and provide ample ground stabilization, and there are concerns of potential erosion that still may occur while waiting for the oak trees to mature. Storesund Consulting provided an Addendum Letter (LET_STORESUND – see Finding 2, Evidence "b") with a recommendation to not proceed with the Oak Restoration and Forest Management Plan. Eucalyptus trees are not protected by the County's policies, and Staff agrees that there is not a nexus for implementing the Oak Restoration and Forest Management Plan.

A restoration plan implemented through Condition No.3 will focus on replanting the previously removed eucalyptus trees with oak and Coast live oak trees and restoring areas of disturbance due to the proposed road work. The restoration also encourages the removal of invasive species such as Himalayan Blackberry to allow for native plants and understory to grow, replacing removed eucalyptus trees with native oak and Coast live oak trees and an invasive species eradication plan to remove any non-native plantings to allow native understory plants to grow. There is no proposed tree removal for this project. In accordance with the Migratory Bird Treaty Act, a pre-construction nesting survey will be required prior to any tree removal and/or before construction begins through implementation of Condition No. 4.

f) Land Use Advisory Committee (LUAC). The project was not referred to the North County Land Use Advisory Committee (LUAC) for review because it does not involve a public hearing for Design Approval, a Lot Line Adjustment, or preparation of an Initial Study.

g) The project planner conducted a site inspection on March 30, 2023 to verify that the project on the subject parcel conforms to the plans listed above.
h) The application, project plans, and related support materials submitted by the project applicant to Monterey County HCD-Planning found in Project File PLN190155.

2. FINDING: **SITE SUITABILITY –** The site is physically suitable for the proposed development and/or use.

EVIDENCE:
a) The project has been reviewed for site suitability by the following departments and agencies: HCD-Planning, HCD-Engineering Services, HCD-Environmental Services, Environmental Health Bureau, and North County Fire Protection District. County staff reviewed the application materials and plans to verify that the project on the subject site conforms to the applicable plans and regulations, and there has been no indication from these departments/agencies that the site is not suitable for the development. Conditions recommended have been incorporated.
b) Staff identified potential impacts to the project. The following report have been prepared:
- "Oak Restoration and Forest Management Plan" (LIB230067) prepared by Frank Ono, Pacific Grove, CA, March 8, 2022.
- "Geotechnical Evaluation" (LIB230068) prepared by Rune Storesund, Kensington, CA, April 25, 2023.
- "Addendum Letter" (LET_STORESUND) prepared by Rune Storesund, Kensington, CA, April 27, 2023.

County staff independently reviewed these reports and concur with the conclusions. There are no physical or environmental constraints that would indicate that the site is not suitable for the use. All development shall be in accordance with these reports.
c) An encroachment permit shall be required prior to work commencement on the connection from the private access road to Vega Road and shall be implemented through Condition No. 7.
d) Staff conducted a site inspection on March 30, 2023 to verify that the site is suitable for this use.
e) The application, project plans, and related support materials submitted by the project applicant to Monterey County HCD-Planning found in Project File PLN190155.

3. FINDING: **DEVELOPMENT ON SLOPES –** There is no feasible alternative which would allow development to occur on slopes of less than 25% and the proposed development better achieves the resource protection objectives and policies contained in the 2010 General Plan and North County Land Use Plan.

EVIDENCE:
a) The existing roadway has been identified as an established roadway/trail since the 1950s due to satellite imaging provided in an Addendum Letter (LET_STORESUND – see Finding 2, Evidence "b") prepared by Storesund Consulting. The Applicant has submitted an application to develop the roadway into a permanent paved access road to the four parcels. Following a series of elevated precipitation events, there was

evidence of erosion from areas where the ground cover and eucalyptus trees were removed. The Owner tried to replace the displaced soil back to its original location and these actions led to the County issuing a code violation (see Finding 5). A site inspection was conducted by Staff on March 30, 2023, confirming that grading had been completed without a permit, as well as development on slopes in excess of 25% and the removal of vegetation, creating a potential hazard for erosion.

b) The roadway is located within an existing 50-foot wide right of way access easement as shown on maps filed in Volume 10 of Parcel Maps, page 163; Volume 6 of Parcel Maps, page 31; and Volume 7 of Record of Surveys, page 86. Approximately 68% of the easement area contain slopes less than 25% while the remaining 32% of the easement area contain slopes in excess of 25%. This right of way is the only access easement dedicated to allow ingress and egress of the subject parcels. Therefore, there is no alternative available to avoid slopes in excess of 25%.

c) A Geotechnical Evaluation (LIB230068 – see Finding 2, Evidence "b") was prepared by Storesund Consulting confirming that the soil is primarily loamy sand. Although loamy sand is moderately erodible, Storesund Consulting identified loose soils in the roadway and provided recommendations for engineered fill materials, compaction, and paving that will provide stability to the loose soil.

d) An Addendum Letter (LET_STORESUND – see Finding 2, Evidence "b") prepared by Storesund Consulting confirmed that the associated road improvement work will help to stabilize the highly erodible soil and provide enhanced site stability as a result of engineered slopes in excess of 25%. Due to the length of time needed for woodland oak to re-establish in the area, Storesund Consulting also recommended installing stormwater infiltration ponds to capture stormwater and encourage controlled filtration into the underlying soils and groundwater table to minimize further erosion. Stormwater pollution prevention and other wastewater controls shall be implemented through Condition No. 8.

4. FINDING: **HEALTH AND SAFETY –** The establishment, maintenance, or operation of the project applied for will not under the circumstances of this particular case be detrimental to the health, safety, peace, morals, comfort, and general welfare of persons residing or working in the neighborhood of such proposed use, or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.

EVIDENCE:

a) The project was reviewed by HCD-Planning, HCD- Engineering Services, HCD-Environmental Services, Environmental Health Bureau, and North County Fire Protection District. The respective agencies have recommended conditions, where appropriate, to ensure that the project will not have an adverse effect on the health, safety, and welfare of persons either residing or working in the neighborhood.

b) There is no need for potable water or wastewater for the sites at this time. Proposed future utilities will be installed to provide access to all

four parcels for future development. Implementation of the project would not result in an increase demand on these services.

c) As demonstrated in Finding 3, the project will provide enhanced stability of the highly erodible soils through the establishment of a new, improved road and long-term stormwater management controls.

d) Staff conducted a site inspection on March 30, 2023 to verify that the site is suitable for this use.

e) The application, project plans, and related support materials submitted by the project applicant to Monterey County HCD-Planning found in Project File PLN190155.

5. FINDING: **VIOLATIONS –** The subject property shall comply with all rules and regulations pertaining to zoning uses, subdivision, and any other applicable provisions of the County's zoning ordinance. A violation exists on the property and approval of this permit would partially abate said violation.

EVIDENCE:

a) Staff reviewed Monterey County HCD-Planning and HCD-Building Services records and is aware of a violation (21CE00499) existing on subject property for grading and construction of a roadway. The violation was reported in 2021 when the applicant was removing excess soil that had eroded onto the existing jeep trail following a series of winter storms and paving a portion of the road that connects the access road to Vega Rd to help stabilize the soil and prevent further erosion. Staff conducted a site inspection on March 30, 2023 and concluded that there was evidence of grading and clearing of vegetation onsite, including grading on slopes in excess of 25%. An Addendum Letter (LET_STORESUND – see Finding 2, Evidence "b") prepared by Storesund Consulting showing evidence of an existing roadway through satellite imaging from the 1950s and 1960s. Storesund Consulting also agreed that a new paved roadway on engineered slopes will stabilize the soil on slopes and proposed work includes the new roadway as well as installing utilities for future use to all four parcels within the roadway. Therefore, Staff recognizes that the violation in question is grading without a permit and development on slopes in excess of 25% and associated planning fees have been paid.

b) An Oak Restoration and Forest Management Plan (LIB230067 – see Finding 2, Evidence "b") was provided by Ono Consulting, the restoration plan concluded that the area would benefit from replacing all eucalyptus trees with native oak and Coast live oak trees rather than replanting eucalyptus trees since these trees are not native to the area. However, the Addendum Letter by Storesund strongly suggests that oak restoration would take years to establish and could potentially create more erosion issues due to the amount of time needed for oak trees to become establish. The Oak Restoration and Forest Management Plan is significantly disproportionate to the violation and the removed eucalyptus trees are not native trees in the North County Area Plan, it was therefore not recommended to pursue restoration of all four parcels. Restoration of the disturbed areas only will be implemented through Condition No. 3.

c) The violation will be partially abated to meet the zoning requirements through this entitlement once all conditions have been met. Upon the issuance of associated grading permit(s), associated fines paid, and finaling of grading permit(s) for the violation, the violation will be fully abated.

d) The application, project plans, and related support materials submitted by the project applicant to Monterey County HCD-Planning found in Project File PLN190155.

6. FINDING: **CEQA (Exempt) –** The project is categorically exempt from environmental review and no unusual circumstances were identified to exist for the proposed project.

EVIDENCE: a) California Environmental Quality Act (CEQA) Guidelines Section 15303(d) categorically exempts new construction, including water main, sewage, electrical, gas, other utility extensions, and street improvements.

b) The project consists of improving an existing road and installing new utilities in a trench within the road to service four future home sites.

c) None of the exceptions under CEQA Guidelines Section 15300.2 apply to this project:

- The location of a project site is not within any Environmentally Sensitive Habitat Areas;
- The surround parcels in the immediate area of location to the four parcels have direct access to established roads and would not require additional access roads. Therefore, successive projects of the same type and in the same place (construction of an access road) would not contribute to a significant cumulative impact;
- The proposed development area consists of highly erodible soil and the proposed roadwork, stormwater controls, and restoration plan will help to stabilize the erodible soil on slopes in excess of 25%. There are no other unusual circumstances regarding this project that would cause a significant effect to the environment;
- The project site is not visible from any scenic highways, and the proposed development would not result in damages to scenic resources;
- The project site is not located on or near any hazardous waste sites listed in Section 65962.5 of the Government Code; and
- The project does not involve any identified historical resources.

d) No adverse environmental effects were identified during staff review of the development application during a site visit on March 30, 2023.

e) See supporting Finding Nos. 1 and 2. The application, project plans, and related support materials submitted by the project applicant to Monterey County HCD-Planning found in Project File PLN190155.

7. FINDING: **APPEALABILITY –** The decision on this project may be appealed to the Board of Supervisors.

EVIDENCE: Pursuant to Title 21 Section 21.80.050.A, an appeal of the Planning Commission's approval for this project may be made to the Board of Supervisors by any public agency or person aggrieved by their decision.

DECISION

NOW, THEREFORE, based on the above findings and evidence, the Planning Commission does hereby:

1. Find that the project qualifies for a Class 3 Categorical Exemption pursuant to CEQA Guidelines Section 15303(d) and none of the exceptions listed in Section 15300.2 apply; and
2. Approve a Use Permit to:
    a. Legalize grading and paving over a portion of an unimproved road to partially clear Code Enforcement violation (21CE00499); and
    b. Allow development on slopes in excess of 25% for construction of a private road and a utility trench to serve four future home sites.

All of which are in general conformance with the attached sketch and subject to the attached conditions**,** all being attached hereto and incorporated herein by reference.

PASSED AND ADOPTED this 13th day of March, 2024, upon motion of _____, seconded by _____, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
Melanie Beretti, AICP
Planning Commission Secretary

COPY OF THIS DECISION MAILED TO APPLICANT ON _____

THIS APPLICATION IS APPEALABLE TO THE BOARD OF SUPERVISORS. IF ANYONE WISHES TO APPEAL THIS DECISION, AN APPEAL FORM MUST BE COMPLETED AND SUBMITTED TO THE CLERK TO THE BOARD ALONG WITH THE APPROPRIATE FILING FEE ON OR BEFORE _____.

This decision, if this is the final administrative decision, is subject to judicial review pursuant to California Code of Civil Procedure Sections 1094.5 and 1094.6. Any Petition for Writ of Mandate must be filed with the Court no later than the 90th day following the date on which this decision becomes final.

NOTES

1. You will need a building permit and must comply with the Monterey County Building Ordinance in every respect.

Additionally, the Zoning Ordinance provides that no building permit shall be issued, nor any use conducted, otherwise than in accordance with the conditions and terms of the permit granted or until ten days after the mailing of notice of the granting of the permit by the appropriate authority, or after granting of the permit by the Board of Supervisors in the event of appeal.

Do not start any construction or occupy any building until you have obtained the necessary permits and use clearances from Monterey County HCD-Planning and HCD-Building Services Department office in Salinas.

2. This permit expires 3 years after the above date of granting thereof unless construction or use is started within this period.

Form Rev. 1-27-2021

County of Monterey HCD Planning

DRAFT Conditions of Approval/Implementation Plan/Mitigation Monitoring and Reporting Plan

PLN190155

1. PD001 - SPECIFIC USES ONLY

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: This Use Permit (PLN190155) allows construction of a private road, development on slopes in excess of 25%, associated utilities to serve (4) future home sites and to partially clear Code Enforcement violation (21CE00499). The properties are located off of Vega Road, Royal Oaks (Assessor's Parcel Numbers 117-471-003-000, 117-471-004-000, 117-471-007-000, and 117-471-016-000), North County Area Plan. This permit was approved in accordance with County ordinances and land use regulations subject to the terms and conditions described in the project file. Neither the uses nor the construction allowed by this permit shall commence unless and until all of the conditions of this permit are met to the satisfaction of the Director of HCD - Planning. Any use or construction not in substantial conformance with the terms and conditions of this permit is a violation of County regulations and may result in modification or revocation of this permit and subsequent legal action. No use or construction other than that specified by this permit is allowed unless additional permits are approved by the appropriate authorities. To the extent that the County has delegated any condition compliance or mitigation monitoring to the Monterey County Water Resources Agency, the Water Resources Agency shall provide all information requested by the County and the County shall bear ultimate responsibility to ensure that conditions and mitigation measures are properly fulfilled. (HCD - Planning)

Compliance or Monitoring Action to be Performed: The Owner/Applicant shall adhere to conditions and uses specified in the permit on an on-going basis unless otherwise stated.

2. PD002 - NOTICE PERMIT APPROVAL

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: The applicant shall record a Permit Approval Notice. This notice shall state:
"A Use Permit (Resolution Number **) was approved by the Planning Commission for Assessor's Parcel Numbers 117-471-003-000, 117-471-004-000, 117-471-007-000, and 117-471-016-000 on March 13, 2024. The permit was granted subject to 8 conditions of approval which run with the land. A copy of the permit is on file with Monterey County HCD - Planning."

Proof of recordation of this notice shall be furnished to the Director of HCD - Planning prior to issuance of grading and building permits, Certificates of Compliance, or commencement of use, whichever occurs first and as applicable. (HCD - Planning)

Compliance or Monitoring Action to be Performed: Prior to the issuance of grading and building permits, certificates of compliance, or commencement of use, whichever occurs first and as applicable, the Owner/Applicant shall provide proof of recordation of this notice to the HCD - Planning.

3. PDSP001 - RESTORATION & MONITORING

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: The applicant shall submit a restoration plan for the areas of disturbance and affected by construction in accordance with the recommendations contained in the Oak Restoration Plan (LIB230067) to HCD-Planning for review and approval. The restoration plan shall include the following: use local plant sources for seed and container plant revegetation material, removal of exotic species, revegetation, success criteria, quarterly monitoring, establishment of a monitoring program to track the success of non-native vegetation control and establishment of native species, and establishment of an ongoing maintenance program for non-native plant control and other actions noted during monitoring. Quarterly monitoring of the restoration area will occur during the first year.

Compliance or Monitoring Action to be Performed: Prior to issuance of construction or grading permits from Building Services, the Owner/Applicant shall submit a restoration plan detailing the recommendations of LIB230067 and this condition to HCD-Planning for review and approval.

Prior to issuance of construction or grading permits from Building Services, the Owner/Applicant shall submit to HCD-Planning a copy of a contract between the owner/applicant and a qualified biologist indicating that the restoration plan and monitoring program will be implemented.

Prior to final inspection, the Project Biologist shall prepare and submit to HCD-Planning for review and approval, a report confirming that exotic species have been removed, and all replanting and revegetation activities have successfully occurred.

On an ongoing basis for the duration of the required monitoring period, quarterly reports shall be submitted to HCD-Planning for review and approval detailing compliance the approved restoration plan.

4. PD050 - RAPTOR/MIGRATORY BIRD NESTING

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: Any tree removal or construction activity that occurs during the typical bird nesting season (February 22-August 1), the County of Monterey shall require that the project applicant retain a County qualified biologist to perform a nest survey in order to determine if any active raptor or migratory bird nests occur within the project site or within 300 feet of proposed tree removal activity. During the typical nesting season, the survey shall be conducted no more than 30 days prior to ground disturbance or tree removal. If nesting birds are found on the project site, an appropriate buffer plan shall be established by the project biologist. (HCD – Planning)

Compliance or Monitoring Action to be Performed: No more than 30 days prior to ground disturbance or tree removal, the Owner/Applicant/Contractor shall submit to HCD-Planning a nest survey prepared by a County qualified biologist to determine if any active raptor or migratory bird nests occur within the project site or immediate vicinity.

5. PD004 - INDEMNIFICATION AGREEMENT

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: The property owner agrees as a condition and in consideration of the approval of this discretionary development permit that it will, pursuant to agreement and/or statutory provisions as applicable, including but not limited to Government Code Section 66474.9, defend, indemnify and hold harmless the County of Monterey or its agents, officers and employees from any claim, action or proceeding against the County or its agents, officers or employees to attack, set aside, void or annul this approval, which action is brought within the time period provided for under law, including but not limited to, Government Code Section 66499.37, as applicable. The property owner will reimburse the county for any court costs and attorney's fees which the County may be required by a court to pay as a result of such action. County may, at its sole discretion, participate in the defense of such action; but such participation shall not relieve applicant of his obligations under this condition. An agreement to this effect shall be recorded upon demand of County Counsel or concurrent with the issuance of building permits, use of the property, filing of the final map, whichever occurs first and as applicable. The County shall promptly notify the property owner of any such claim, action or proceeding and the County shall cooperate fully in the defense thereof. If the County fails to promptly notify the property owner of any such claim, action or proceeding or fails to cooperate fully in the defense thereof, the property owner shall not thereafter be responsible to defend, indemnify or hold the county harmless. (HCD - Planning)

Compliance or Monitoring Action to be Performed: Upon demand of County Counsel or concurrent with the issuance of building permits, use of the property, filing of the final/parcel map, whichever occurs first and as applicable.

Owner/Applicant/Agent shall submit signed and notarized Indemnification Agreement to the Director of HCD – Planning for review and signature by the County.

Proof of recordation of the Indemnification Agreement, as outlined, shall be submitted to HCD – Planning.

6. PD006(A) - CONDITION COMPLIANCE FEE

Responsible Department: Planning

Condition/Mitigation Monitoring Measure: The Owner/Applicant shall pay the Condition Compliance fee, as set forth in the fee schedule adopted by the Board of Supervisors, for the staff time required to satisfy conditions of approval. The fee in effect at the time of payment shall be paid prior to clearing any conditions of approval. (HCD - Planning)

Compliance or Monitoring Action to be Performed: Prior to clearance of conditions, the Owner/Applicant shall pay the Condition Compliance fee, as set forth in the fee schedule adopted by the Board of Supervisors.

7. PW0005 – DRIVEWAY IMPROVEMENTS

Responsible Department: Public Works

Condition/Mitigation Monitoring Measure: Construct driveway connection(s) to Vega Road. The design and construction is subject to the approval of the HCD -PWFP. Encroachment Permits are required for all work within the public right-of-way.

Compliance or Monitoring Action to be Performed: Owner/Applicant shall submit the design for review and approval of the HCD-PWFP, obtain an encroachment permit from the HCD -PWFP prior to issuance of building or grading permits, and construct and complete improvements prior to occupancy or commencement of use. Applicant is responsible to obtain all permits and environmental clearances.

8. CALIFORNIA CONSTRUCTION GENERAL PERMIT

Responsible Department: Environmental Services

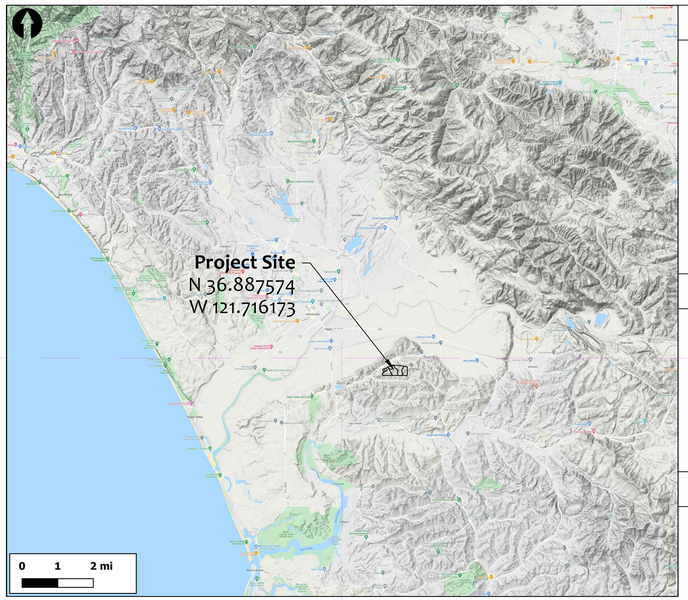
Condition/Mitigation Monitoring Measure: The applicant shall submit a Stormwater Pollution Prevention Plan (SWPPP) including the Waste Discharger Identification (WDID) number, to HCD-Environmental Services. In lieu of a SWPPP, a letter of exemption or erosivity waiver from the Central Coast Regional Water Quality Control Board may be provided. (HCD-Environmental Services)

Compliance or Monitoring Action to be Performed: Prior to issuance of any grading or construction permits, the applicant shall submit a SWPPP including the WDID number certifying the project is covered under the California Construction General Permit or a letter of exemption from the Central Coast Regional Water Quality Control Board.

VEGA ROAD PROPERTIES PROJECT
ROYAL OAKS, CA 95076

VEGA ROAD PROPERTIES ACCESS ROAD PROJECT

RESPONSES TO COMMENTS AUGUST 31, 2023



VICINITY MAP

SHEET INDEX

R-1 TITLE SHEET
R-2 SITE PLAN
R-3 VEGETATION MAP
R-4 EXISTING SLOPES
R-5 PROPOSED SLOPES

OWNER

ELLA INDUSTRIES, INC
608B MISSOURI ST.
SAN FRANCISCO, CA 94107
(925) 389-6074

APNS: 117471003; 117471004; 117471007; & 117471016

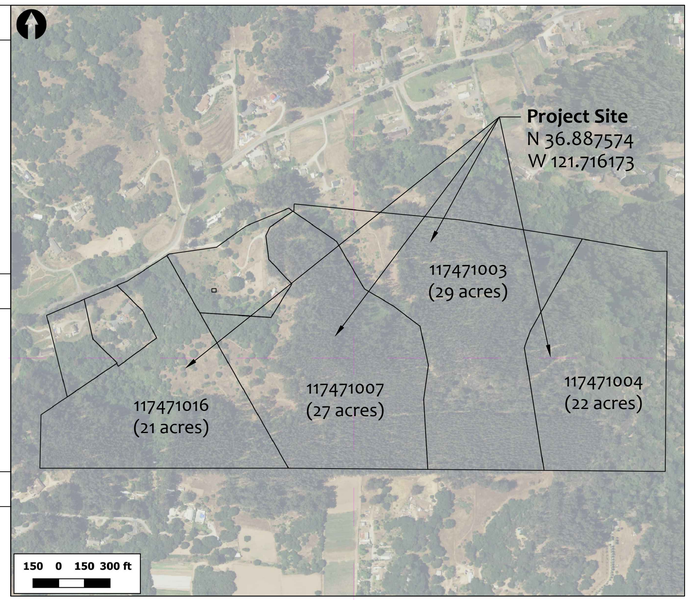
PROJECT OVERVIEW

Project Overview: The purpose of this is to construct an access road and trenching for future utility service to un-developed residential parcels (FUTURE PROJECT). The access road will be a private driveway to service the future construction of up to four (4) single family residences (FUTURE PROJECT). This project includes installation of utilities within the roadway (underground electrical, water line, communication conduit), and storm water drainage. New grading and associated paving for the access road will include required fire service access and turn-outs/arounds.

Earthwork Quantities: Cut: 3,000 CY Fill: 2,300 CY Disturbed Area: 6 AC Ponds: 3,400 CY

Note: Approximate earth quantities provided for permit valuation.

PLANS FOR PERMIT REVIEW ONLY, NOT FOR CONSTRUCTION.



SITE MAP

MARK	DESCRIPTION	DATE	APPR
1	RESPONSE TO COMMENTS	08/31/23	RS

PERMIT - NOT FOR CONSTRUCTION

REGISTERED PROFESSIONAL ENGINEER — ROBERT STORESUND — NO. 64473 — EXP. 06/30/2025 — CIVIL — STATE OF CALIFORNIA

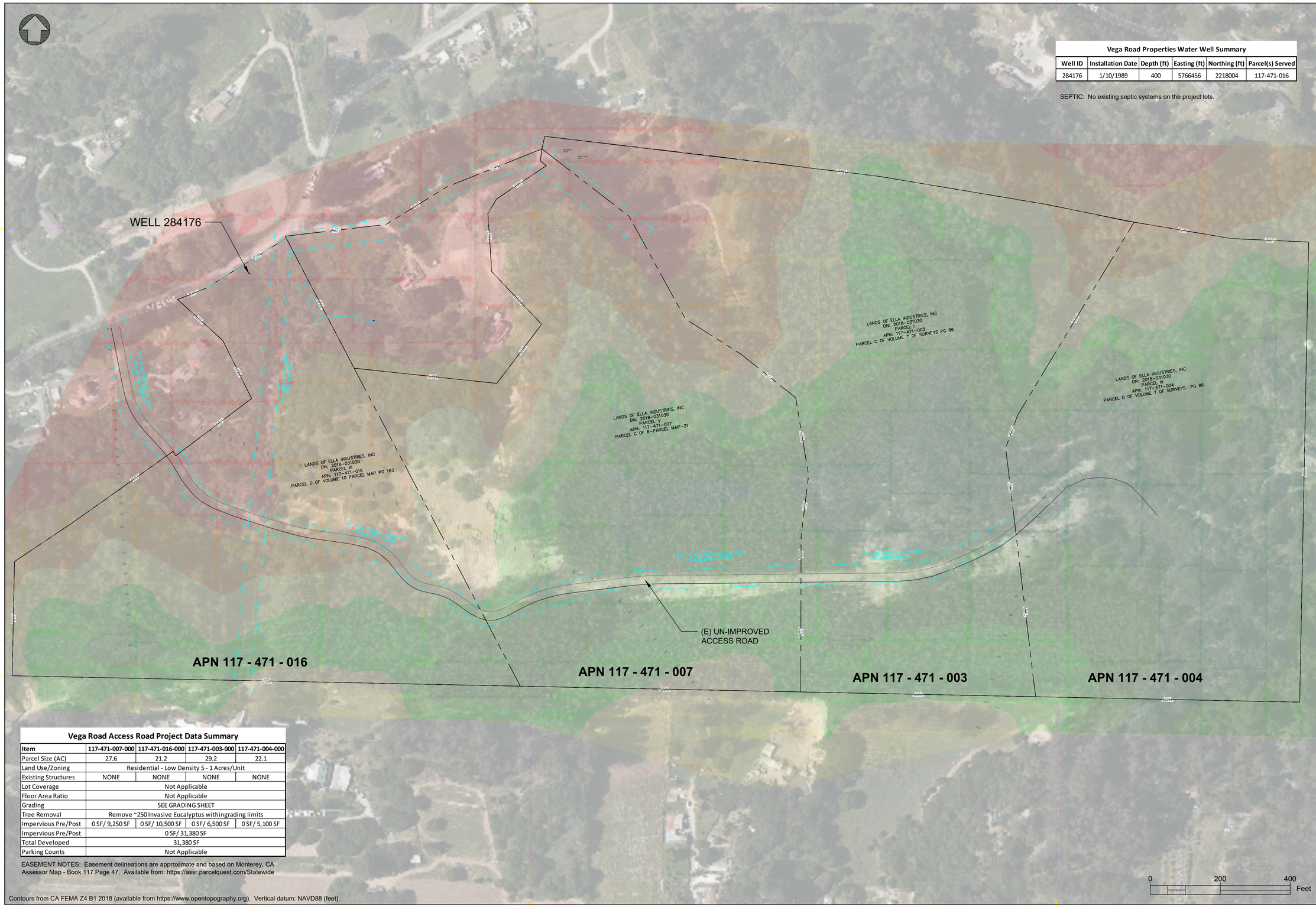
REGISTERED PROFESSIONAL ENGINEER — ROBERT STORESUND — NO. GE2855 — EXP. 06/30/2025 — GEOTECHNICAL — STATE OF CALIFORNIA

DESIGNED BY:
DWN BY: CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
545 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

TITLE SHEET
VEGA ROAD PROPERTIES PROJECT
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
R-1
SHEET 1 OF 5



Vega Road Properties Water Well Summary

Well ID	Installation Date	Depth (ft)	Easting (ft)	Northing (ft)	Parcel(s) Served
284176	1/10/1989	400	5766456	2218004	117-471-016

SEPTIC: No existing septic systems on the project lots.

Vega Road Access Road Project Data Summary

Item	117-471-007-000	117-471-016-000	117-471-003-000	117-471-004-000
Parcel Size (AC)	27.6	21.2	29.2	22.1
Land Use/Zoning	Residential - Low Density 5 - 1 Acres/Unit			
Existing Structures	NONE	NONE	NONE	NONE
Lot Coverage	Not Applicable			
Floor Area Ratio	Not Applicable			
Grading	SEE GRADING SHEET			
Tree Removal	Remove ~250 Invasive Eucalyptus withingrading limits			
Impervious Pre/Post	0 SF/ 9,250 SF	0 SF/ 10,500 SF	0 SF/ 6,500 SF	0 SF/ 5,100 SF
Impervious Pre/Post	0 SF/ 31,380 SF			
Total Developed	31,380 SF			
Parking Counts	Not Applicable			

EASEMENT NOTES: Easement delineations are approximate and based on Monterey, CA Assessor Map - Book 117 Page 47. Available from: https://assr.parcelquest.com/Statewide

Contours from CA FEMA Z4 B1 2018 (available from https://www.opentopography.org). Vertical datum: NAVD88 (feet).

MARK	DESCRIPTION	DATE	APPR
1	RESPONSE TO COMMENTS	06/30/2025	RS

PERMIT - NOT FOR CONSTRUCTION

REGISTERED PROFESSIONAL ENGINEER
JOHN E. STORESUND
No. 64473
Exp 06/30/2025
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
JOHN E. STORESUND
No. GE2855
Exp 06/30/2025
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
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DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES
0 1 2 3

Storesund Consulting

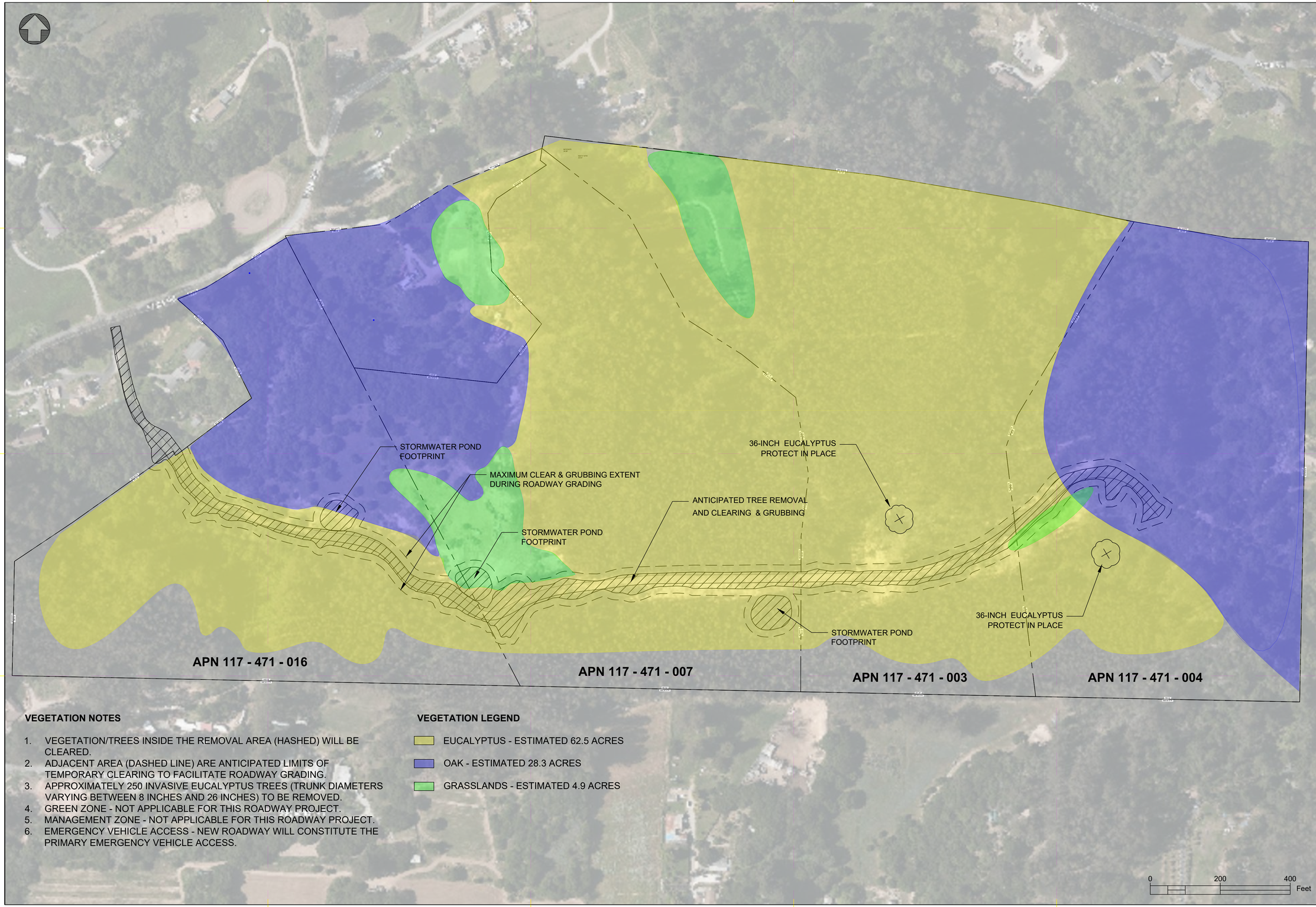
STORESUND CONSULTING
47 JAMISON COURT
KENSINGTON, CA 94707
(510) 526-5849

SITE PLAN

VEGA ROAD PROPERTIES PROJECT
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
R-2
SHEET 2 OF 5

1884



VEGETATION NOTES

1. VEGETATION/TREES INSIDE THE REMOVAL AREA (HASHED) WILL BE CLEARED.
2. ADJACENT AREA (DASHED LINE) ARE ANTICIPATED LIMITS OF TEMPORARY CLEARING TO FACILITATE ROADWAY GRADING.
3. APPROXIMATELY 250 INVASIVE EUCALYPTUS TREES (TRUNK DIAMETERS VARYING BETWEEN 8 INCHES AND 26 INCHES) TO BE REMOVED.
4. GREEN ZONE - NOT APPLICABLE FOR THIS ROADWAY PROJECT.
5. MANAGEMENT ZONE - NOT APPLICABLE FOR THIS ROADWAY PROJECT.
6. EMERGENCY VEHICLE ACCESS - NEW ROADWAY WILL CONSTITUTE THE PRIMARY EMERGENCY VEHICLE ACCESS.

VEGETATION LEGEND

- EUCALYPTUS - ESTIMATED 62.5 ACRES
- OAK - ESTIMATED 28.3 ACRES
- GRASSLANDS - ESTIMATED 4.9 ACRES

MARK	DESCRIPTION	DATE	APPR
1	RESPONSE TO COMMENTS		RS

PERMIT - NOT FOR CONSTRUCTION

REGISTERED PROFESSIONAL ENGINEER — ROBERT STORESUND — NO. 64473 — EXP 06/30/2025 — CIVIL — STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER — ROBERT STORESUND — NO. GE2855 — EXP 06/30/2025 — GEOTECHNICAL — STATE OF CALIFORNIA

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DATE:
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CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
1 LANSDOWNE
KENSINGTON, CA 94707
(510) 526-5849

VEGETATION

VEGA ROAD PROPERTIES PROJECT
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
R-3
SHEET 3 OF 5

1885

Slopes Table					
Number	Minimum Slope	Maximum Slope	Color	Area (SF)	% Area
1	0.00%	25.00%		1871265	42.2
2	25.00%	50.00%		2216639	50.0
3	50.00%	Vertical		346885	7.8

VEGA ROAD

APN 117 - 471 - 016

APN 117 - 471 - 007

APN 117 - 471 - 003

APN 117 - 471 - 004

0 200 400 Feet

MARK	DESCRIPTION	DATE	APPR.
1	RESPONSE TO COMMENTS	06/30/25	RS

PERMIT - NOT FOR CONSTRUCTION

REGISTERED PROFESSIONAL ENGINEER ROBERT STORESUND No. 64473 EXP. 06/30/2025 CIVIL STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER ROBERT STORESUND No. GE2855 EXP. 06/30/2025 GEOTECHNICAL STATE OF CALIFORNIA

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FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
16 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

EXISTING SLOPES

VEGA ROAD PROPERTIES PROJECT
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
R-4
SHEET 4 OF 5

1886

Utility Trench Slopes Table					
Number	Minimum Slope	Maximum Slope	Color	Area (SF)	% Area
1	6%	25%		1151	37.4
2	25%	50%		689	62.6
			TOTAL	1840	

Roadway Grading Slopes Table					
Number	Minimum Slope	Maximum Slope	Color	Area (SF)	% Area
1	0.00%	25.00%		212863	68.1
2	25.00%	50.00%		89617	28.7
3	50.00%	100.00%		10182	3.3

*TOTAL DISTURBED AREA FOR ROADWAY GRADING: 312,700 SF

62.6

VEGA ROAD

PROPOSED ROADWAY GRADING LIMITS

PROPOSED ROADWAY GRADING LIMITS

PROPOSED ROADWAY GRADING LIMITS

PROPOSED ROADWAY GRADING LIMITS

APN 117 - 471 - 016

APN 117 - 471 - 007

APN 117 - 471 - 003

APN 117 - 471 - 004

0 200 400 Feet

MARK	DESCRIPTION	DATE	APPR
2	RESUBMITTAL	04/18/2023	RS
1	RESPONSE TO COMMENTS		RS

PERMIT - NOT FOR CONSTRUCTION

REGISTERED PROFESSIONAL ENGINEER RICHARD STORESUND No. 64473 EXP. 06/30/2025 CIVIL STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER RICHARD STORESUND No. GE2855 EXP. 06/30/2025 GEOTECHNICAL STATE OF CALIFORNIA

DESIGNED BY:
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FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
15 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

PROPOSED SLOPES

VEGA ROAD PROPERTIES PROJECT
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
R-5
SHEET 5 OF 5

Exhibit B

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Ono Consulting

International Society of Arboriculture
Certified Arborist #WE-0536A
Board Certified Master Arborist #WE-9388B
ASCA Registered Consulting Arborist #744
Society of American Foresters Professional Members
311 Forest Ave, Box 14
Pacific Grove CA, 93950
Telephone (831) 373-7086

March 8, 2022

Ella Industries Inc
C/O Casey Marsh
608 B Missouri St
San Francisco CA 94107

RE: Oak Restoration and Forest Management Plan – 146 Vega Road
APNs: 117-471-003-000, 117-471-004-000, 117-471-006-000. 117-471-007-000, and 117-471-016-000

Mr. Marsh;

We were Contacted by Mr. Rune Storesund who requested that we visit the above-referenced property (located at 146 Vega Road, Royal Oaks, CA 95076) to observe the site and forested conditions. Development in the form of a new road and the installation of a water system to serve five (5) future homes is proposed under county permit PLN190155 and construction are underway. During the County's inspection of the property, they raised concerns about tree removal on-site, specifically Heritage Eucalyptus and Monterey pine trees. We were asked to prepare a report addressing the removal of eucalyptus trees and provide recommendations to help transition the former eucalyptus plantation back to natural oak woodland. The following report contains our observations and recommended plan of action.

Sincerely,

Frank Ono
Certified Arborist #WE-0536A
ISA Tree Risk Assessment Qualified
Society of American Foresters # 048004

Justin Ono
ISA Board Certified Master Arborist #WE-9388B
ASCA Registered Consulting Arborist #744
ISA Tree Risk Assessment Qualified

Oak Restoration/
Forest Management Plan
146 Vega Road

Prepared by Ono Consulting
311 Forest Ave, Box 14
Pacific Grove, CA 93950

ASSIGNMENT/SCOPE OF WORK

I was asked to assess a stand of Eucalyptus trees located across the four parcels that comprise 146 Vega Road, Royal Oaks, CA 95076. The assignment is to determine a course of action to remove the existing Eucalyptus trees planted in a row plantation layout and transition the properties back to a native oak woodland environment.

LIMITATIONS

This assignment is limited to the review of surveys submitted to me by dated May 9, 2019, to assess the proposed road and onsite vegetation conditions. The assessment has been made of these plans specifically and no other plans were reviewed. Ono Consulting and its representatives are not designers, engineers, or surveyors and this report is explicitly based on the plans given to us. Only minor grading and erosion details are discussed in this report as it relates to tree health. It is not the intent of this report to be a monetary valuation of the trees or provide a risk assessment for any tree on this parcel, as any tree can fail at any time. No clinical diagnosis was performed on any pest or pathogen that may or may not be present. In addition to an inspection of the property, Ono Consulting relied on information provided in the preparation of this report (such as surveyed tree sizes, property boundaries, and property ownership) and must reasonably rely on the accuracy of the information provided. Ono Consulting shall not be responsible for another's means, methods, techniques, schedules, sequence or' procedures, or for contractor safety or any other related programs; or another's failure to complete the work per the plans and specifications.

BACKGROUND

We were contacted by Mr. Storesund after he was contracted by the owners to help with a grading permit for the properties. During the initial permit fact-finding process, the County of Monterey observed recent tree removal and related activities adjacent to the road being developed on the property. The county asked for a forest restoration/management plan to identify trees being removed and to ensure protected trees were not removed without county permits. Protected trees in the North County Land Use Plan include Coast live oak (*Quercus agrifolia*), Valley oak (*Quercus lobata*), Willows (*Salix spp.*), Black cottonwood (*Populus trichocarpa*), Fremont cottonwood (*Populus fremontii*), California sycamore (*Platanus racemosa*), Toyon (*Heteromeles arbutifolia*), Chinquapin (*Castanea pumila*), Madrone (*Arbutus menziesii*), California buckeye (*Aesculus californica*), California box elder (*Acer negundo*), and Bigleaf maple (*Acer macrophyllum*). Monterey pines (*Pinus radiata*) and Bluegum Eucalyptus (*Eucalyptus globulus*) trees over 36-inches in diameter are also considered Landmark trees are protected by the county. We have been requested to prepare a forest restoration/management plan for the identified removed trees. The plan is prepared to utilize strategies to bring the site back to pre-plantation levels of native tree coverage, and a more natural and native landscape.

SITE CONDITIONS

1) APNs: 117-471-003-000, 117-471-004-000, 117-471-006-000. 117-471-007-000, and 117-471-016-000.

2) Parcel sizes: 29.2, 22.08, 5.86, 27.58, and 21.23 Acres.

3) Existing Land Use: The parcels are zoned for low-density residential use.

4) Slope: The parcels are located along a ridge. Slopes range from 2 to over 25%.

5) Soils: The parcel is located on Arnold loamy sand and Arnold-Santa Ynez complex soil about 65-inches deep. Weathered sandstone bedrock is found generally at a depth of 48-79-inches. Runoff is low on the Arnold series soils and very high in the Santa Ynez soils. Erosion hazard is low to moderate. The majority of the parcels sit on Arnold loamy sand with a small finger in the southeast corner of the properties of Arnold-Santa Ynez complex.

6) Current Site Conditions and Former Woodland Nature: The area and surrounding landscape was historically managed as a rural residential community comprised of scattered oak woodlands with small farming and livestock production. The native vegetation is of an oak woodland type with scattered Coast live oak trees with an understory of native shrubs such as Poison oak (*Toxicodendron diversilobum*), Sticky Monkey flower (*Mimulus aurantiacus*), and Manzanita (*Arctostaphylos spp*). The area in and around the site is heavily populated by the introduced blue gum eucalyptus trees (*Eucalyptus globulus*) with invasive understory weeds including, Pampas grass (*Cortaderia selloana*), and Himalayan blackberry (*Rubus armeniacus*). The proposed road construction is currently underway, and several smaller eucalyptus trees have been removed and their root balls dug up and masticated.

OBSERVATIONS

The following are observations taken on site:

- The site was planted as a Eucalyptus plantation as was evidenced by uniform row crop planting 10 to 20-feet on center. Over 60% of the parcels' acreage is taken up by eucalyptus planting. In the densest areas, 200-400 trees per acre were calculated.
- The existing Eucalyptus trees appear to have been harvested two to three times with multi-clustered stems ranging from 10-24-inches in diameter.
- Trees removed for roadway construction are all Eucalyptus under 30-inches in diameter.
- Very little native vegetation was observed around the planted eucalyptus trees due to Allelopathy.
- Along the road, in parcel 117-471-003-000 there is a small stand of Coast live oak trees in poor condition.
- Eucalyptus logs, both large and small cut pieces were left on site in piles.
- Only two (2) heritage Eucalyptus trees (greater than 36-inches in diameter) were observed on the sites. One in the clearing in parcel 117-471-003-000 upslope from the declining oak stand, and one off the road in parcel 117-471-004-000 where the landscape transitions from eucalyptus to more native plantings.

DISCUSSION

The site was evaluated by looking at specific characteristics and establishing a benchmark to formulate an Oak Woodland site restoration plan as follows:

Restoration Strategy

To restore the property as much to a healthy and functioning Oak Woodland as possible, the following actions must be taken. The first and most important goal is to remove and eradicate the existing Eucalyptus plantation while retaining enough plant coverage for soil stability. The second major goal is to reestablish the Oak canopy cover to promote native plant growth creating a condition similar to the pre-Eucalyptus woodlands. These goals can be accomplished through the following:

1. Remove Eucalyptus stump sprouts and treat with a woody herbicide to reduce the regrowth and allow space for planting new trees.
2. Eucalyptus stumps should be left in a mosaic pattern until their removal is necessary for development and/or proper native plant cover has been established to reduce the risk of erosion.
3. If Eucalyptus stumps are to be mechanically removed, a soil or grading erosion specialist will need to be consulted to avoid the risk of erosion.
4. The small number of landmark Eucalyptus trees observed can remain on site as they are outside of development areas. If the trees are proposed to be removed later, oak reforestation efforts will mitigate the removal of the landmark Eucalyptus.
5. Re-establish appropriate oak species in areas that did or could have supported oak woodlands previously and are now capable of supporting this vegetation type.
6. Manage remnant oak woodlands and restored stands to permit natural regeneration and maximize the cover and dominance of indigenous plant species while minimizing the cover of nonindigenous species and weeds outside of scenic easements.
7. Rehabilitate vigorously sprouting stumps and naturally recruited oak seedlings by pruning them to re-establish dominant canopies and regain proper structure through crown restoration.

RESTORATION PLAN

Restoration Action Plan

The following steps need to be implemented immediately to have success in site restoration;

1. The existing Eucalyptus trees will need to be removed or cut into logs and stacked, allowing growing space for replanted oak trees and reducing fuel load on the ground.
2. Downed Eucalyptus bark and leaves need to be removed to open up growing space and reduce fine fuels.
3. The Himalayan Blackberry and other invasive plants should be mowed and controlled to allow for a minimum of competition for the emerging oak seedlings.
4. Re-sprouting Eucalyptus stumps shall be treated with herbicide to prevent any sprouting of new trees, with stumps flush cut and left in the ground for slope stabilization.

5. Existing oak seedling/sapling identification should occur after the Eucalyptus logs are removed in case smaller seedlings are damaged during the tree work and mowing.
6. Whether trees are transplanted on-site or planted from nursery stock individual seedlings should not be planted within 10 feet of other seedlings, sprouted stumps, or mature trees.
7. Seedling/saplings will likely need to be hand-watered during the spring and summer months after planting, particularly if dry conditions prevail. Drip irrigation on an automatic timer is highly advised. Soils should be damp at the time of planting and during the initial establishment period for the juvenile oak trees.

Planting Guidelines

Indigenous acorns from the properties should be collected in the Fall months when the nuts are mature. Seedlings can be propagated on-site, or by a local native plant nursery for the landowners. Acorns should be started in tall 1-gallon tree pots to promote root growth and viable seedlings should be out-planted during fall months before the onset of winter rain. Seedling development could take more than one growing season before the juvenile oaks are ready to be out planted. Ideally, acorns will be collected in Fall 2018 and seedlings out planted in late Fall 2019 or Winter 2020.

Individual seedlings should not be planted within 10 feet of other seedlings or mature oak trees. To recreate the pre-disturbance woodland the seedlings should be planted at a spacing of 15 – 25-feet on center to establish a tree count of 70-190- trees per acre to account for mortality and future thinning. Trees can be planted in clusters of 2-3 to mimic the natural multi-stemmed clusters of the oaks in the native region. A Certified Arborist or qualified forester should supervise the placement of seedling trees for the landowners.

Tree Shelters for Seedlings

Seedlings should be planted in tree shelter cages to deter animal browsing, and each seedling should be marked and numbered for easy identification. A regular maintenance and monitoring program should be implemented by the landowners to maintain the area around each juvenile oak in a weed-free condition. Invasive annual grasses and thistles should be removed from the areas directly adjacent (within five to six feet) around newly planted seedlings.

Success Criteria and Monitoring Schedule

Seedlings should be monitored regularly by the landowners and any signs of herbivory or weakness addressed immediately. A qualified Forester or Arborist should inspect the planted or regenerated trees annually after the seedlings are installed to ensure trees survival. Trees that have died should be replaced up to a threshold agreed upon by the forester and the landowners.

To help ensure the survivability and proper growth of planted replacement trees, a qualified professional (Monterey County approved Certified Arborist or forester) should assess the following

- Tree health and growth rates of new or relocated planting.
- Trees suffering poor growth rates or declining health are to be identified and documented as to the reason it was not successful.
- Invigoration Treatments will be recommended and implemented if deemed feasible.
- Dead trees or trees identified in an irreversible state of decline will be replaced after a written recommendation is made by a qualified forester or Certified Arborist identifying the type and location of replacement.

Tree Removal and Bird Habitat

During Eucalyptus tree removal, the contractor shall verify absence of active animal or bird nesting sites prior to any work. If any active animal or bird nesting sites are found prior to tree removal, work shall be stopped until a qualified biologist is consulted for further recommendations.

Tree Pruning

Future pruning of county protected trees shall conform to the following standards:

- Clear the crown of diseased, crossing, weak, and dead wood to a minimum size of 1-1/2 inch in diameter;
- Remove stubs, cutting outside the wound wood tissue that has formed around the branch;
- Interior branches shall not be stripped out.
- Reduce end weight on heavy, horizontal branches by selectively removing small-diameter branches, no greater than 3 inches, near the ends of the scaffolds. In some cases, larger diameters may be removed depending on the situation (where critical for safety).
- Pruning cuts larger than 4 inches in diameter, except for deadwood, shall be avoided, unless deemed crucial for safety (broken, cracked, crossing, rubbing, etc.).
- Pruning cuts that expose heartwood shall be avoided whenever possible.
- Pruning shall not be performed during periods of flight of adult boring insects because fresh wounds attract pests (generally spring). Pruning shall be performed only when the danger of infestation has passed.

- All pruning shall be performed by a qualified arborist or under the supervision of an ISA Certified Arborist or Tree Worker. Arborists are required to have a State of California Contractors License for Tree Service (C-61/D49) and provide proof of worker's compensation and general liability insurance.
- All pruning shall be per the Tree Pruning Guidelines (International Society of Arboriculture) and/or the ANSI A300 Pruning Standard (American National Standard for Tree Care Operations) and adhere to the most recent edition of ANSI Z133.1.
- No more than 20 percent of live foliage shall be removed from the trees.
- Brush shall be chipped, and chips shall be spread underneath trees within the tree protection zone to a maximum depth of 6 inches, leaving the trunk clear of mulch.

Fire Defensible Space (PRC 4291 Amended January 1, 2021)

California's Department of Forestry and Fire Protection (CalFire) has instituted a set of rules and guidelines for vegetation management and fire safety for homes in the wildland-urban interface (WUI). These rules have been adopted to reduce the fuels around homes and allow firefighters a better chance to combat the increasing wildfires that have been occurring in California. Although there are no structures currently planned for the parcels at 146 Vega Road, fuel management procedures should be taken in accordance to California Public Resource Code to ensure proper fire defensibility of the sites. The law (Public Resource Code 4291) is as follows.

(a) A person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material, shall at all times do all of the following:

(1) (A) Maintain defensible space of 100 feet from each side and from the front and rear of the structure, but not beyond the property line, except as provided in subparagraph (B). The amount of fuel modification necessary shall consider the flammability of the structure as affected by building material, building standards, location, and type of vegetation. Fuels shall be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. This subparagraph does not apply to single specimens of trees or other vegetation that are well-pruned and maintained so as to effectively manage fuels and not form a means of rapidly transmitting fire from other nearby vegetation to a structure or from a structure to other nearby vegetation. The intensity of fuels management may vary within the 100-foot perimeter of the structure, with more intense fuel reductions being utilized between 5 and 30 feet around the structure, and an ember-resistant zone being required within 5 feet of the structure, based on regulations promulgated by the board, in consultation with the department, to consider the elimination of materials in the ember-resistant zone that would likely be ignited by embers. The promulgation of these regulations by the board is contingent upon an appropriation by the Legislature in the annual Budget Act or another statute for this purpose. Consistent with fuels management objectives, steps should be taken to minimize erosion. For the purposes of this subparagraph, "fuel" means any combustible material, including petroleum-based products and wildland fuels.

(B) A greater distance than that required under subparagraph (A) may be required by state law, local ordinance, rule, or regulation. Clearance beyond the property line may only be required if the state law, local ordinance, rule, or regulation includes findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of

wildfire to the structure. Clearance on adjacent property shall only be conducted following written consent by the adjacent landowner.

(C) An insurance company that insures an occupied dwelling or occupied structure may require a greater distance than that required under subparagraph (A) if a fire expert, designated by the director, provides findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. The greater distance may not be beyond the property line unless allowed by state law, local ordinance, rule, or regulation.

(2) Remove that portion of a tree that extends within 10 feet of the outlet of a chimney or stovepipe.

(3) Maintain a tree, shrub, or other plant adjacent to or overhanging a building free of dead or dying wood.

(4) Maintain the roof of a structure free of leaves, needles, or other vegetative materials.

(5) Before constructing a new building or structure or rebuilding a building or structure damaged by a fire in an area subject to this section, the construction or rebuilding of which requires a building permit, the owner shall obtain a certification from the local building official that the dwelling or structure, as proposed to be built, complies with all applicable state and local building standards, including those described in subdivision (b) of Section 51189 of the Government Code, and shall provide a copy of the certification, upon request, to the insurer providing course of construction insurance coverage for the building or structure. Upon completion of the construction or rebuilding, the owner shall obtain from the local building official, a copy of the final inspection report that demonstrates that the dwelling or structure was constructed in compliance with all applicable state and local building standards, including those described in subdivision (b) of Section 51189 of the Government Code, and shall provide a copy of the report, upon request, to the property insurance carrier that insures the dwelling or structure.

(b) A person is not required under this section to manage fuels on land if that person does not have the legal right to manage fuels, nor is a person required to enter upon or to alter property that is owned by any other person without the consent of the owner of the property.

(c) (1) Except as provided in Section 18930 of the Health and Safety Code, the director may adopt regulations exempting a structure with an exterior constructed entirely of nonflammable materials, or, conditioned upon the contents and composition of the structure, the director may vary the requirements respecting the removing or clearing away of flammable vegetation or other combustible growth with respect to the area surrounding those structures.

(2) An exemption or variance under paragraph (1) shall not apply unless and until the occupant of the structure, or if there is not an occupant, the owner of the structure, files with the department, in a form as the director shall prescribe, a written consent to the inspection of the interior and contents of the structure to ascertain whether this section and the regulations adopted under this section are complied with at all times.

(d) The director may authorize the removal of vegetation that is not consistent with the standards of this section. The director may prescribe a procedure for the removal of that vegetation and make the expense a lien upon the building, structure, or grounds, in the same manner that is applicable to a legislative body under Section 51186 of the Government Code.

(e) (1) The board, in consultation with the department, shall develop, periodically update, and post on its internet website a guidance document on fuels management pursuant to this chapter. The guidance document shall include, but not be limited to, regionally appropriate vegetation

management suggestions that preserve and restore native species that are fire resistant or drought tolerant, or both, minimize erosion, minimize water consumption, and permit trees near homes for shade, aesthetics, and habitat; and suggestions to minimize or eliminate the risk of flammability of nonvegetative sources of combustion such as woodpiles, propane tanks, decks, and outdoor lawn furniture.

(2) On or before January 1, 2023, the board, in consultation with the department, shall update the guidance document to include suggestions for creating an ember-resistant zone within five feet of a structure, based on regulations promulgated by the board, in consultation with the department, to consider the elimination of materials in the ember-resistant zone that would likely be ignited by embers. The implementation of this paragraph is contingent upon an appropriation by the Legislature in the annual Budget Act or another statute for this purpose.

(f) (1) The department shall do both of the following:

(A) Recommend to the board the types of vegetation or fuel that are to be excluded from an ember-resistant zone based on the probability that vegetation and fuel will lead to ignition by ember of a structure as a part of the update to the guidance document pursuant to paragraph (2) of subdivision (e).

(B) Make reasonable efforts to provide notice to affected residents describing the requirements added by the amendments to paragraph (1) of subdivision (a) made in Assembly Bill 3074 of the 2019–20 Regular Session before the imposition of penalties for violating those requirements.

(2) The implementation of this subdivision is contingent upon an appropriation by the Legislature in the annual Budget Act or another statute for this purpose.

(g) (1) The requirement for an ember-resistant zone pursuant to paragraph (1) of subdivision (a) shall not take effect for new structures until the board updates the regulations, pursuant to paragraph (1) of subdivision (a), and the guidance document, pursuant to paragraph (2) of subdivision (e).

(2) The requirement for an ember-resistant zone pursuant to paragraph (1) of subdivision (a) shall take effect for existing structures one year after the effective date for the new structures.

(h) The department shall not change defensible space inspection practices and forms or enforcement to implement the requirement for an ember-resistant zone until the director makes a written finding, which the director shall post on the department's internet website, that the Legislature has appropriated sufficient resources to do so.

(i) For purposes of this section, a structure for the purpose of an ember-resistant zone shall include any attached deck. This section does not limit the authority of the board or the department to require the removal of fuel or vegetation on top of or underneath a deck pursuant to this section.

(j) As used in this section, "person" means a private individual, organization, partnership, limited liability company, or corporation.

Detailed descriptions of the firebreaks described in section (A) and (B) of Public Resource Code 4291. These spacings are to be used in and around home sites.

Zone 1

Zone 1 extends 30 feet out from buildings, structures, decks, etc.

- Maintain a non-combustible zone 0-5 feet from structures.
- Remove all dead plants, grass and weeds (vegetation).
- Remove dead or dry leaves and pine needles from your yard, roof and rain gutters.
- Trim trees regularly to keep branches a minimum of 10 feet from other trees.
- Remove branches that hang over your roof and keep dead branches 10 feet away from your chimney.
- Relocate wood piles into Zone 2.
- Remove or prune flammable plants and shrubs near windows.
- Remove vegetation and items that could catch fire from around and under decks.
- Create a separation between trees, shrubs and items that could catch fire, such as patio furniture, wood piles, swing sets, etc.

Zone 2

Zone 2 extends 100 feet out from buildings, structures, decks, etc.

- Cut or mow annual grass down to a maximum height of 4 inches.
- Create horizontal spacing between shrubs and trees.
- Create vertical spacing between grass, shrubs and trees.
- Remove all dead trees.
- Remove fallen leaves, needles, twigs, bark, cones, and small branches. However, they may be permitted to a depth of 3 inches.

Thank you and please feel free to contact us if you have any questions.

Sincerely,

Frank Ono
Certified Arborist #WE-0536A
ISA Tree Risk Assessment Qualified
Society of American Foresters # 048004

Justin Ono
ISA Board Certified Master Arborist #WE-9388B
ASCA Registered Consulting Arborist #744
ISA Tree Risk Assessment Qualified

PHOTOGRAPHS

Evenly spaced Eucalyptus stumps adjacent to roadwork.

One of the larger stems observed removed. Approximately 22-inches.

Eucalyptus trees were planted in rows 10-feet on center.

Previous stumps have been dug up and masticated.

A small number of existing oaks are growing in a small island next to the road in parcels 007 and 003.

Large Landmark Eucalyptus can be left on site or removed if warranted by new development.

There are several smaller (< 36”) Monterey pine trees in the eastern section of the lots.

Exhibit C

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Storesund Consulting
154 Lawson Road, Kensington CA 94707
510-225-5389 (cell) email: rune@storesundconsulting.com

April 25, 2022

Ella Industries
608-B Missouri Street
San Francisco, CA 94107

Attention: Mr. Timothy Moore

Re: Vega Road Project Geotechnical Evaluation

Dear Mr. Moore:

This letter provides an updated geotechnical evaluation of APNS: 117471003; 117471004; 117471007; & 117471016. We performed several site visits (October 29, 2021; November 11, 2021; and January 16, 2022) to evaluate onsite conditions and reviewed a previous report by Mr. Charles A. Fisher, titled "Geologic Investigation and Report, APN 117-471-3 thru 7, 16, Monterey County, California (Prunedale area) dated July 24, 1988.

Project Overview

The proposed project is located (Figure 1, Figure 2) in Royal Oaks, California (36.887574N; 121.716173W), south of the Pajaro River. The anticipated work consists of enhancing an existing jeep trail to a paved private hillside road. This letter addresses design considerations for roadway grading and installation of subsurface utilities.

Geologic Setting

Fisher describes the geology as a geologically young Aromas sands (Qa) with surficial deposits above and adjacent to the sands consisting of a loose colluvium consisting of fine tan-inorganic-faceted sands and silts. USDA soil survey maps (Figure 3) identify the parcels as situated within Arnold loam sands and silts with a low runoff potential when thoroughly wet and water is transmitted freely through the soil. Figure 4 shows a geologic map of the Monterey Bay region. It also maps the project site as situated within the Aromas Sand (Qar) formation. No active faulting is mapped at the site, but the San Andreas Fault is situated approximately 4 miles to the East and the Vergeles Fault approximately 3000 feet northeast.

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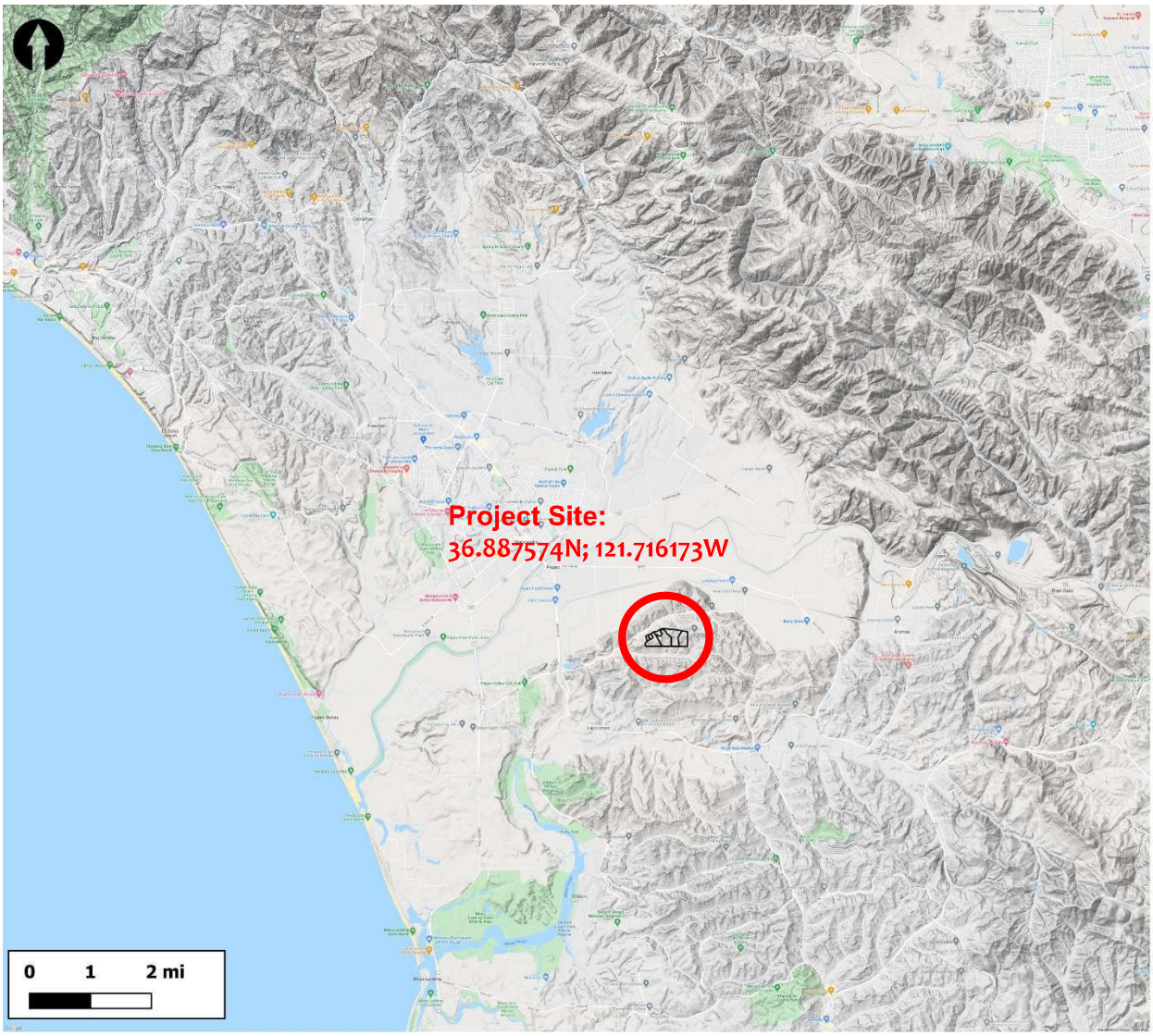

Figure 1: Vicinity map showing development location in Royal Oaks, California.

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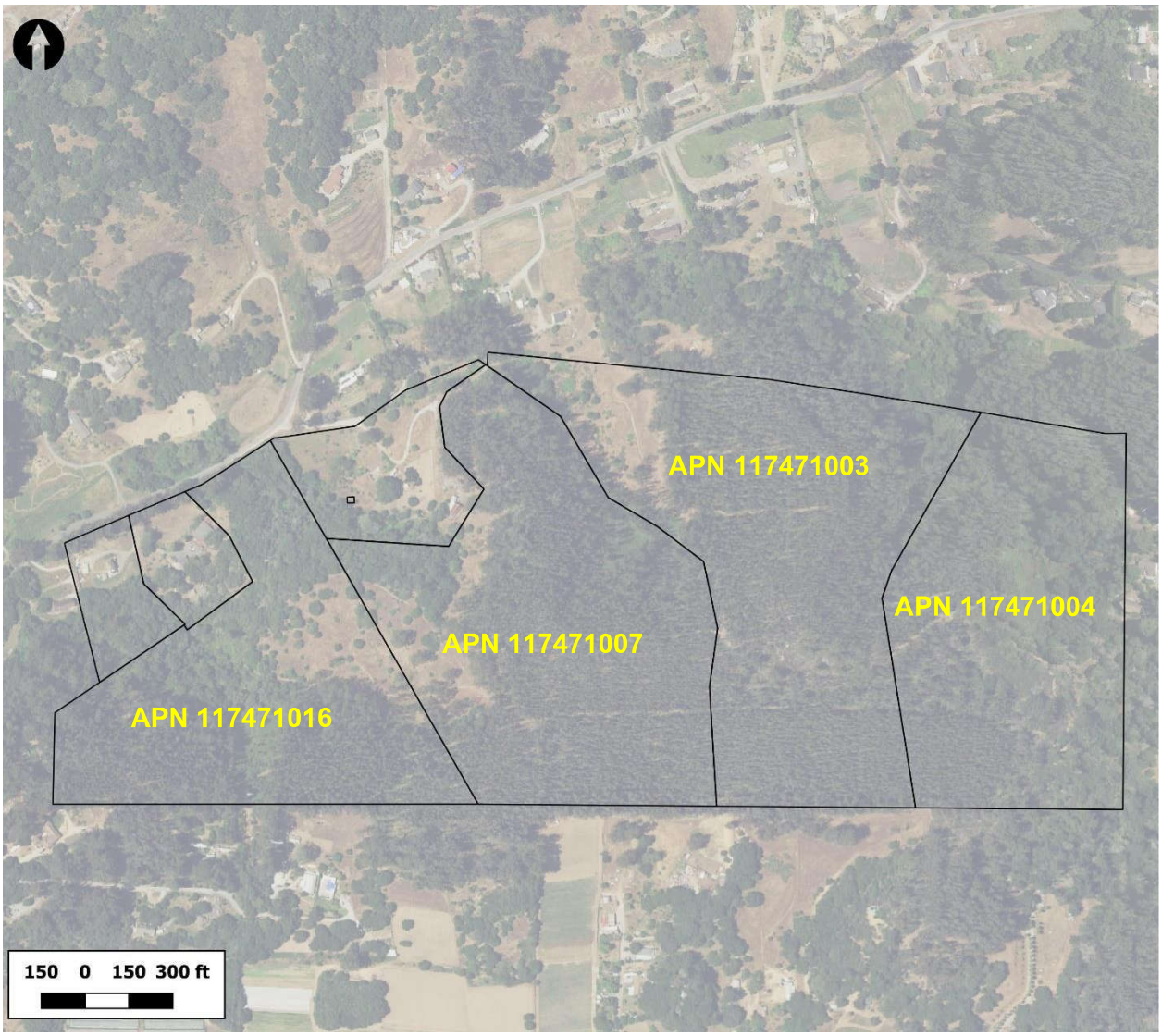

Figure 2: Site plan showing location of four project parcels.

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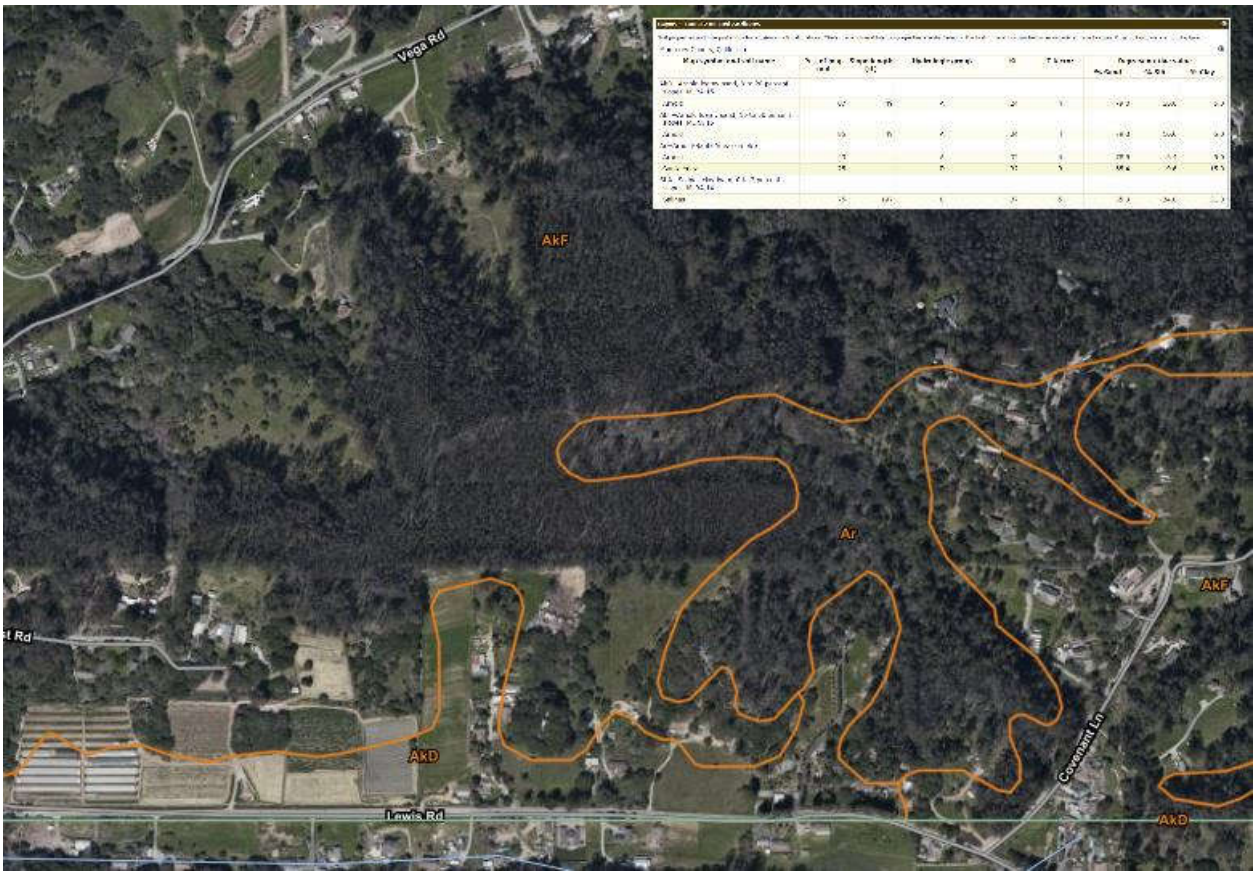

Figure 3: USDA Soil Survey Map denoting predominance of Arnold loamy sand (AkF).

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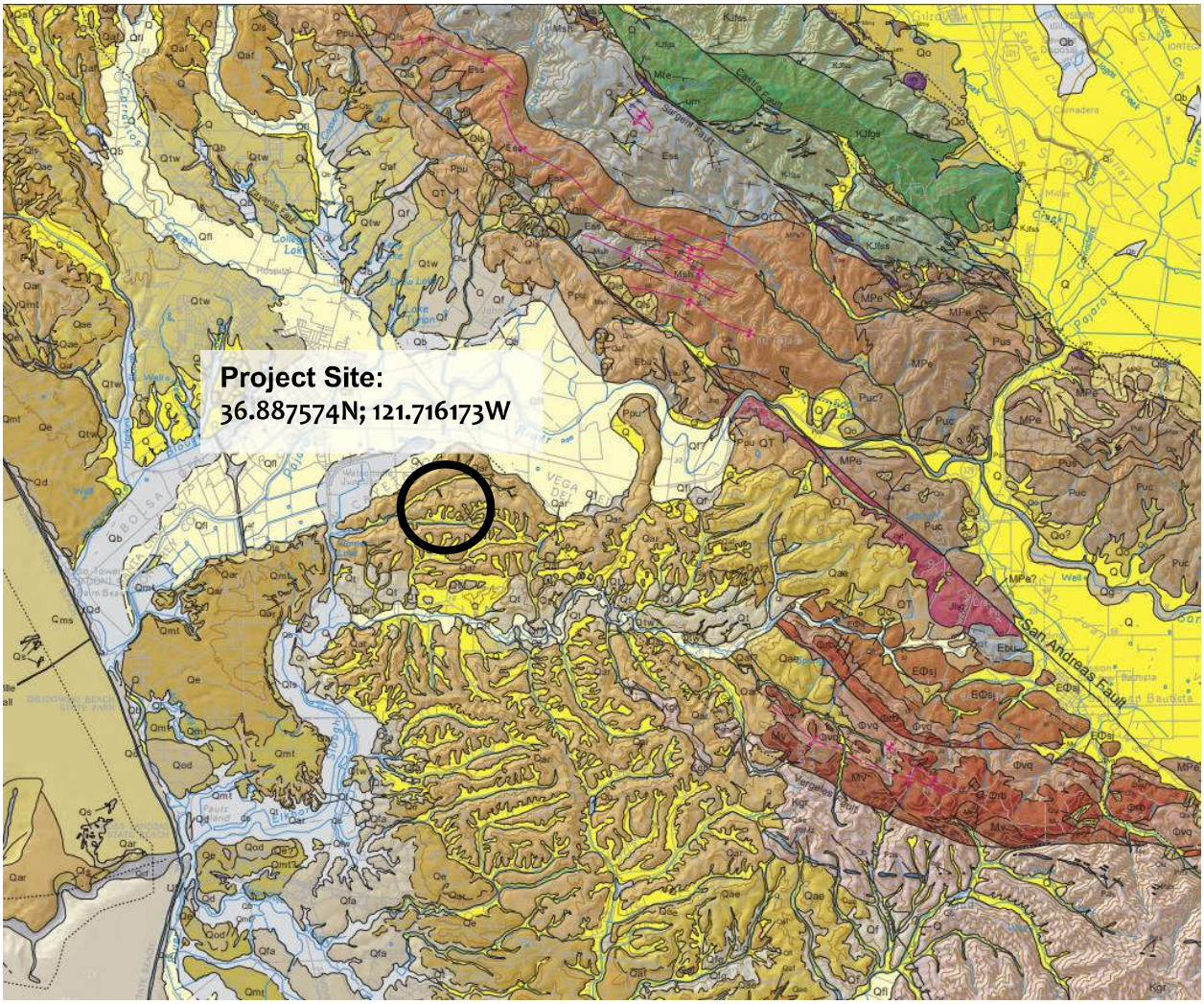

Figure 4: Geologic map of the project vicinity. San Andreas fault to the east of the site.

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RECOMMENDATIONS

Site Preparation

The site should be cleared of all obstructions, including trees and associated root systems, and debris. It should be anticipated that holes resulting from the removal of root systems of larger trees could extend to depths of 3 feet, and laterally to the drip line of each tree. Holes resulting from the removal of underground obstructions extending below the proposed finish grade should be cleared and backfilled with suitable material compacted to the requirements in this report. We recommend backfilling operations for any excavations to remove deleterious material be carried out under the observation of the geotechnical engineer.

After clearing, the portions of the site containing surface vegetation or organic laden topsoil should be stripped to an appropriate depth to remove these materials. At the time of our field exploration, we estimated that a stripping depth of approximately 1.5 inches would be required. The amount of actual stripping should be determined in the field by the geotechnical engineer at the time of construction. Stripped materials should be removed from the site, or stockpiled for later use in landscaping, if approved by the owner.

Subgrade Preparation

Following excavation to the required grades, soil subgrades in areas to receive engineered fill or pavements be scarified to a depth of at least 8 inches, moisture conditioned to at least optimum moisture content and compacted to at least 90 percent relative compaction (ASTM D1557). The top 6 inches of subgrade in areas to receive pavements should be moisture conditioned and compacted to at least 95 percent relative compaction (ASTMD1557). Locally weak soils, if encountered, should be excavated and replaced, or otherwise stabilized as recommended by the geotechnical engineer at the time of construction. The compacted surface should be firm and unyielding and should be protected from damage caused by traffic or weather. Soil subgrades should be kept moist during construction. If the subgrade is allowed to become dry, it should be moisture conditioned to eliminate shrinkage cracks.

In order to achieve satisfactory compaction of the subgrade and fill materials, it may be necessary to adjust the water content at the time of construction. This may require that water be added to soils that are too dry, or that scarification and aeration be performed in any soils that are too wet.

If required, we recommend areas of unstable soils be overexcavated to competent soils or a minimum of 18 inches below finished subgrade elevation where competent soils are not encountered. The bottom of the excavation should then be completely covered with a ground stabilization geotextile fabric such as Mirafi 500X, or equivalent, and backfilled with Class 2 aggregate base. Alternative stabilization methods such as lime treatment may also be considered at the time of construction.

Engineered Fill Materials

All fill placed at the site should consist of engineered fill meeting the requirements presented in this report, except for landscaping materials which are placed on level ground. Onsite soil below the stripped layer and having an organic content of less than 3 percent by volume can be used as fill. All engineered fill placed at the site, including onsite soils, should not contain rocks or lumps larger than

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4 inches in greatest dimension and contain no more than 15 percent larger than 2.5 inches. "Non-expansive" fill should be predominantly granular have an organic content of less than 3 percent by volume, should have a liquid limit less than 40 percent, have a plasticity index not exceeding 15, and should contain no environmental contaminants or debris. Imported fill should consist of "non-expansive" fill/ or have a maximum plasticity index of 15.

Fill Placement and Compaction

Engineered fill should be compacted to at least 90 percent relative compaction as determined by ASTM Designation D1557. The upper 6 inches of subgrade soils beneath pavements should be compacted to at least 95 percent relative compaction. Fill material should be spread and compacted in lifts not exceeding 8 inches in uncompacted thickness when using conventional compaction equipment. In order to achieve satisfactory compaction of the subgrade and fill materials, it may be necessary to adjust the water content at the time of construction. This may require that water be added to soils that are too dry, or that aeration be performed in any soils that are too wet.

Pipe Bedding and Trench Backfill

Utility pipes should be bedded in clean sands (conforming to the State of California Department of Transportation [Caltrans] Standard Specification Section 19-3.025B) that extend to at least 6 inches above the top of pipe. Pipeline trenches should be backfilled with materials satisfying the criteria described above for fill, placed in lifts of approximately 8 inches in uncompacted thickness. However, thicker lifts may be used provided the method of compaction is approved by the project geotechnical engineer and the required minimum degree of compaction is achieved.

Onsite soil used for trench backfill should be compacted to at least 90 percent relative compaction by mechanical means only (jetting should not be permitted). Sand can be used for trench backfill if it is compacted to at least 95 percent relative compaction and sufficient water is added during backfilling operations to prevent the soil from "bulking" during compaction. The upper 3 feet of trench backfill below slab and pavements should be compacted to at least 95 percent relative compaction.

Limitations

Our services consist of professional opinions, conclusions, and recommendations that are made in accordance with generally accepted engineering principles and practices. This warranty is in lieu of all other warranties, either expressed or implied.

This report has been prepared for the exclusive use of Ella Industries and their consultants for specific application to the project as described herein. In the event that there are any changes in the ownership, nature, design, or location of the proposed project, or if any future additions are planned, the conclusions and recommendations contained in this report should not be considered valid unless 1) the project changes are reviewed by Storesund Consulting, and 2) conclusions and recommendations presented in this report are modified or verified in writing.

Reliance on this report by others must be at their risk unless we are consulted on the use or limitations. We cannot be responsible for the impacts of any changes in standards, practices, or regulations subsequent to performance of services without our further consultation. We can neither

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vouch for the accuracy of information supplied by others, nor accept consequences for un-consulted use of segregated portions of this report.

Closure

We appreciate the opportunity to be of continued service. Please feel free to contact me with any questions or comments regarding the information presented in this report via phone (510) 526-5849 or email (rune@storesundconsulting.com).

Sincerely,

DocuSigned by:
Rune Storesund
DF532BD6D79F4A6...

Rune Storesund, D.Eng., P.E., G.E.
Consulting Engineer

Enclosures Fisher 1988 Report

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CHARLES A. FISHER, CEEG, INC.
CIVIL ENGINEER - SURVEYOR - GEOLOGIST
P. O. BOX 1417
SOQUEL, CA 95073
(408) 426-6965

RCE 16073
EG 262

88002
Job No.
July 24, 1988
Date

[redacted]

RE: Geologic investigation and report
APN 117-471-3 thru 7, 16
Monterey County, California (Prunedale area)

[redacted]

At your request, we have performed a geologic investigation encompassing the subject property. Since it is proposed to subdivide this property, it was our purpose to ascertain geologic conditions which may need to be recognized or mitigated during development.

This report addresses geologic conditions observed during our investigation and presents conclusions and recommendations based on these observations.

Very truly yours,

REGISTERED GEOLOGIST
CHARES A. FISHER
No. 262
CERTIFIED ENGINEERING GEOLOGIST
STATE OF CALIFORNIA

Charles A. Fisher, CEEG, Inc.

CAF/cf
encl.

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CHARLES A. FISHER, CEEG, INC.
CIVIL ENGINEER - SURVEYOR - GEOLOGIST

Job No. 88002
July 24, 1988

INDEX

TITLE	PAGE
Cover letter	Front
Location and Description	1
Scope of Investigation	1
Regional Geology	2
Faults and Seismicity	3
Site Geology	4
Conclusions and Recommendations	5
Bibliography	8
Site Location Plan	Figure 1
Regional Geologic Map (Dupré and Tinsley)	Figure 2
Wind Rose Diagram Based on Eolian Dune Depositional Orientation (Dupré)	Figure 3
Regional Fault Trace Map	Figure 4
Seismic Hazard Zone Map	Figure 5
Liquefaction Potential Map	Figure 6
Flood Plain (100-Year Frequency)	Figure 7
Geologic Site Map	Figure 8
Generalized Geologic Cross-Section	Figure 9
Location of Seismograph Lines Sketch Map	Figure 10
Seismograph Profile Line 1	Figure 11
Seismograph Profile Line 2	Figure 12
Seismograph Profile Line 3	Figure 13
Seismograph Profile Line 4	Figure 14
Seismograph Profile Line 5	Figure 15
Seismograph Profile Line 6	Figure 16
Seismograph Profile Line 7	Figure 17
Location of Borings Sketch Map	Figure 18
Log of Boring No. 1	Figure 19
Logs of Borings Nos. 2 & 3	Figure 20
Log of Boring No. 4	Figure 21
Log of Boring No. 5	Figure 22
Logs of Borings Nos. 6 & 7	Figure 23
Logs of Borings Nos. 8 & 9	Figure 24
Log of Boring No. 10	Figure 25
Log of Boring No. 11	Figure 26
Logs of Borings Nos. 12 & 13	Figure 27
Log of Boring No. 14	Figure 28
Percolation Tests	Table 1
Septic Study Recommendations	Table 2

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CHARLES A. FISHER, CEEG, INC.
CIVIL ENGINEER - SURVEYOR - GEOLOGIST

LOCATION AND DESCRIPTION

This site (APN 117-471-3 thru 7, 16) is located in the Prunedale area of north Monterey County, approximately 1.3 miles south of the Pajaro River (north boundary) and the City of Watsonville. More specifically, this site (consisting of 103 acres) occupies an area between Vega Road and Lewis Road, approximately 1700 feet east of their intersection and fronts on Vega Road (see Figure No. 1)

It is proposed to develop 20 single-family dwellings on the property. Presently the site lies fallow and contains no building structures. Eucalyptus groves occupy most of the surface area with small clear areas supporting light grass cover near Vega Road, and manzanita brush near the southeast corner. At present, existing eucalyptus trees are being harvested.

A significant bluff area dominates the southern third of the property (see Figure No. 8); the rest consists of gentler slopes (10-30%). Dominant drainage swales appear stable and do not exhibit severe erosion cuts. No recent excessive erosional areas were located on this property which indicates most surface drainage is absorbed in the permeable underlying soils. No indications of shallow groundwater or recent ground movement was observed.

SCOPE OF INVESTIGATION

Research consisted of reviewing pertinent literature cited in the Bibliography. Aerial stereo photographs were inspected also. Dense tree cover masks many ground features which are illustrated on topographic maps of the area.

In depth investigations consisted of drilling and logging holes which were utilized for percolation tests included in the septic disposal study portion of this report (see Figure No. 18 for locations of these borings). Further, refraction seismograph profiles were performed across various portions of the site (see Figure No. 10 for locations of these profiles). Several field trips were made to locate outcrops and study the general geomorphology of the area.

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REGIONAL GEOLOGY

Geologic mapping by Dupré and Tinsley (1980, Figure No. 2) show the subject area is underlain by geologically young Aromas sands (Qa). A description of these Aromas sands is shown on Figure No. 2. Surficial deposits above and adjacent to these sands consist of loose colluvium consisting of fine tan-inorganic-faceted sands and silts.

The relict Aromas Formation underlying this area was deposited by eolian processes in the form of large dunes, 200-300 feet high, during lower strands of sea level which resulted from worldwide glacial episodes. These dunal forms control topographic features present today. Geomorphologic forms illustrating this dunal topography consist of hills oriented along an east-west axis with steep northern slopes and gentler southern slopes. This orientation is illustrated by observing contour lines shown on Figure No. 1. Dupré[4] constructed a wind direction diagram (see Figure No. 3) based on this dunal orientation.

These relict dunal structures (est. 500 M years BP, Dupré)[4] have subsequently been truncated in part by fluvial processes and possibly seismicity from regional fault systems (see Figure No. 4). Presently there is no agreement as to affects of fluctuating sea level episodes affecting the base of the dunes, since no marine fossils have been located in their vicinity.

The relict dune structure has been preserved in most areas of central Monterey Bay due to formation of a resistant cap composed of hemetitic, slightly cemented red sand/sandstone. This forms a virtually impervious cap over softer dunal sands. This feature is responsible for creation of steep bluffs where the cap has been removed by natural processes and the softer underlying deposits are exposed.

Normally in other areas, i.e., north of the Pajaro River, Aromas sands were deposited on Purisima shallow lagoonal marine sandstones and shales of Pliocene Age. In this study area, deposition has been on lower Miocene granitic basement rocks (see Figure No. 9). These sands have been deposited up to 300 feet in thickness over most of the area, although in interdunal areas may be as thin as 60 feet to underlying granites. Some interdunal valleys are at or below the underlying water tables and contain small ponds as a result; i.e., Twin Lakes occupying San Miguel

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Canyon. These areas may be susceptible to liquefaction during major seismic events where shallow aquifers are contained in loose sands which may consolidate (see Figure No. 6 for locations of these areas).

FAULTS AND SEISMICITY

Several major faults in the central California coastal area represent potential for seismic hazard: the San Andreas Fault, the Rinconada Fault, the San Gregorio-Sur Fault, and the nearby Vergeles (Zayante) Fault system (see Figure 4). In the northern Monterey County, the San Andreas Fault and the Vergeles Fault are considered active and may have offset rock units of Quaternary age (last 2 to 3 million years) (Alquist-Priolo Special Studies Zone Act of 1972; Hall, 1985). Surface rupture has been recorded along the San Andreas Fault in recent history and estimated recurrent intervals have been calculated as follows: (1) for a Magnitude 8 earthquake, the recurrence interval is 50-200 years; (2) for a Magnitude 7 earthquake, the recurrence interval is 7-30 years; and for a Magnitude 6 earthquake, the recurrence interval is 3-10 years.

Activity on the Vergeles Fault may be as recent as Holocene (11,000 years ago) as indicated by fault-controlled geomorphology and offset Holocene fluvial deposits (Coppersmith and Griggs, 1978). Sea floor displacement of the Monterey Bay Fault (Greene and others, 1973) also shows that area to be seismically active.

Seismic data compiled by the U.S. Army Corp of Engineers (1985) show epicenters of earthquakes of Magnitude 4.0 to 4.9 during 1979 through 1982 along the San Andreas Fault about eight miles east of the Prunedale area. Seismic events of greater magnitude (5.0-5.9 and 6.0-6.9) have been recorded offshore on the San Gregorio Fault and onshore (north of Watsonville) along the Vergeles Fault between 1900 and 1974. Seismic activity of Magnitude 7.0 or greater has not been recorded within the immediate central Monterey Bay region.

Burkland and Associates (1974) have rated the area between Las Lomas and Prunedale at a seismic hazard of IV on a scale of I (lowest) to VI (highest) (Figure 5). The subject area lies three miles west of the projected trace of the Vergeles Fault and about eight miles west of the San Andreas Fault. Seismic activity centered within 10 miles of the subject area at a

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Richter Magnitude of 8.0 or greater may causes significant groundshaking and/or slope instability in both consolidated and unconsolidated materials.

Landslides, slope stability, and liquefaction are related to the occurrence of seismic activity. Landslide susceptibility surrounding and including this area is rated at V, which is moderately high (on a scale of I to VI). Landslide and erosion susceptibilities are based on mapping by Burkland and Associates, 1974, and the U.S. Geological Survey (Hall and others, 1974; Dupré and Tinsley, 1980).

SITE GEOLOGY

Our study revealed a shallow bedrock formation consisting of relict Aromas sand dune deposits previously described which exists over a large portion of the site. Where this formation is exposed, cementation has occurred to depths of six to eight feet. Areas where this has occurred are illustrated on Figure No. 8; shown as Qa. This area has been truncated to the south forming steep cliffs above colluvium Qc deposits and exposing underlying softer dunal sands. Configuration of this area indicates an ancient abrupt slope failure caused by unknown forces which may have occurred or that slower erosional processes may have undermined the looser sediments below the more resistant cap rock. It is our opinion that this area of the bluff and colluvial deposits below are presently in equilibrium and subject only to gradual weathering processes.

Areas surrounding the exposed cap rock consist of varying depths of loose, fine-grained silts and sands. Seismograph profiles on gentle slopes east of the exposed cap rock area indicate depths of 30 feet (see Figure No. 11) and 40 feet (see Figure No. 16) of looser colluvial sands above the denser underlying relict dunal sands. In areas where relict dune surface sands have not been exposed to weathering, it was difficult to differentiate between relict dunal sands and colluvium. Based on the red coloration of these sands, which occurred when they were exposed and subsequently buried by colluvium, it was possible to ascertain their depths during drilling shown on Logs of Boring Nos. 2 (Figure 20), 4 (Figure 21), 5 (Figure 22), 8 and 9 (Figure 24), 10 (Figure 25), and 11 (Figure 26.

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Upper soils were tested for disposal of on-site septic or leach water by performing falling head percolation tests on each boring.

The Monterey County Soil Report[15] indicates the colluvial areas are composed of Arnold loamy sand (Akf), 15-50% slopes, and designates the cap rock areas as Arnold-Santa Ynez complex (Ar). Septic disposal restraints are listed as severe in the report due to generally steep slope conditions, but lists a permeability rate of 6-20 inches per hour.

Our percolation test results are shown on Table No. 1. These tests ran from 0 rates in cap rock (Qa) areas to 50 inches per hour in colluvial (Qc) deposits.

Percolation holes were prepared by drilling holes 12 feet deep and placing a four-inch perforated pipe surrounded by drain rock 10 feet deep. The holes were presoaked 24 hours in advance and then tested (perked) from top to various depths over a period of six hours. Due to the rapid percolation and fine silt layers surrounding some of the holes, Borings Nos. 12 and 14 became silted above the bottom although we were able to get some tests by measuring the drawdown at shorter intervals. Borings Nos. 3 and 4 continually perked rapidly and had to be measured at closer intervals. Percolation of borings in or slightly above cap rock (Borings Nos. 6, 7 and 8) became static at shallow depths illustrating the impervious nature of these slightly cemented upper sands.

CONCLUSIONS AND RECOMMENDATIONS

Relict Aromas sand dune deposits dominate topography and surrounding colluvial deposits underlying the site. Mechanics of deposition of colluvial deposits surrounding the relict dunal formations is not clear. Whether these loose deposits have been transported by eolian processes and deposited against the relict dunes or are derived from weathering of the dunes themselves is subject to conjecture. Both display faceting which is indicative of wind-borne transportation. Colluvial deposits, being generally finer grained and not containing oxidized reddish particles, indicate these materials may have been transported greater distances to the site than underlying relict dune material. Relict dune material buried under these deposits still

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remain reddish. Apparently the cement has been leeched out probably as a result of percolating surface water.

Seismograph profiles did not reach any high velocity layers; competent bedrock velocities=10,000-15,000 feet per second. Hence, the deeper granitic basement is probably more than 60-70 feet below the site area. Profiles did not reveal any inconsistencies in the underlying soils which might indicate existence of shear zones. Usually these zones are indicated by sudden decreases in velocities on the profiles.

Materials recovered during drilling indicate composition of colluvial deposits is consistent across the site and relict dunal deposits in some areas extend to depths of at least 25 feet below colluvium. No free groundwater or indication of perched aquifers were encountered in any of the borings.

Percolation tests indicate high rates of infiltration of groundwater occurs in both colluvial deposits and relict dune deposits where the upper cemented cap rock has been penetrated and looser underlying dunal deposits are encountered.

Recommendations for design of septic systems based on percolation tests and the nature of soils encountered are shown on Table No. 2. High rates of infiltration obtained during percolation testing are illustrative of recent loose dunal deposits. Tests performed in these types of deposits in the Marina Area obtained rates of 40-50 inches per hour. Test results obtained at the study area were tempered based on the nature of soils encountered and conditions of testing. Since water did not remain in the bottom of holes exhibiting rapid infiltration, lateral transmission on top of impervious layers was not indicated. Areas where shallow, impervious layers may restrict infiltration will be encountered in some areas. These are designated on Table No. 2 as "Special Location Investigation Required". "Anticipated Design Infiltration Rates" were adjusted to spread out or deepen leach fields to retard lateral transmission in certain areas.

Loose, silty, fine sands will be encountered in building areas surrounding denser cap rock areas. These soils can be dealt with by shallow densifying and compaction methods in the building site areas at optimum moisture conditions. Unprotected cut or fill slopes in these areas will be subject to excessive erosion. Hence, it is recommended that these slopes be graded to

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a maximum of 3 horizontal to 1 vertical and not extend vertically above eight feet.

Areas underlain by cap rock may, in some cases, extend to depths of 12 feet or more (see Figure Nos. 23 and 24). These areas will support steeper and higher slopes but should be inspected on an individual basis by an engineering geologist.

Building structures on top of and adjacent to the bluff area should be held back a minimum of 25 feet. This area appears to be stable and the cap rock is competent to support structures. Erosion of these bluffs appears slow but could increase if exposed to excessive saturation; hence areas at the top must not be landscaped.

Lot No. 1 is the only area of the property which may extend into the 100-Year Frequency Flood Zone along Vega Road shown on Figure No. 7. The building envelope should be located above this elevation.

Liquefaction potential for the property is rated as moderate-low, except near Vega Road (see Figure No. 6). Based on our investigation, we do not consider liquefaction a hazard at this site due to the absence of shallow groundwater. Bore Hole No. 1 at Lot No. 1 located in the Vega Road area, rated as moderate, did not encounter any free groundwater to a depth of 12 feet; hence is also rated as low.

Lack of knowledge of activity and the proximity of the Vergeles Fault zone (approximately 3000 feet northeast of the property) (see Figure No. 1), reduce the probability of its shear area affecting this site. Activity on the major San Andreas system and its documented frequency of activity is the dominating seismic threat to this site. Due to the composition of underlying granular soils, only normal seismic restraints need be imposed for development.

CAF/cf

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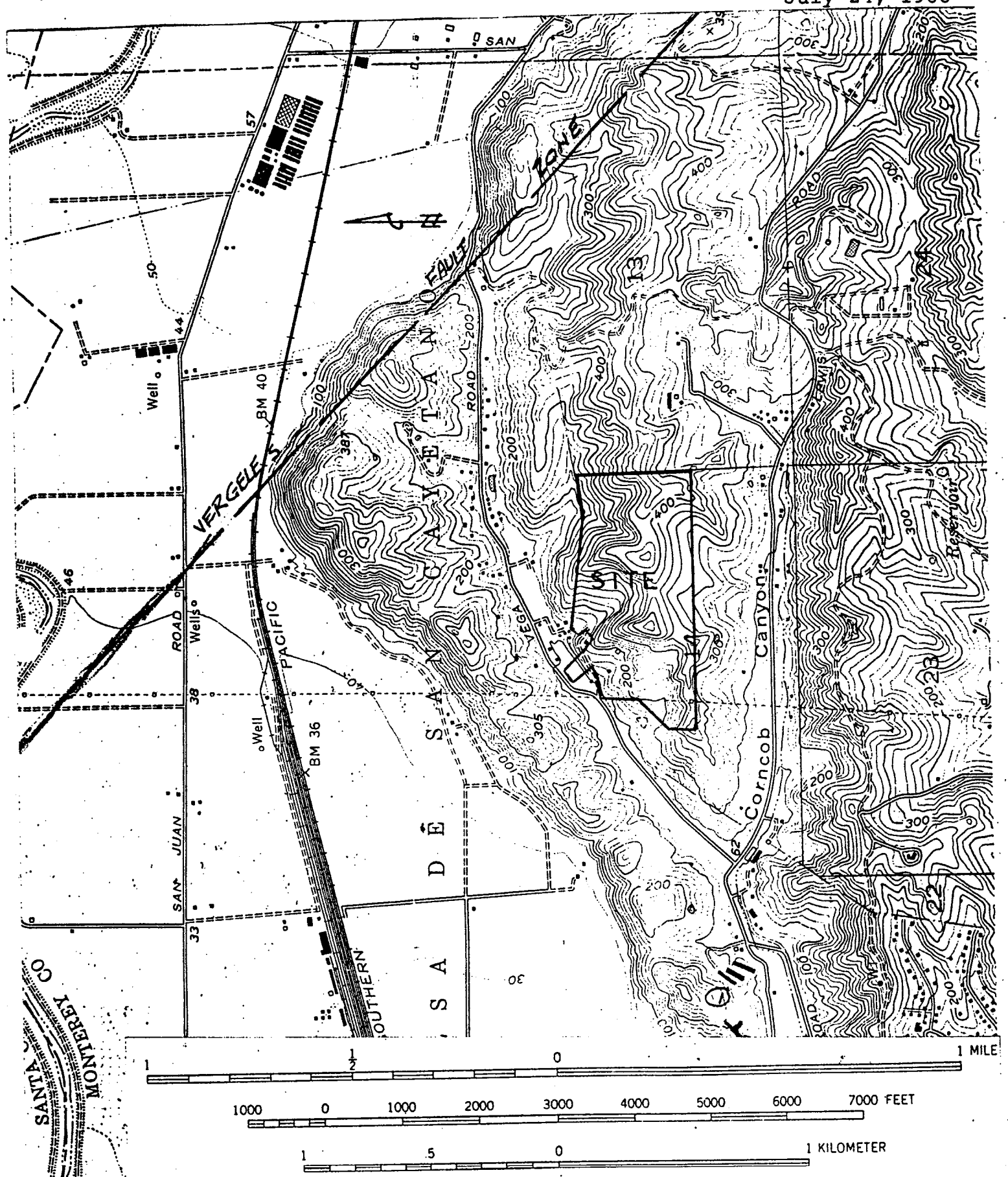

CONTOUR INTERVAL 20 FEET
DASHED LINES REPRESENT 10-FOOT CONTOURS
DATUM IS MEAN SEA LEVEL

SITE LOCATION PLAN

FIGURE NO. 1

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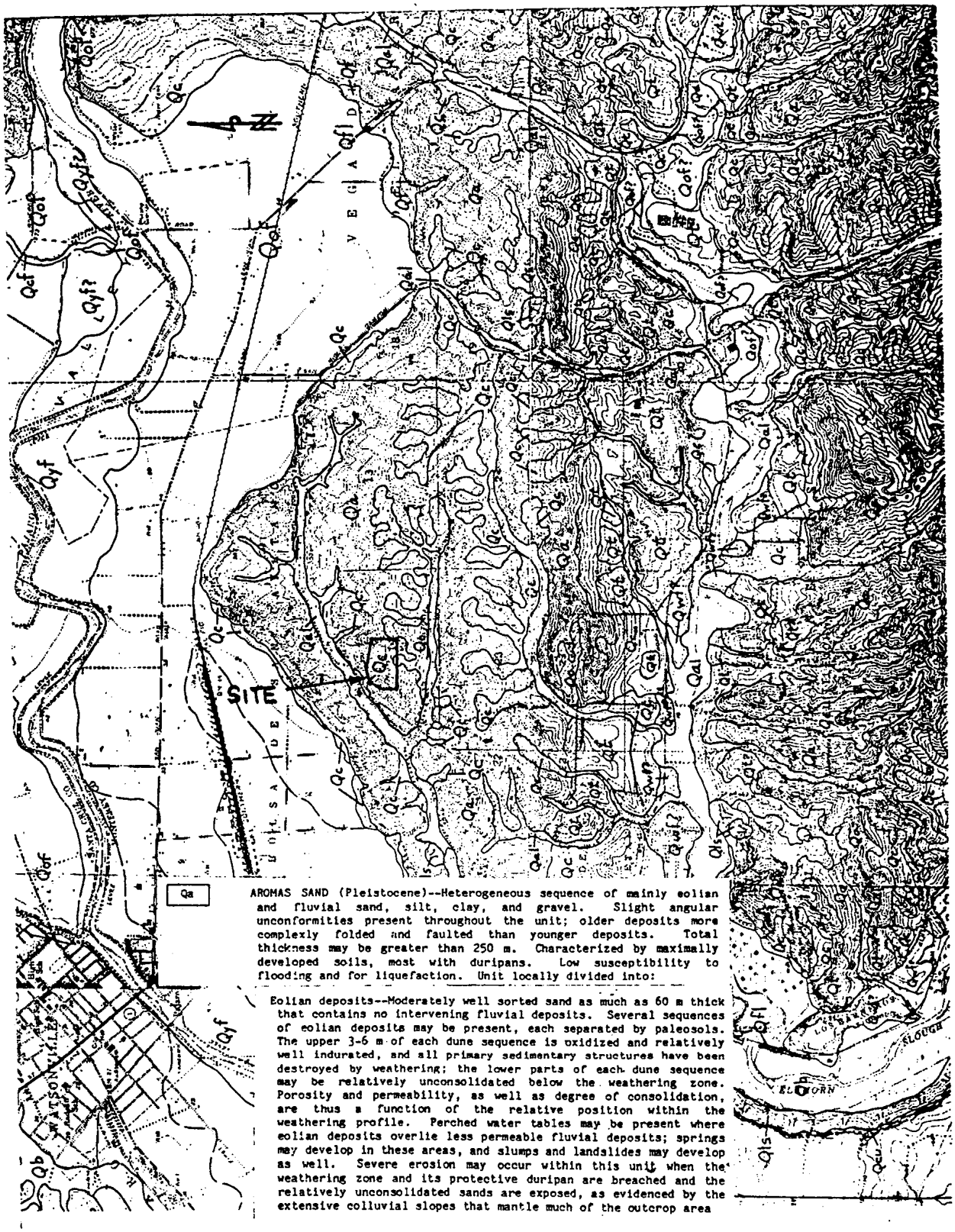

REGIONAL GEOLOGIC MAP (DUPRE AND TINSLEY)

FIGURE NO. 2

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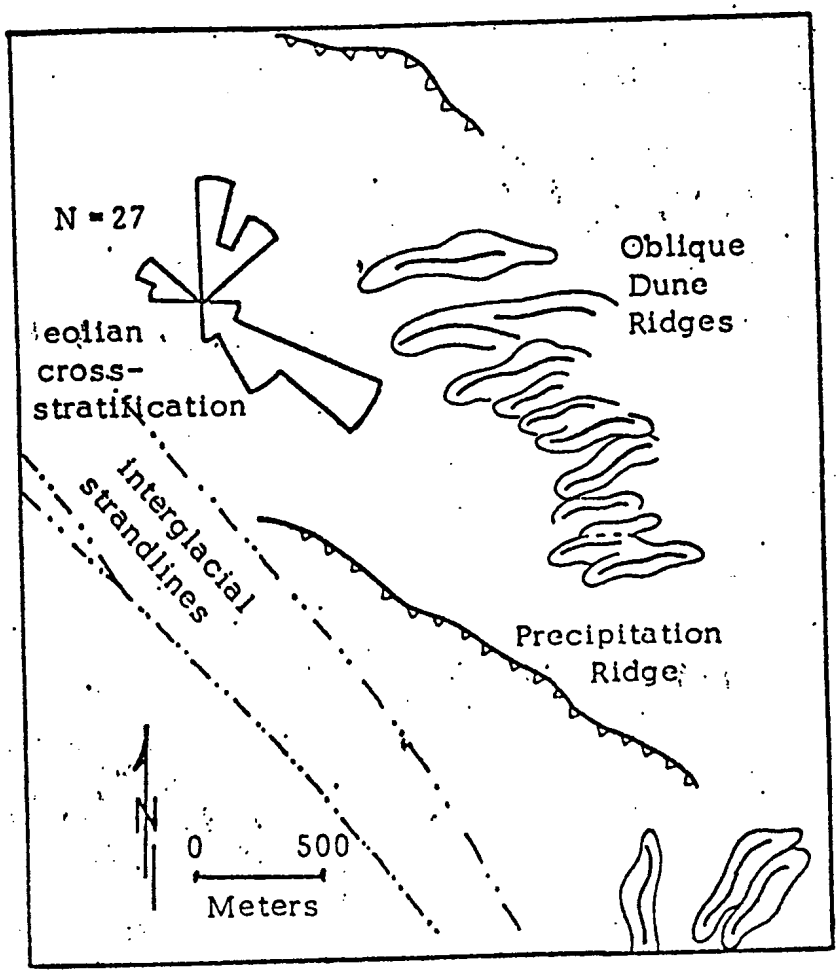

B: Pleistocene Coastal Dunes, (Aromas), Monterey Bay region, California

WIND ROSE DIAGRAM BASED ON
EOLIAN DUNE DEPOSITIONAL ORIENTATION (DUPRE)

FIGURE NO. 3

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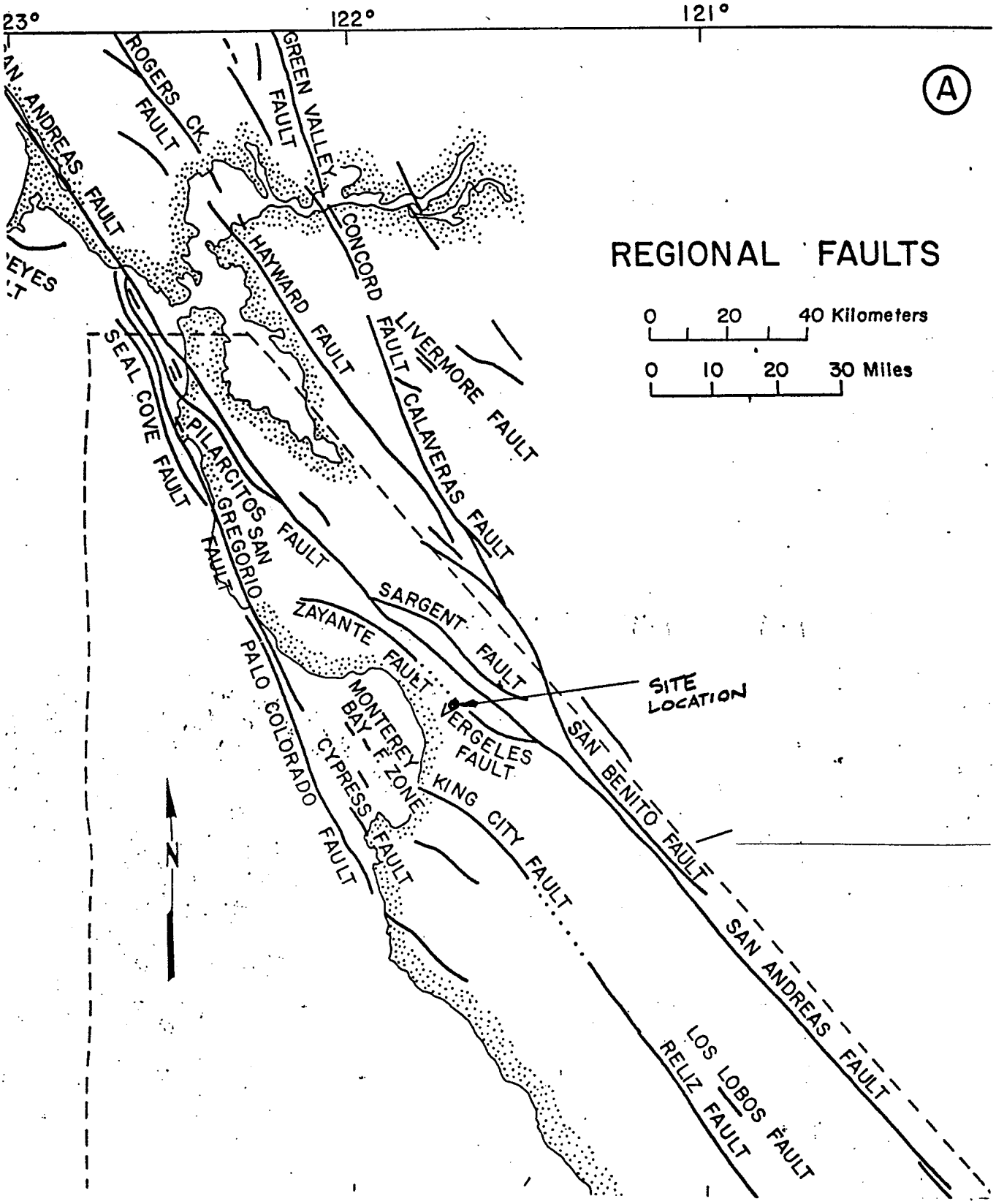

REGIONAL FAULT TRACE MAP

FIGURE NO. 4

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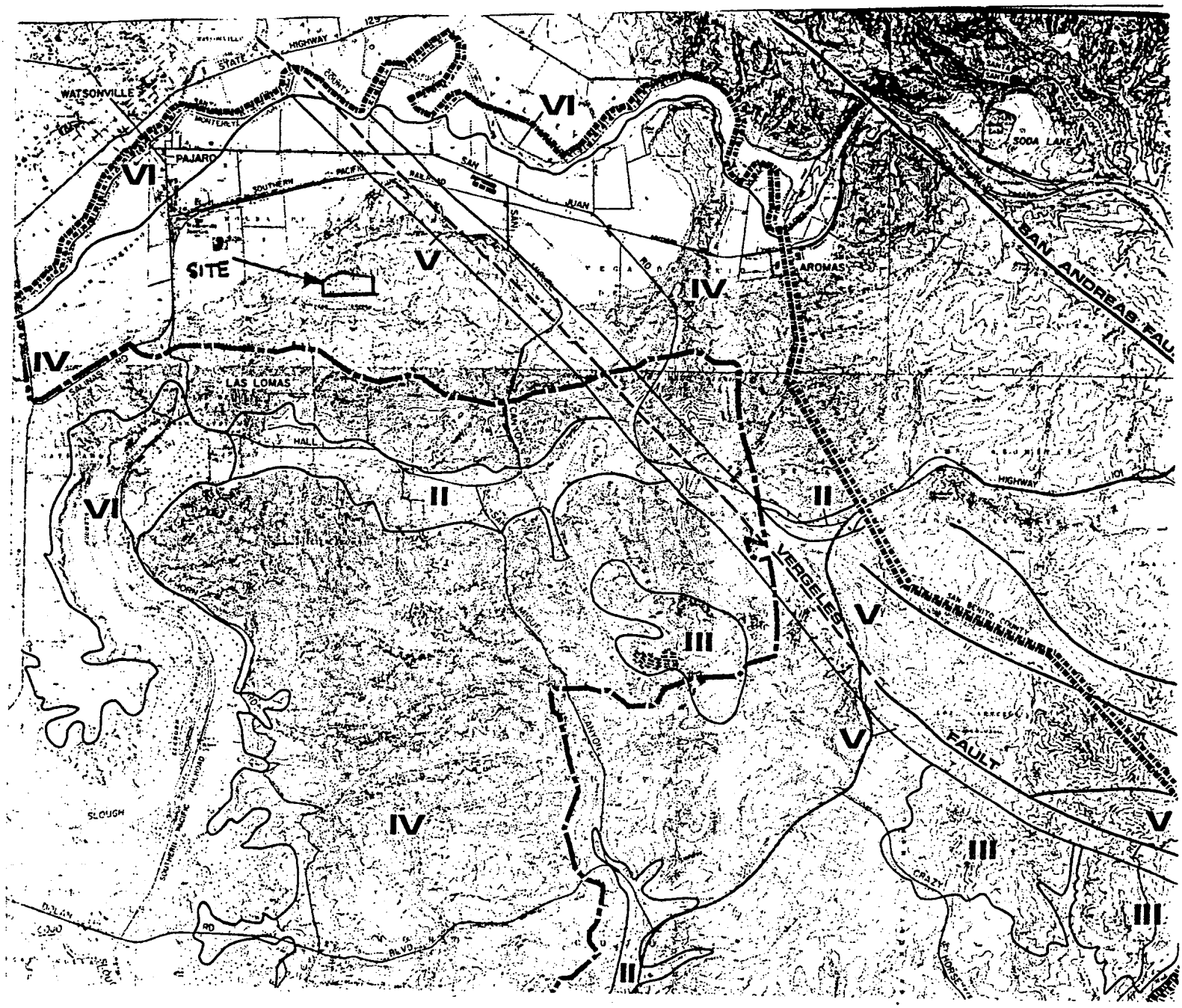

SEISMIC HAZARD ZONE MAP

FIGURE NO. 5

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LIQUEFACTION POTENTIAL MAP

FIGURE NO. 6

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FLOOD PLAIN (100-YEAR FREQUENCY)

FIGURE NO. 7

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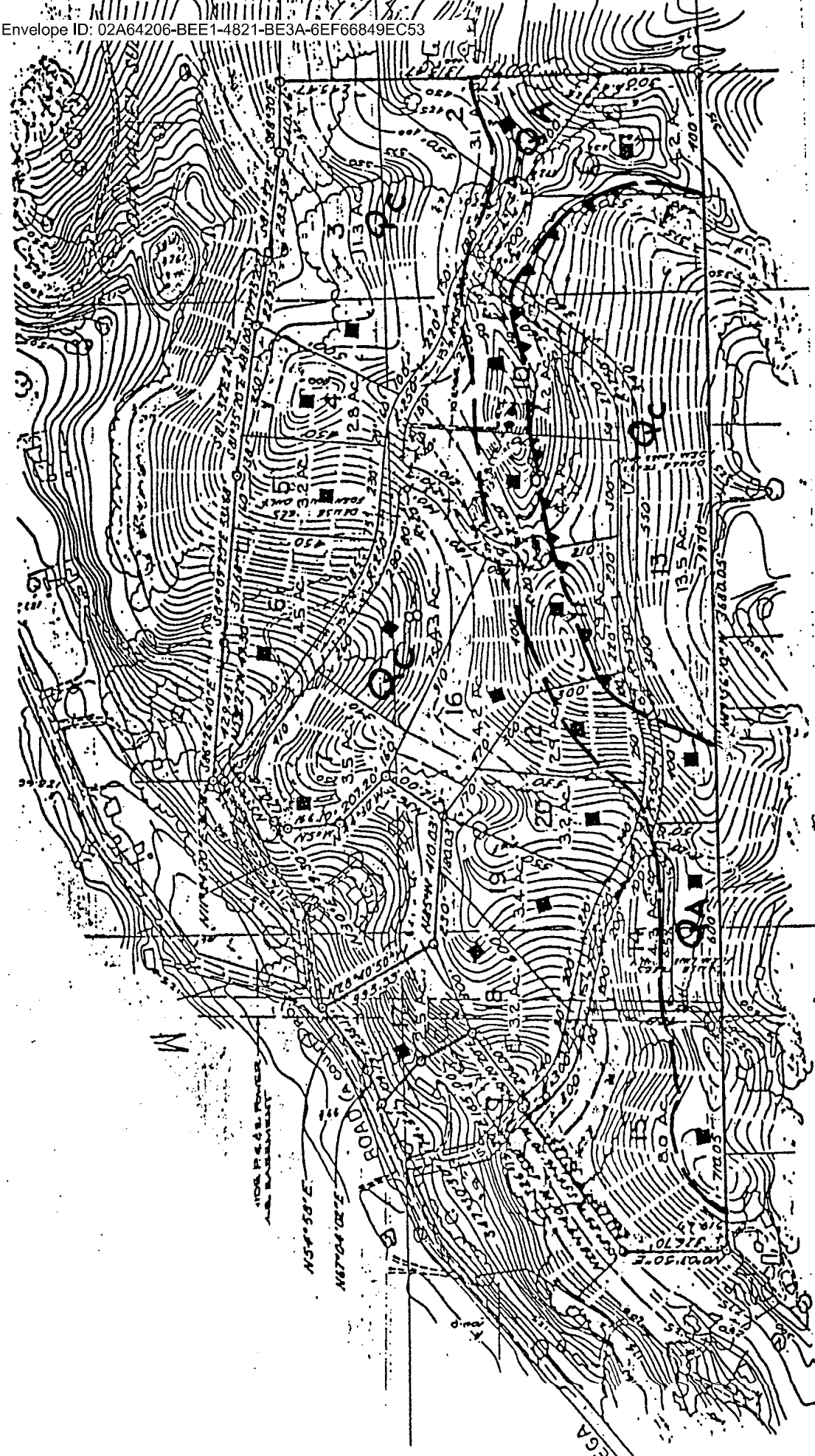

Q_C Contact Line
Q_A

Top of Bluff

■ Building site

Q_C Quaternary Colluvium

Q_A Relict Aromas Formation outcrop red, slightly cemented sandstone

GEOLOGIC SITE MAP

FIGURE NO. 8

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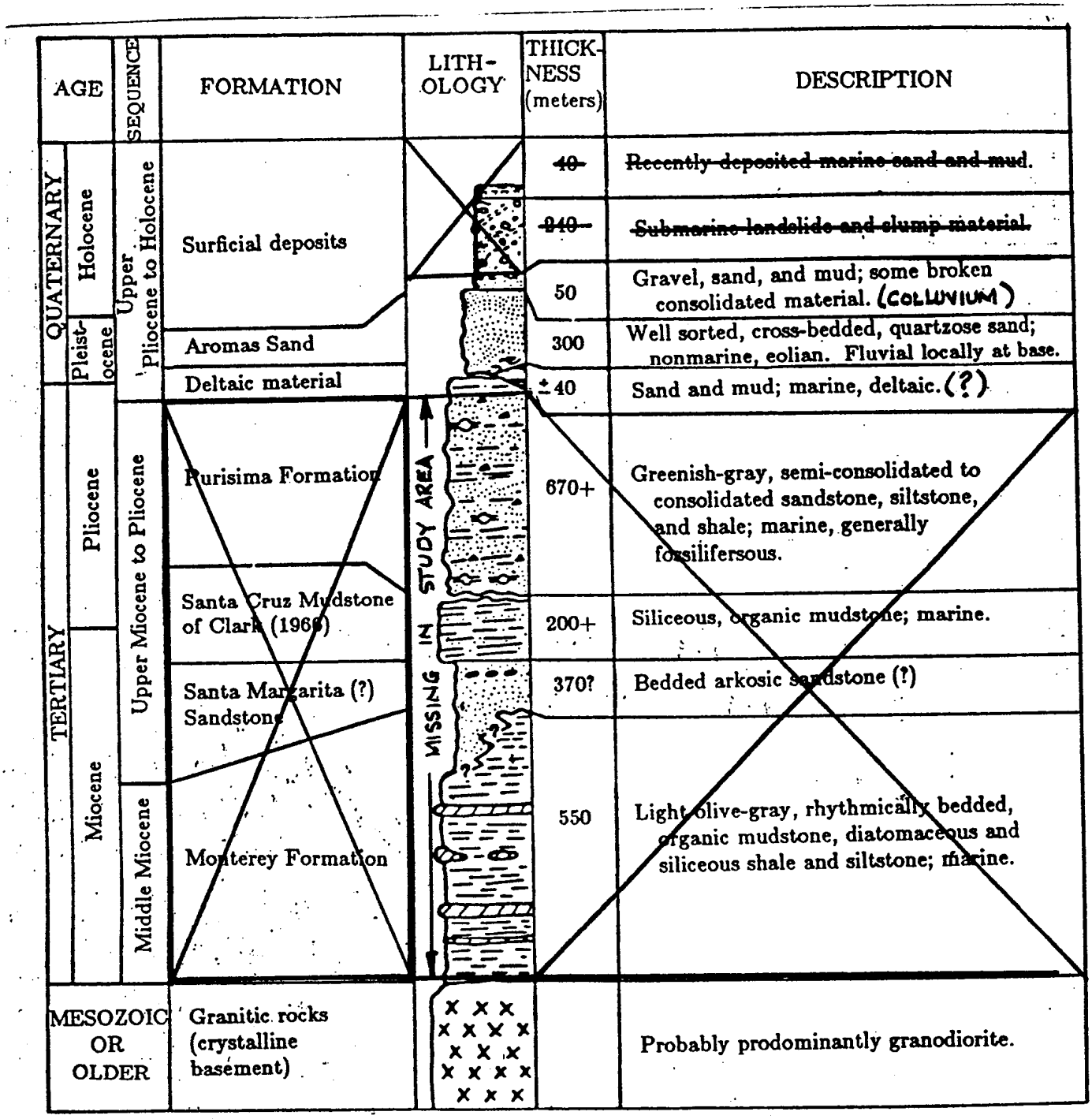

GENERALIZED GEOLOGIC CROSS-SECTION

FIGURE NO. 9

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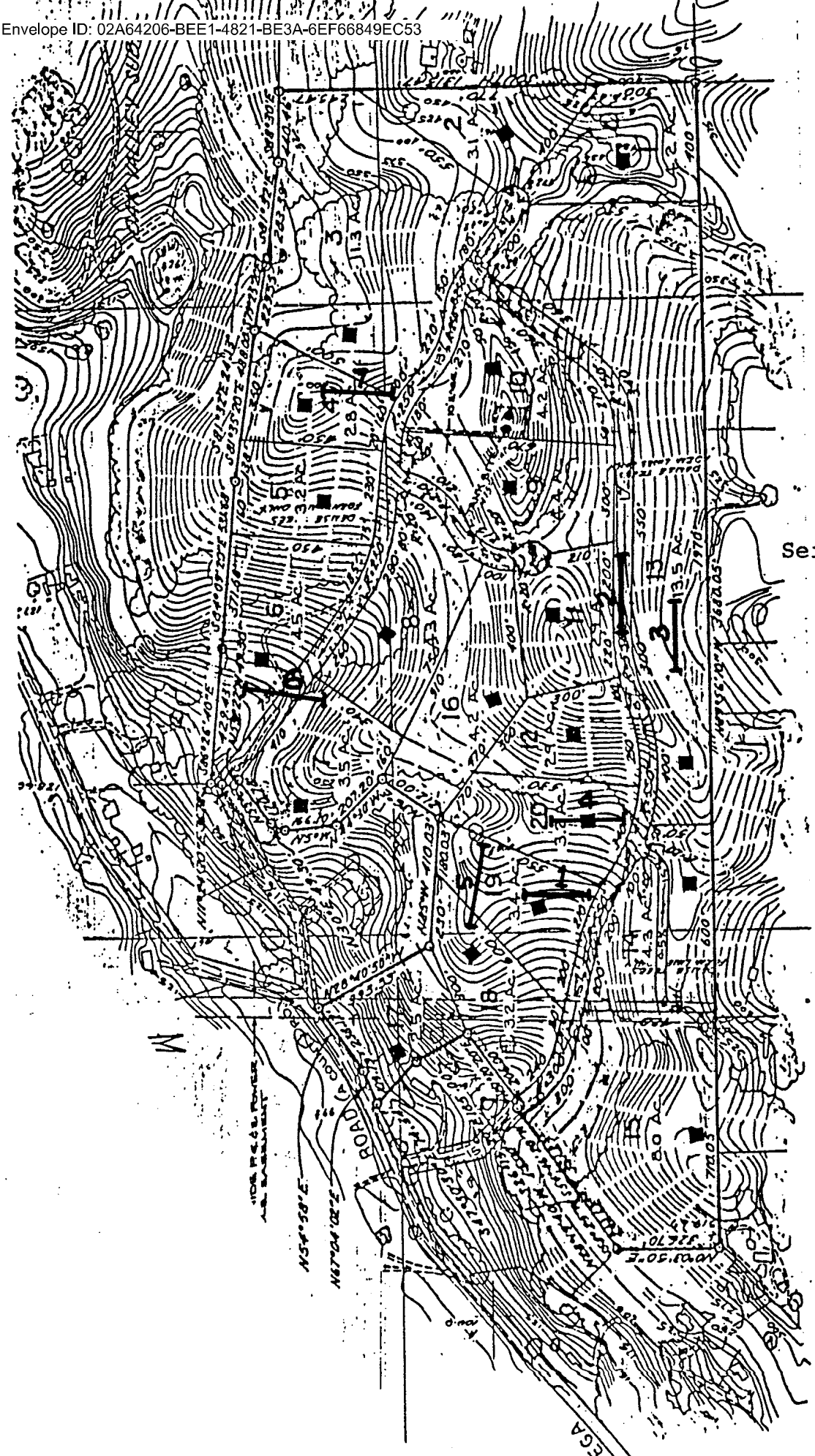

LOCATION OF SEISMOGRAPH LINES SKETCH MAP

FIGURE NO. 10

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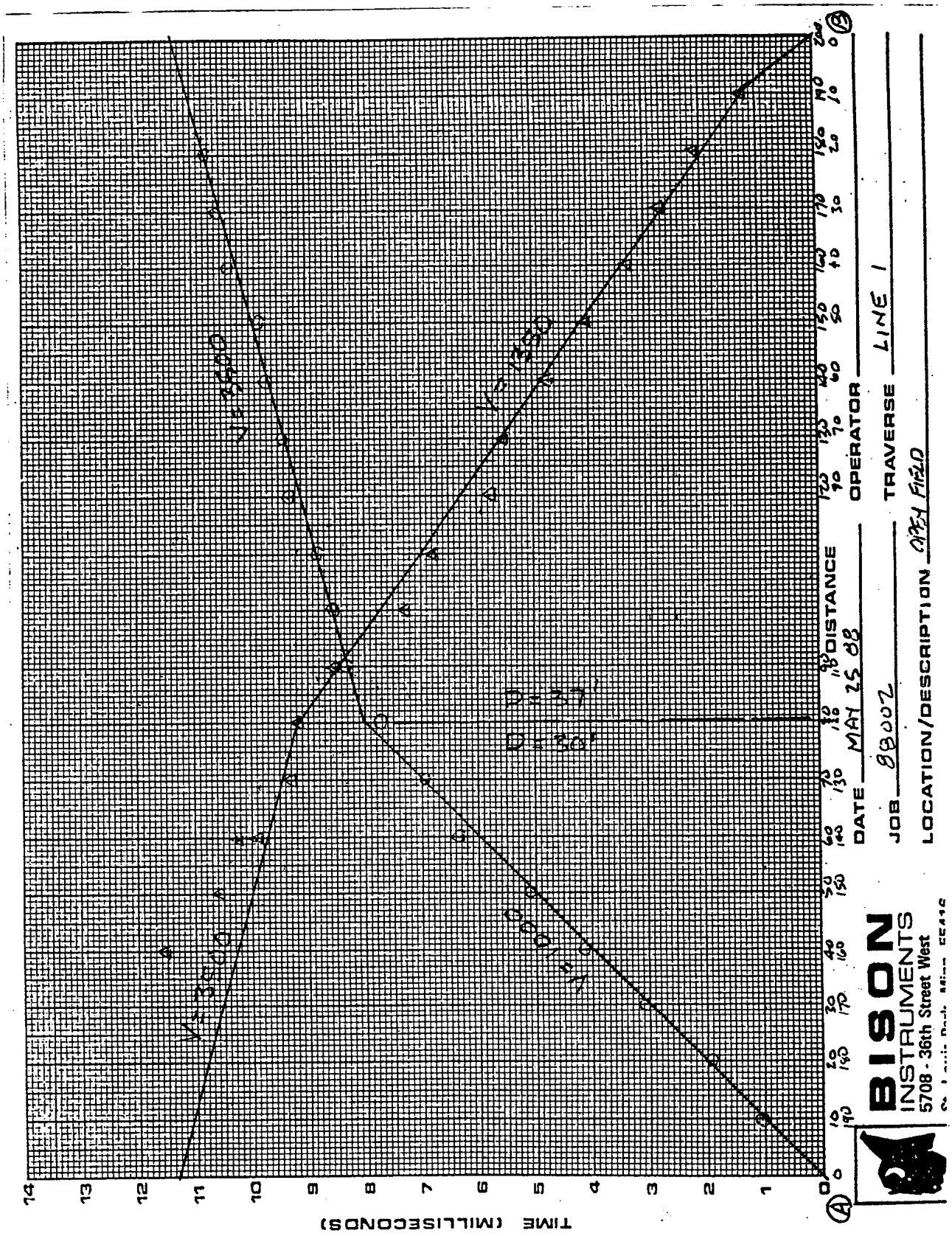

SEISMOGRAPH PROFILE LINE 1

FIGURE NO. 11

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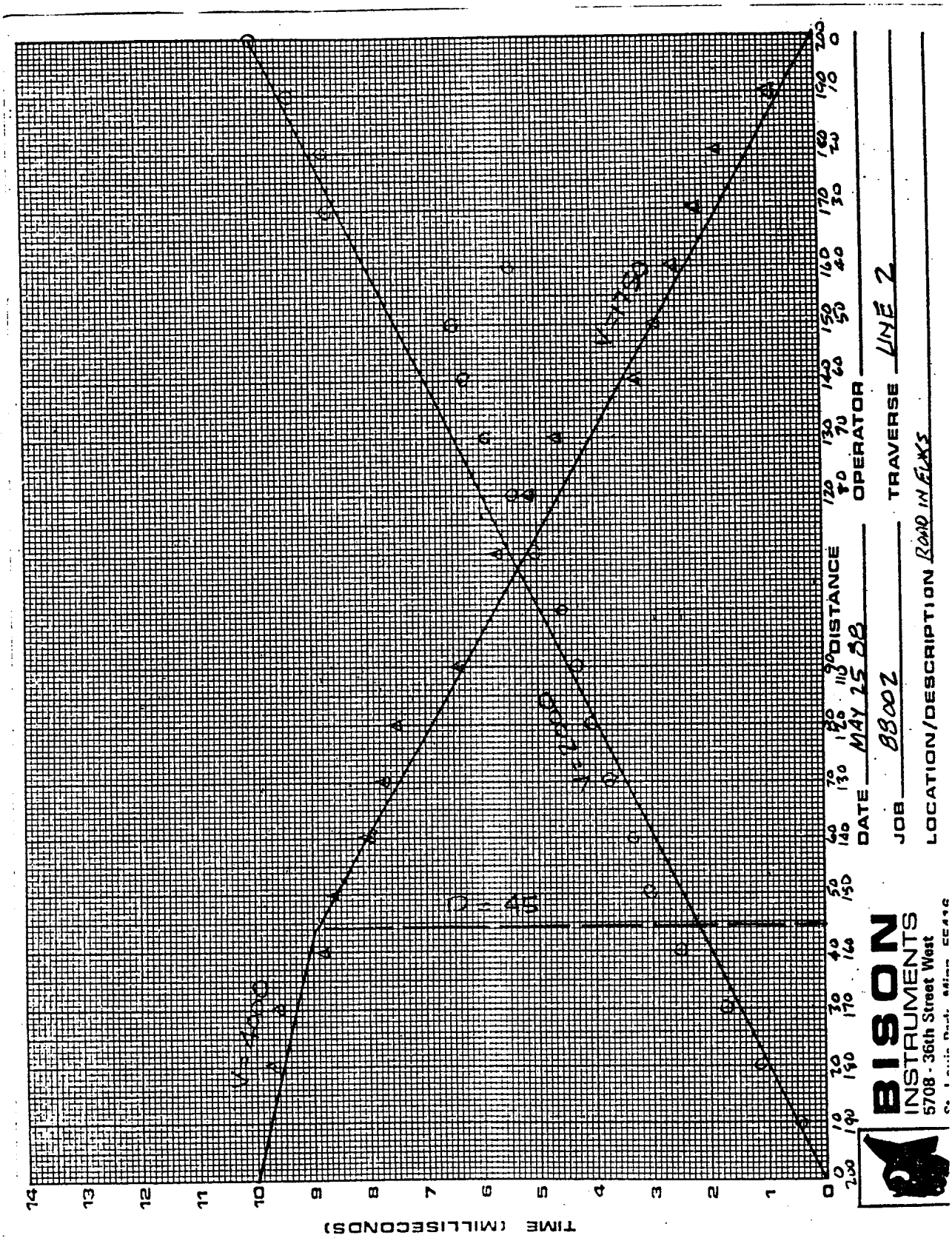

SEISMOGRAPH PROFILE LINE 2

FIGURE NO. 12

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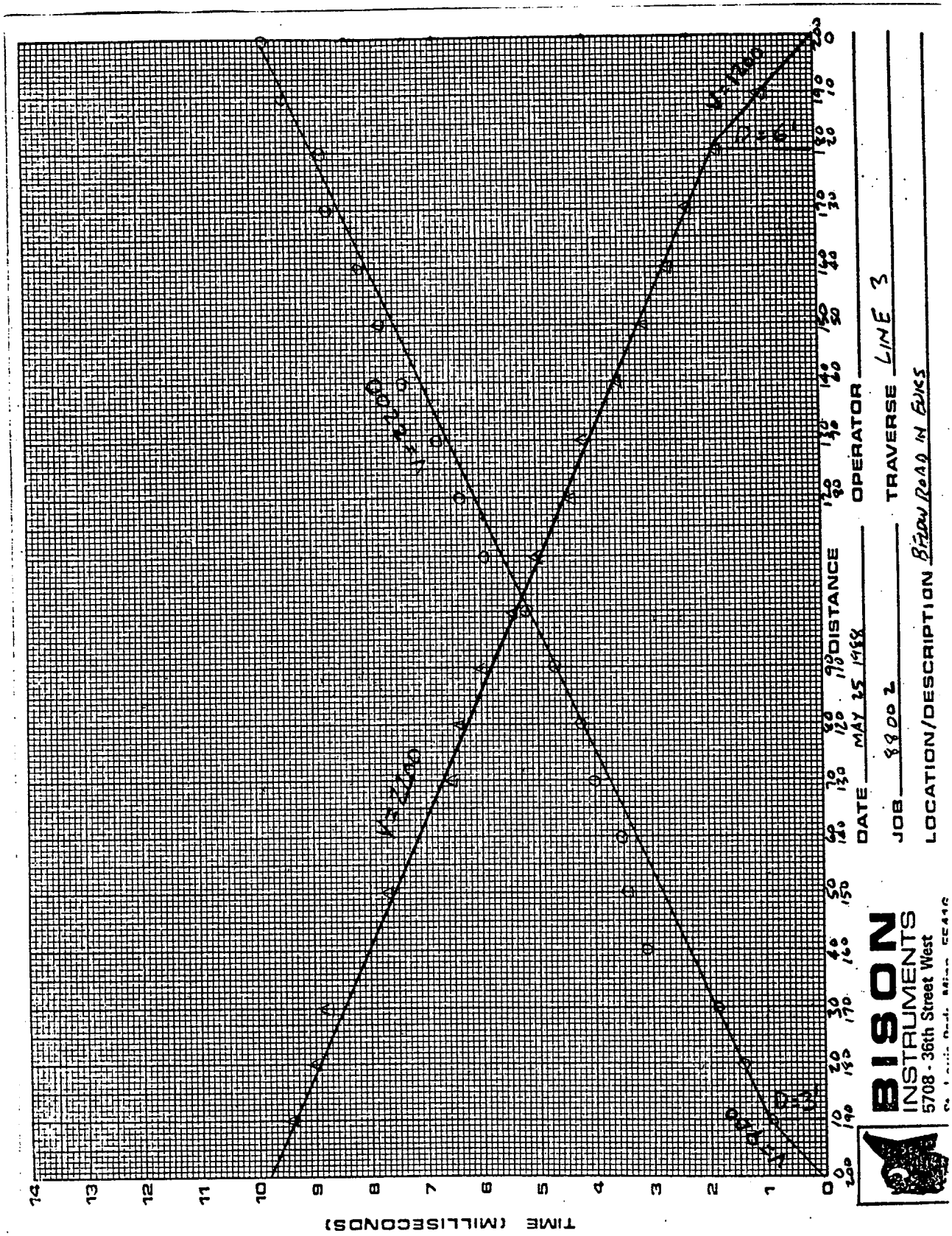

SEISMOGRAPH PROFILE LINE 3

FIGURE NO. 13

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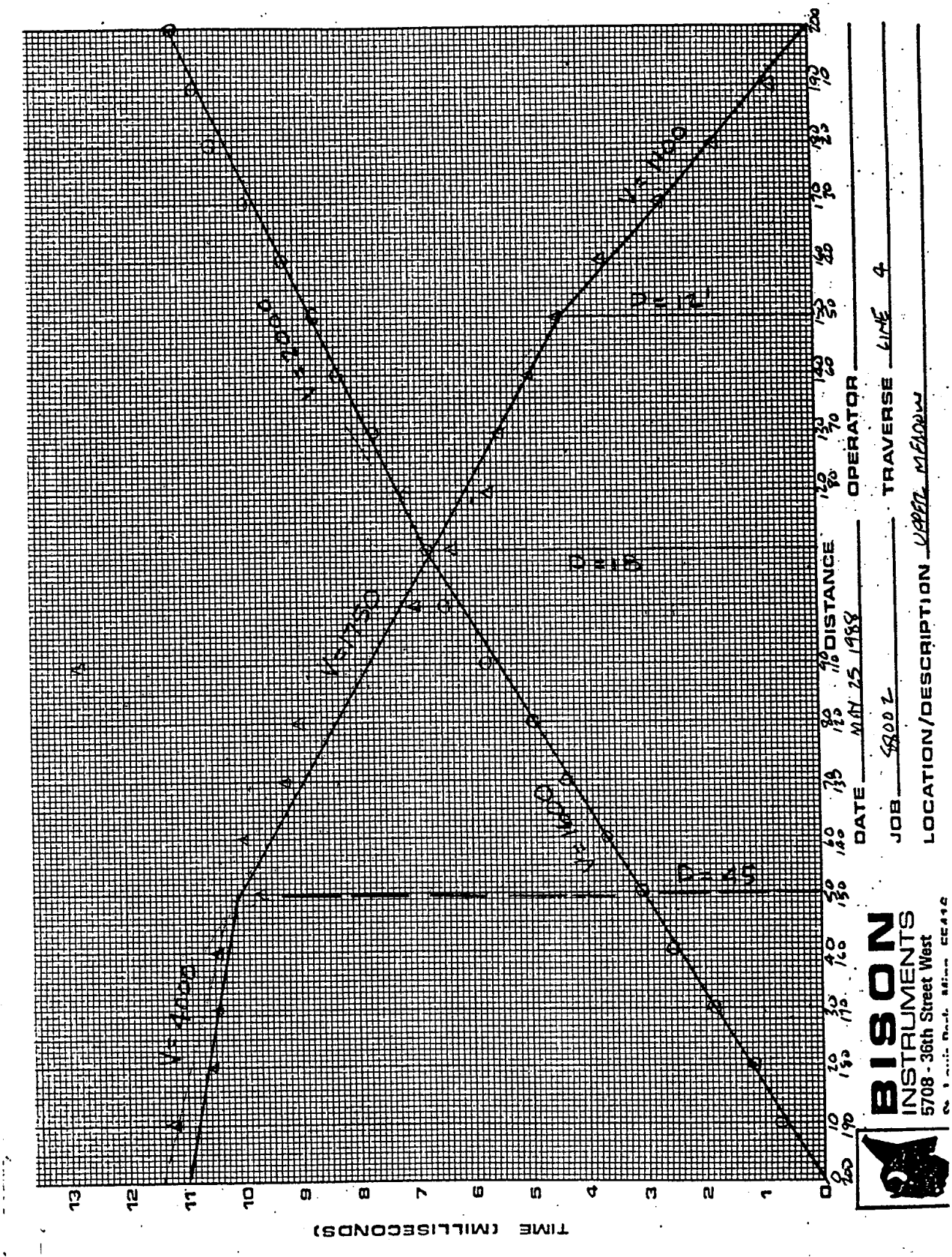

SEISMOGRAPH PROFILE LINE 4

FIGURE NO. 14

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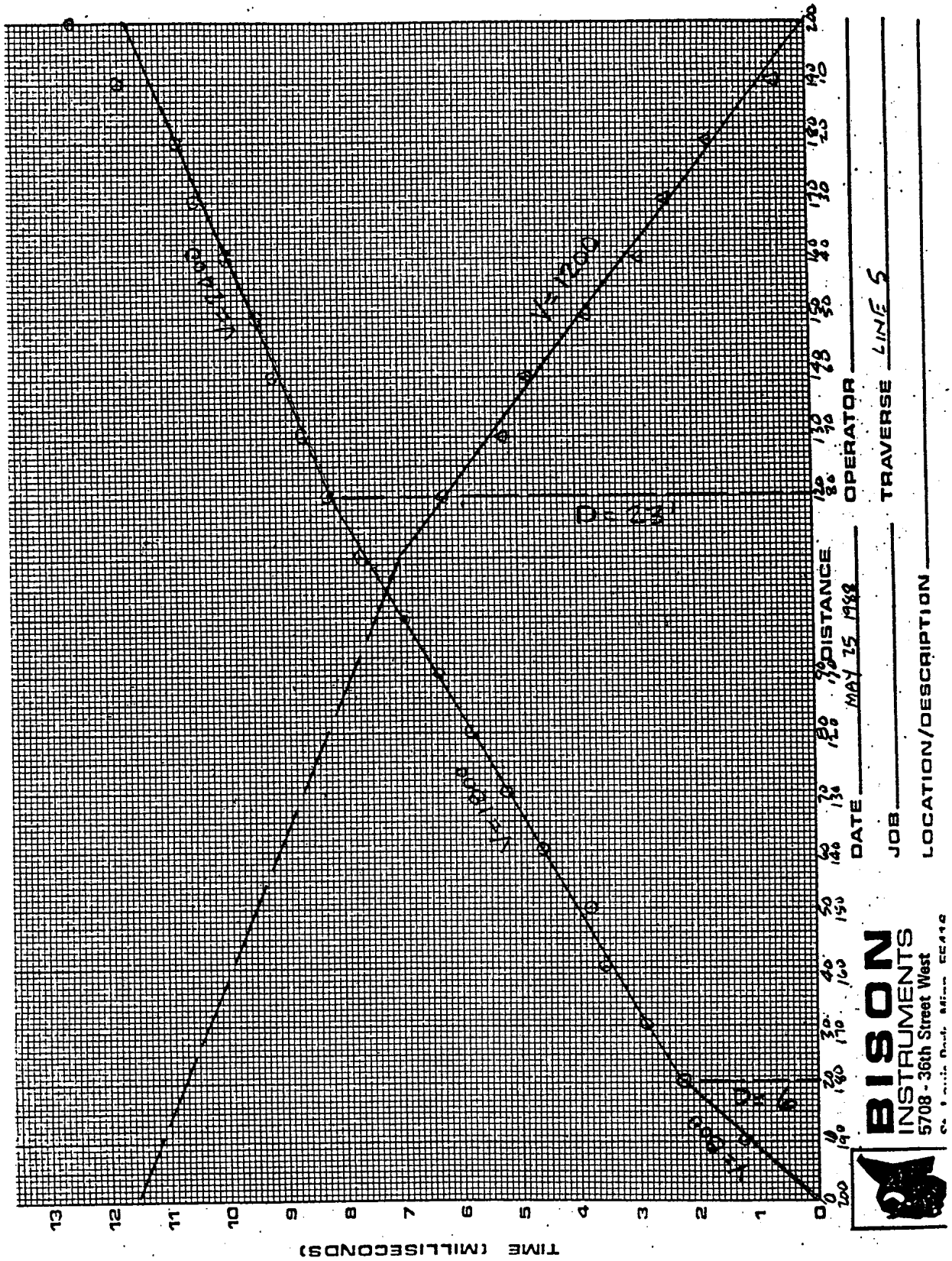

SEISMOGRAPH PROFILE LINE 5

FIGURE NO. 15

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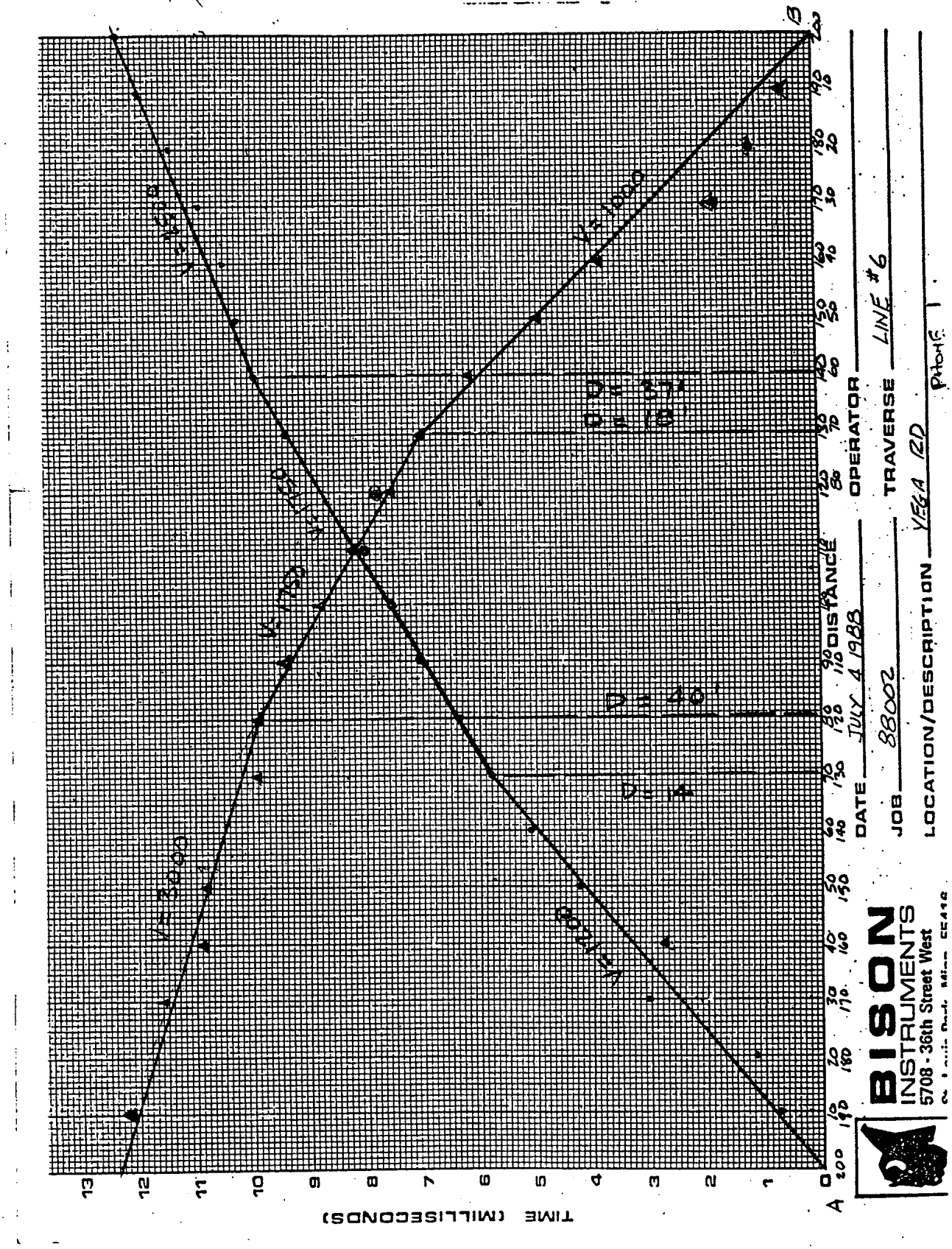

SEISMOGRAPH PROFILE LINE 6

FIGURE NO. 16

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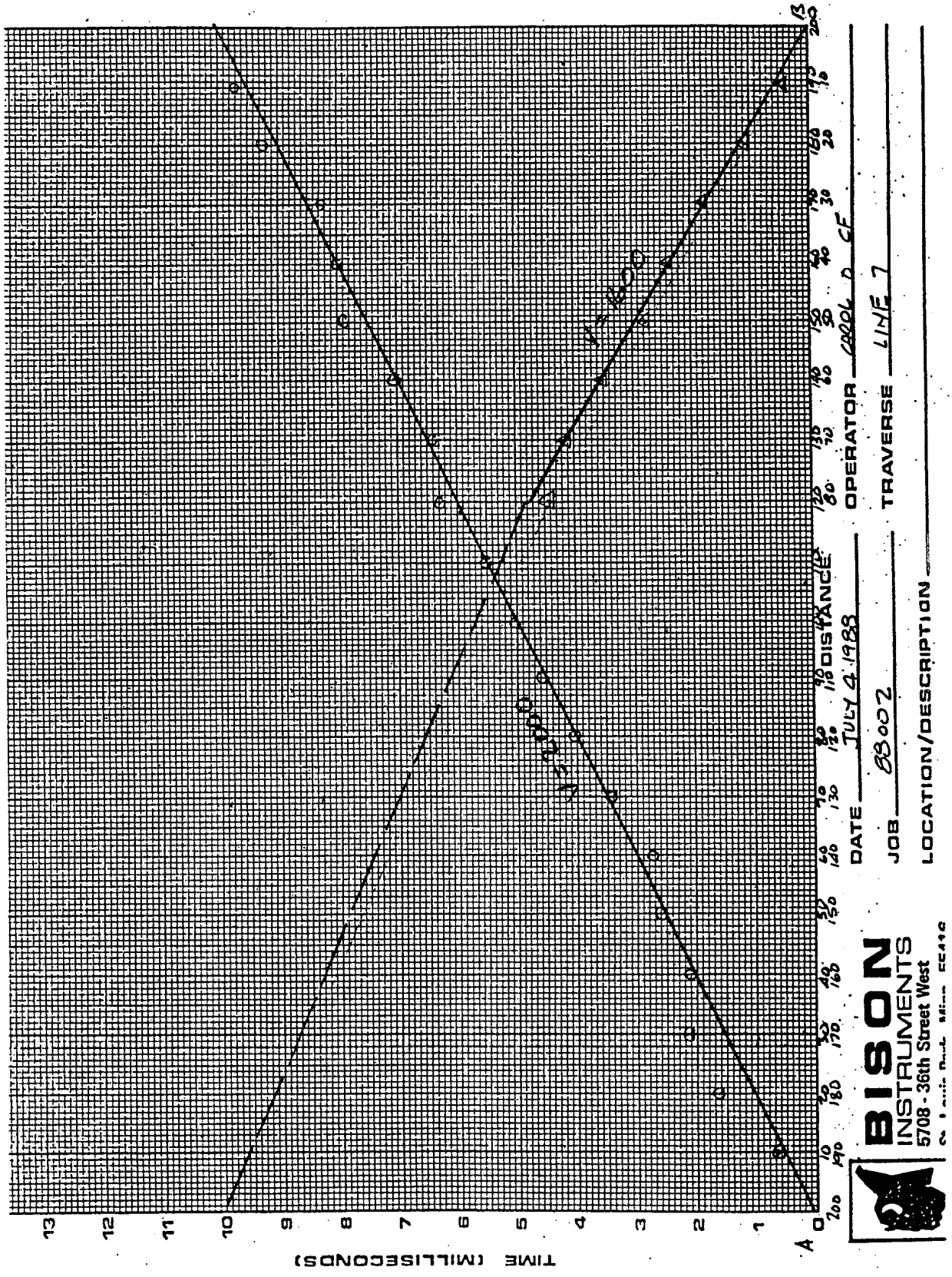

SEISMOGRAPH PROFILE LINE 7

FIGURE NO. 17

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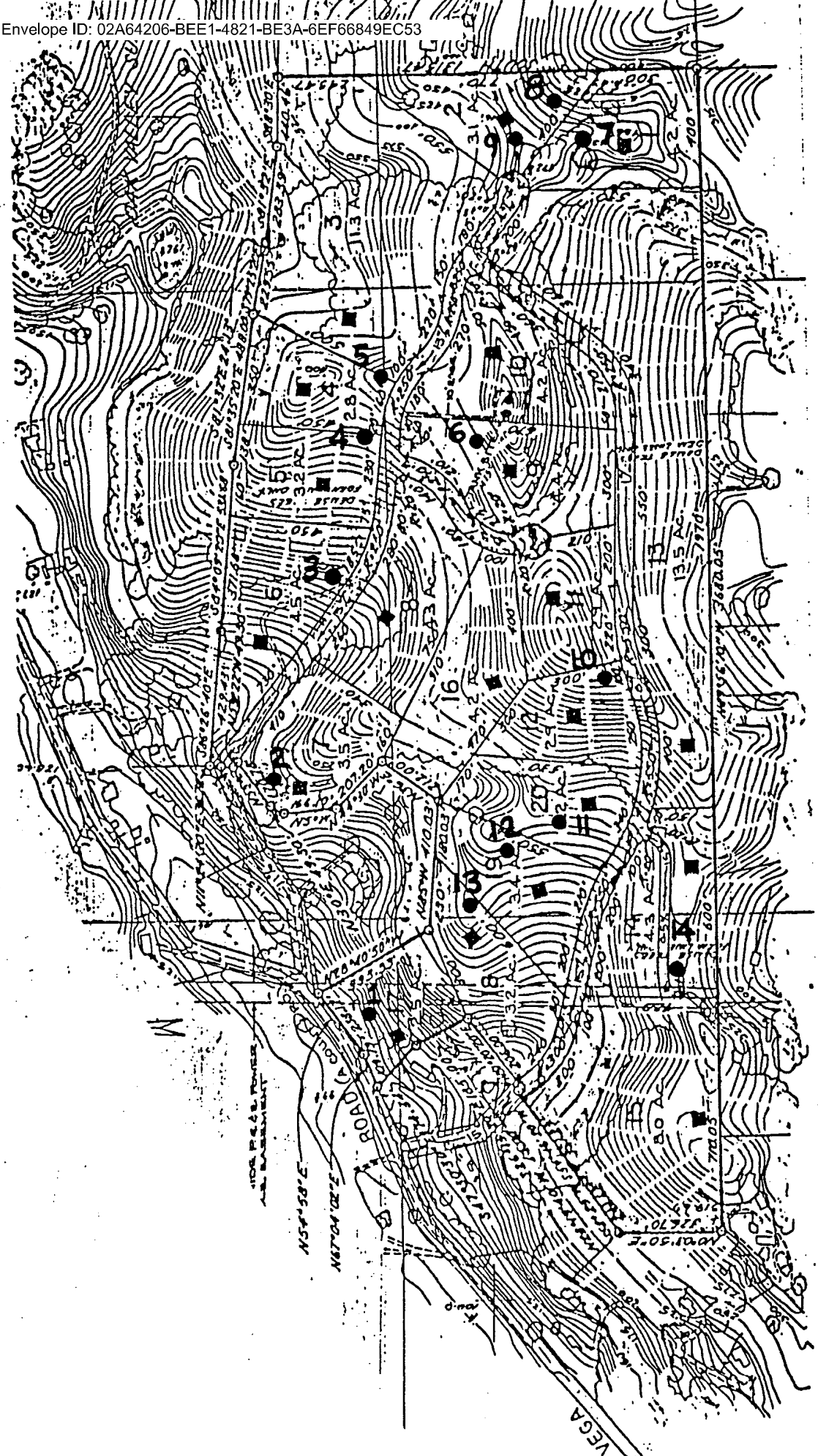

LOCATION OF BORINGS SKETCH MAP

FIGURE NO. 18

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DEPTH IN FEET	SAMPLE NO.	LOG & LOCATION OF SAMPLE	Penetration Resistance Blows/ft	DESCRIPTION Boring No. 1	IN-PLACE DRY DENSITY p.c.f.	IN-PLACE MOISTURE CONTENT % dry wt.
				Ground Elev. = 123		
0				(SM) Brown slightly clayey medium sand - moist, firm		
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12				(CL) Brown sandy clay, moist, soft		
13						
14				Moist		
15				Bottom of Hole No. 1 drilled June 7, 1988 By ENEXCO, Inc. with 6" dia. continuous flight augers		

LOG OF BORING NO. 1

FIGURE NO. 19

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DEPTH IN FEET	SAMPLE NO.	LOG & LOCATION OF SAMPLE	Penetration Resistance Blows/ft	DESCRIPTION	IN-PLACE DRY DENSITY p.c.f.	IN-PLACE MOISTURE CONTENT % dry wt.
				Boring No. 2		
				Ground Elev. = 225		
0				(SM) Tan silty fine sand - dry hard		
1						
2						
3						
4						
5						
6						
7						
8						
9						
10				Hard sandstone, Aromas Formation		
11				Bottom of Hole No. 2 Dry		
12				Boring No. 3 Ground Elev. = 265		
0				(SM) Tan silty fine sand - dry soft		
1						
2						
3						
4				Becoming moist		
5						
6						
7						
8				Increasing moisture		
9						
10						
11						
12						
13						
14				Very moist		
15				Bottom of Hole No. 3		

LOGS OF BORINGS NOS. 2 AND 3

FIGURE NO. 20

DocuSign Envelope ID: 02A64206-BEE1-4821-BE3A-6EF66849EC53

DEPTH IN FEET	SAMPLE NO.	LOG & LOCATION OF SAMPLE	Penetration Resistance Blows/ft	DESCRIPTION	IN-PLACE DRY DENSITY p.c.f.	IN-PLACE MOISTURE CONTENT % dry wt
				Boring No. 4		
				Ground Elev. = 350		
0				(SM) Tan fine-medium silty sand dry, soft		
1						
2						
3				Becoming red clayey sand and sandstone, slightly cemented Aromas Formation		
4						
5						
6						
7						
8						
9						
10						
11				Dry		
12				Bottom of Hole		

LOG OF BORING NO. 4

FIGURE NO. 21

DocuSign Envelope ID: 02A64206-BEE1-4821-BE3A-6EF66849EC53

DEPTH IN FEET	SAMPLE NO.	LOG & LOCATION OF SAMPLE	Penetration Resistance Blows/ft	DESCRIPTION Boring No. 5	IN-PLACE DRY DENSITY p.c.f.	IN-PLACE MOISTURE CONTENT % dry wt
0				(SM) Tan silty sand - dry, dense		
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11				Becoming reddish Aromas Formation, slightly cemented sandstone		
12						
13						
14						
15						
16				Becoming softer		
17						
18						
19						
20						
21						
22						
23						
24				Dry		
25				Bottom of Hole No. 5		

LOG OF BORING NO. 5

FIGURE NO. 22

DocuSign Envelope ID: 02A64206-BEE1-4821-BE3A-6EF66849EC53

DEPTH IN FEET	SAMPLE NO.	LOG & LOCATION OF SAMPLE	Penetration Resistance Blows/ft	DESCRIPTION	IN-PLACE DRY DENSITY p.c.f.	IN-PLACE MOISTURE CONTENT % dry wt.
				Ground Elev. = 400		
0				(SM) Tan silty fine-medium sand-dry, soft		
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11				Dry		
12				Bottom of Hole No. 6		
				Boring No. 7 Ground Elev. = 450		
0				(SM) Red medium sandstone Aromas Formation - dry, hard cemented		
1						
2						
3						
4						
5						
6				Less dense		
7				Dry - Refusal		
8				Bottom of Hole No. 7		

LOGS OF BORINGS NOS. 6 AND 7

FIGURE NO. 23

DocuSign Envelope ID: 02A64206-BEE1-4821-BE3A-6EF66849EC53

DEPTH IN FEET	SAMPLE NO.	LOG & LOCATION OF SAMPLE	Penetration Resistance Blows/ft	DESCRIPTION	IN-PLACE DRY DENSITY p.c.f.	IN-PLACE MOISTURE CONTENT % dry wt
				Boring No. 8		
				Ground Elev. = 440		
0				(SM) Tan silty fine sand - dry soft		
1						
2						
3						
4						
5				Becoming red sandstone Aromas Formation - dry-hard		
6						
7						
8						
9						
10						
11				Bottom of Hoel No. 8 Dry		
12				Boring No. 9 Ground Elev. = 465		
0				(SM) Tan silty sand - dry, loose		
1						
2						
3						
4						
5				(SM) Red clayey dense sand Aromas Formation		
6						
7				Becoming clayey - moist		
8						
9						
10						
11						
12						
13						
14				Hard		
15				Bottom of Hole No. 9 Dry		

LOGS OF BORINGS NOS. 8 AND 9

FIGURE NO. 24

DocuSign Envelope ID: 02A64206-BEE1-4821-BE3A-6EF66849EC53

DEPTH IN FEET	SAMPLE NO.	LOG & LOCATION OF SAMPLE	Penetration Resistance Blows/ft	DESCRIPTION	IN-PLACE DRY DENSITY p.c.f.	IN-PLACE MOISTURE CONTENT % dry wt.
				Boring NO. 10		
				Ground Elev. = 410		
0				(SM) Tan sandy silt		
1						
2						
3						
4						
5						
6				(SM) Red slightly clayey sand Aromas Formation, dry, dense		
7						
8						
9				(SM) Tan silty sand - dry		
10						
11				Red hard sandstone		
12				Bottom of Hole No. 10		

LOG OF BORING NO. 10

FIGURE NO. 25

DocuSign Envelope ID: 02A64206-BEE1-4821-BE3A-6EF66849EC53

DEPTH IN FEET	SAMPLE NO.	LOG & LOCATION OF SAMPLE	Penetration Resistance Blows/ft	DESCRIPTION Boring No. 11	IN-PLACE DRY DENSITY p.c.f.	IN-PLACE MOISTURE CONTENT % dry wt.
				Ground Elev. = 265		
0				(SM) Tan silty fine sand - dry soft		
1						
2						
3						
4						
5						
6				Becoming reddish		
7				Coarser slightly clayey		
8				Aromas Formation		
9						
10				Slightly cemented layer		
11						
12						
13				Moist		
14				Becoming light yellow		
15						
16						
17						
18						
19						
20						
21						
22						
23						
24				Very damp		
25				Bottom of Hole No. 11		

LOG OF BORING NO. 11

FIGURE NO. 26

DocuSign Envelope ID: 02A64206-BEE1-4821-BE3A-6EF66849EC53

DEPTH IN FEET	SAMPLE NO.	LOG & LOCATION OF SAMPLE	Penetration Resistance Blows/ft	DESCRIPTION	IN-PLACE DRY DENSITY pcf.	IN-PLACE MOISTURE CONTENT % dry wt
				Ground Elev. = 250		
0				(SM) Tan medium sand, dry, soft		
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11				Dry		
12				Bottom of Hole No. 12		
				Boring No. 13 Ground Elev. = 250		
0				(SM) Reddish-tan medium sand - dry, soft		
1						
2						
3				Sandstone chips		
4						
5						
6				Becoming coarser, moist		
7						
8						
9						
10						
11				Moist		
12				Bottom of Hole No. 13		

LOGS OF BORINGS NOS. 12 AND 13

FIGURE NO. 27

DocuSign Envelope ID: 02A64206-BEE1-4821-BE3A-6EF66849EC53

DEPTH IN FEET	SAMPLE NO.	LOG & LOCATION OF SAMPLE	Penetration Resistance Blows/ft	DESCRIPTION Boring No. 14	IN-PLACE DRY DENSITY p.c.f.	IN-PLACE MOISTURE CONTENT % dry wt.
				Ground Elev. = 325		
0				(SM) Tan silty fine sand - dry, hard		
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11				Hard Aromas Formation (?)		
12						
13						
14				Dry		
15				Bottom of Hole No. 14		

LOG OF BORING NO. 14

FIGURE NO. 28

DocuSign Envelope ID: 02A64206-BEE1-4821-BE3A-6EF66849EC53

CHARLES A. FISHER, CEEG, INC.
CIVIL ENGINEER - SURVEYOR - GEOLOGIST

JN 88002
July 24, 1988

PERCOLATION TESTS

Boring (no.)	Fall (in.)	Time (hr.)	Rate (in./hr.)	Comments (lots represented)
1	44 (22)	0.93 (0.47)	47*(46)**	Lot 17 @ Vega Road
2	44 (9)	2.67 (0.62)	16 (14)	Lot 7
3	77 (--)	2.30 (--)	33 (--)	Lots 6 & 8
4	-- (33)	-- (0.46)	-- (71)	Lots 4 & 5
5***	90 (55)	2.63 (2.43)	34 (22)	Lots 3, 4 & 10
6	35 (7)	2.72 (1.36)	13 (5)	Lots 9, 11 & 16
7	11 (0)	2.92 (1.35)	4 (0)	Lots 1 & 2
8	31 (2)	2.90 (0.35)	11 (5)	Lots 1 & 2
9	60 (47)	2.96 (1.25)	20 (37)	Lots 1 & 2
10	35 (48)	0.50 (0.95)	70 (50)	Lots 11, 12 & 13
11***	56 (--)	0.68 (--)	82 (--)	Lots 19 & 20
12	NT (38)	NT (2.68)	NT (14)	Lots 18 & 19
13	52 (49)	0.81 (1.08)	64 (48)	Lots 18 & 19
14	30 (NT)	0.60 (NT)	50 (NT)	Lots 14 & 15

LEGEND:

* Tests run June 15, 1988.
** Tests run July 14, 1988.
*** Test hole depth = 25 feet.
Average test hole depth = 12 feet.
Test holes run by falling head method from starting depths of 1 foot average.
(--) Test run to bottom of hole - no rate established.
(NT) Not tested July 14, 1988.

TABLE NO. 1 - PERCOLATION TESTS

DocuSign Envelope ID: 02A64206-BEE1-4821-BE3A-6EF66849EC53

CHARLES A. FISHER, CEEG, INC.
CIVIL ENGINEER - SURVEYOR - GEOLOGIST

JN 88002
July 24, 1988

SEPTIC STUDY RECOMMENDATIONS

Lot	Anticipated Design Infiltration Rate	Special Location Investigation Required		Comments
(no.)	(in./hr.)	Yes	No	
1	4- 5	+		Sandstone 0'-5'
2	5-10	+		Sandstone 5'-20'
3	10-12		+	Good below bldg. site
4	10-15		+	Good below bldg. site
5	15-20		+	Good depth colluvium
6	15-20		+	Good depth colluvium
7	5-10	+		Sandstone 10'
8	10-15		+	Good below bldg. site
9	4- 5	+		May be shal. sandstone
10	4- 5	+		Should be OK below site
11	4- 5	+		Should be Ok below site
12	15-20		+	Good below site
13	10-15		+	Good below site
14	5-10		+	Good below site
15	5-10		+	Good below site
16	10-15		+	Good below site
17	10-15		+	Good depth colluvium
18	15-20		+	Good depth colluvium
19	15-20		+	Good depth colluvium
20	15-20		+	Good depth colluvium

TABLE NO. 2 - SEPTIC STUDY RECOMMENDATIONS

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Exhibit D

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Storesund Consulting
154 Lawson Road, Kensington CA 94707
510-225-5389 (cell) email: rune@storesundconsulting.com

April 27, 2023

Ella Industries
608-B Missouri Street
San Francisco, CA 94107

Attention: Mr. Timothy Moore

Re: Vega Road Project Citation
Restoration Challenges
Watsonville, CA

Dear Mr. Moore:

This letter is in response to your request to evaluate the feasibility of restoring the site conditions to pre-disturbance conditions at the Vega Road project site (APNS: 117471003; 117471004; 117471007; & 117471016). We understand this request is in response to an administrative citation notice received from Monterey County, dated January 14, 2022 related to work performed in the fall of 2021.

Storesund Consulting was engaged in October of 2021 to assist in enhancing stormwater BMPs to stabilize onsite erosion as a result of elevated precipitation events (atmospheric rivers) experienced in October of 2021. Site development design was previously completed by Hogan Land Services, prior to our involvement under a permit initiated (PLN190155) in 2019.

In our opinion, there are three substantive factors that yield restoration of pre-2021 disturbance challenging.

First, the majority of the disturbance centers around the removal of invasive mature Eucalyptus trees. The project arborist (Ono Consultants) prepared an Oak Reforestation and Forest Management Plan (Exhibit A) which aimed to restore the property to a healthy and functioning Oak Woodland as possible. Replanting invasive Eucalyptus in lieu of restoring native Oak Woodland would not only exacerbate forest fire concerns but promote invasive species. Implementation of the proposed project would eliminate onsite invasive species and promote re-establishment of native Oak Woodland. This is the strongly recommended approach. A supportive letter from the project arborist is included in Exhibit B.

Second, re-establishment of onsite woodlands will take many years. This leaves the site vulnerable to enhanced stormwater and sediment runoff. The new proposed site grading will provide installation of a protective covering on the roadway to convey stormwater without erosion/scour of the highly mobile onsite fine sands and silts. Additionally, a series of stormwater infiltration ponds are proposed to be installed (Exhibit C). These infiltration ponds will capture stormwater and encourage controlled infiltration into the underlying soils and groundwater table.

Finally, we were unable to locate site-specific topographic information reliably establishing pre-disturbance conditions throughout the project area. Limited site surveying was completed by Hogan Land Services in 2019. The extents of their surveys are presented in Figure 1. Physical reconstruction of pre-disturbance geometry would be limited to the footprint associated with the Hogan 2019 survey, which is only a portion of the overall surficial site disturbance. The proposed site grading (associated with the current permit application) would also provide enhanced site stability as a result of construction of engineered slopes (especially steeper slope areas, ≥25%).

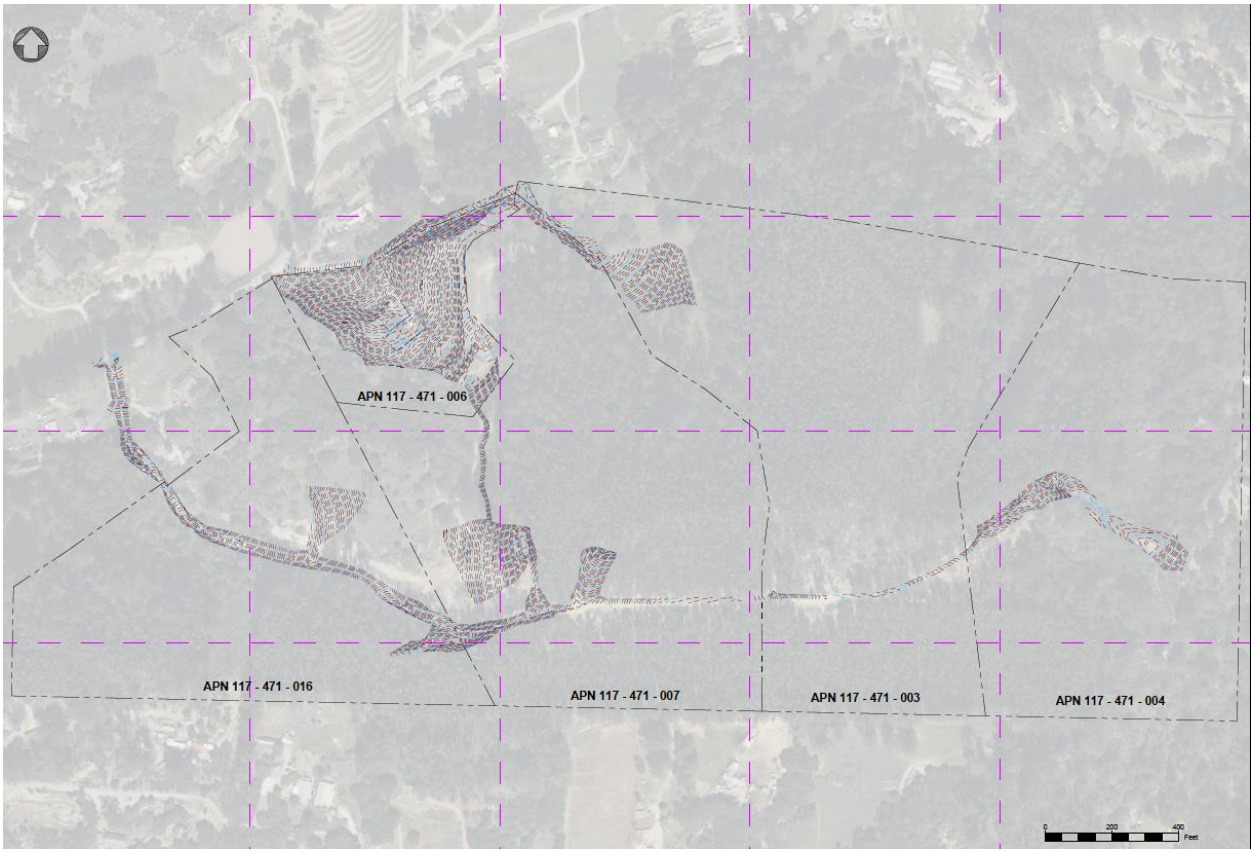


Figure 1: Overview of Hogan survey in 2019. Primarily focused on the existing jeep trail/access road.

Based on interviews of the project owner and review of video/photos of pre-disturbance conditions (Figure 2 through Figure 4) as well as review of available historical imagery (Figure 5 through Figure 14), it is apparent that the properties had an established access road prior to start of the limited grading activities in 2021. It was reported by the property owner that the substantial disturbance activity was the removal of invasive eucalyptus. This appears consistent with the available aerial imagery as well as the assessment of the project arborist (Ono Consulting).

Given the lack of pre-existing topography, and the documented existence of onsite access roads, it would be near impossible to reliably establish pre-disturbance topography and fully 'restore' the site. Additionally, the substantive restoration would consist of replanting the invasive and combustible eucalyptus, which would take decades to mature.

The owners are actively engaged in obtaining the required permits (resubmittal initiated in May 2022) and all site work (as of fall 2021), except maintenance of stormwater BMPs, has terminated until all permits have been secured. The proposed work will be a substantial improvement over the

existing conditions in that the work will include replanting of native oak trees, stabilization of the disturbed highly erodible onsite silts and fine sands, and includes formal, long-term stormwater management detention and infiltration basins to employ nature-based solutions for stormwater runoff. The proposed improvements would only take a season or two to fully implement.

Figure 2: Screen capture of video taken by property owner in 2020 showing existing jeep trail/access road (36.886575N; 121.716222W, looking west).

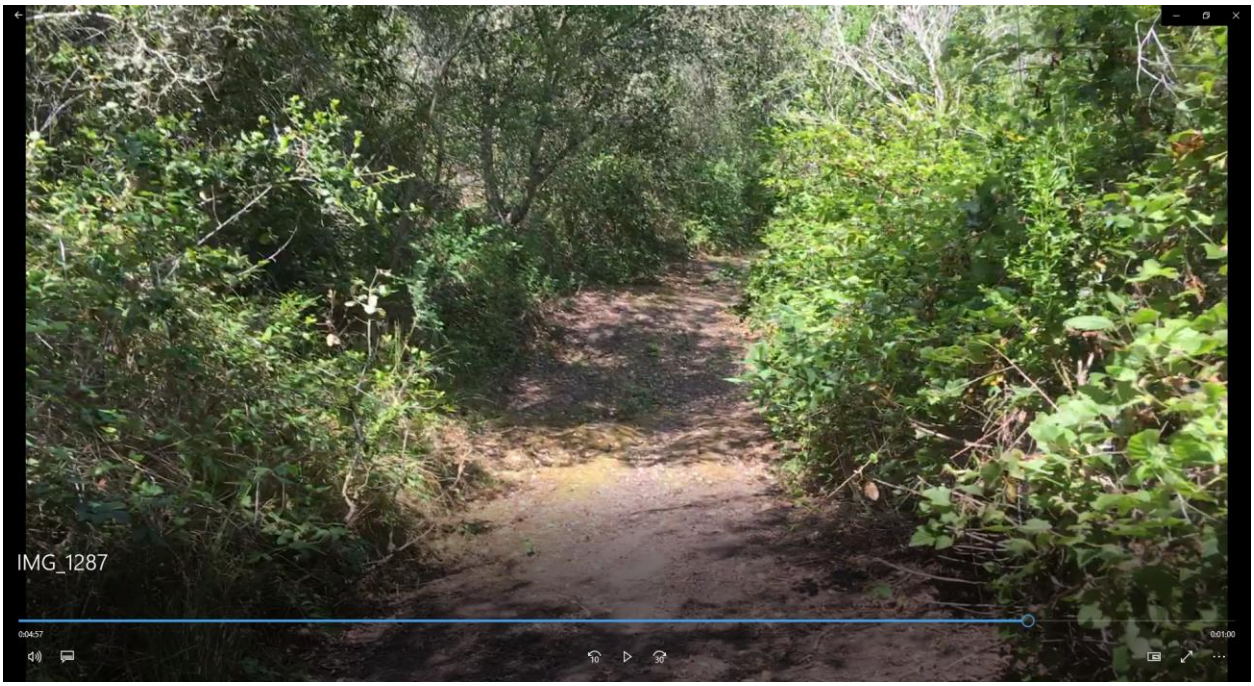


Figure 3: Screen capture of video taken by property owner in 2020 showing existing jeep trail/access road (36.887049N; 121.719776W, looking northwest).

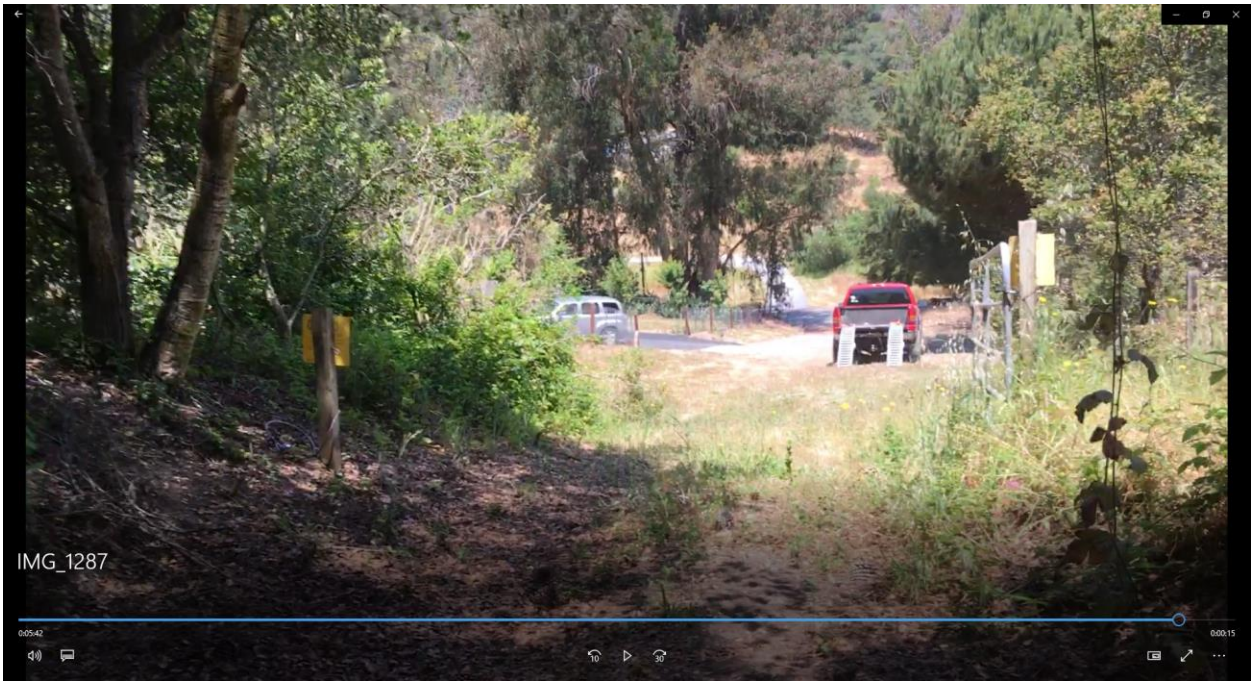


Figure 4: Screen capture of video taken by property owner in 2020 showing existing jeep trail/access road at the northern access point to Vega Road via the existing easement with adjacent neighbors (36.887727N; 121.720653W, looking north).

Figure 5: Aerial image from UCSB's Frame Finder showing site conditions in 1931. Vega Road is visible, but no observable development within the properties.

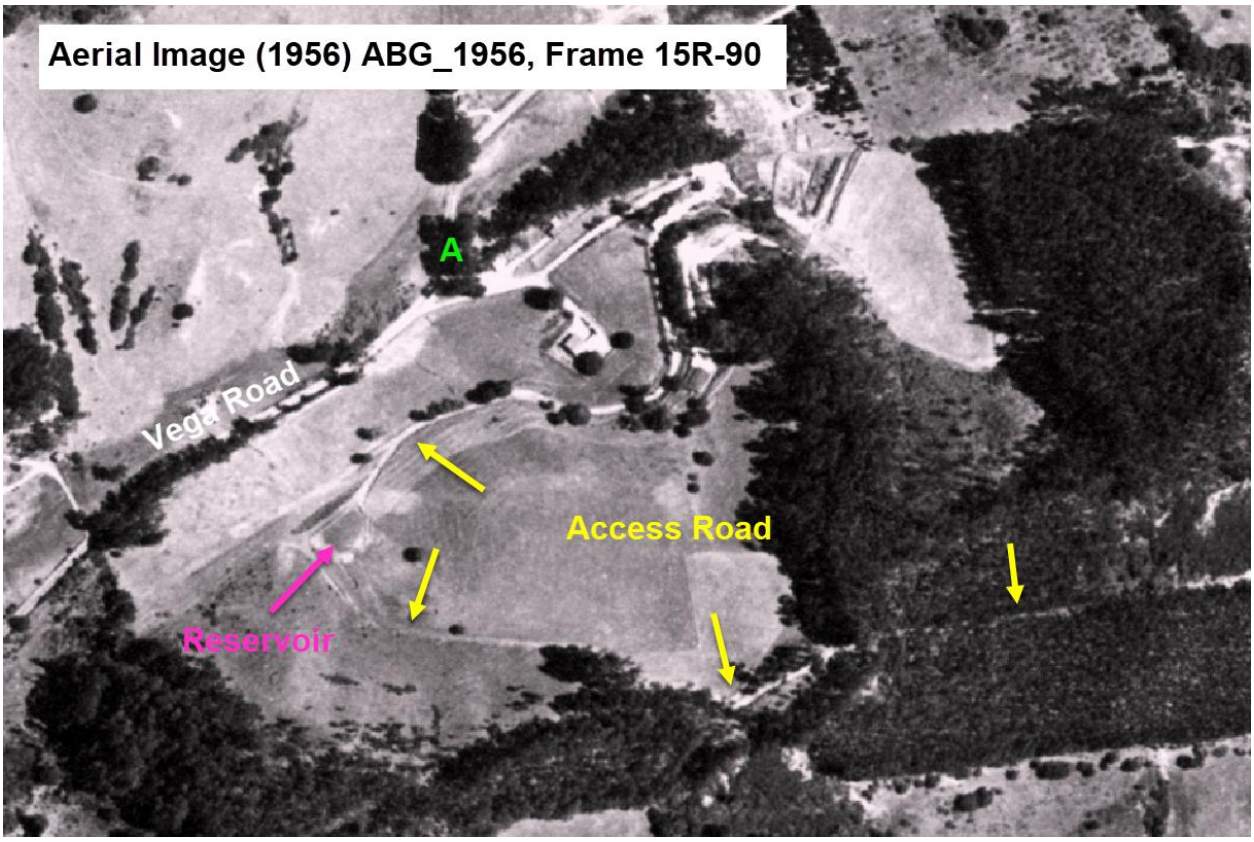


Figure 6: Aerial image from UCSB's Frame Finder showing site conditions in 1956. A residence has been constructed as well as a reservoir and access roads that traverse the property.

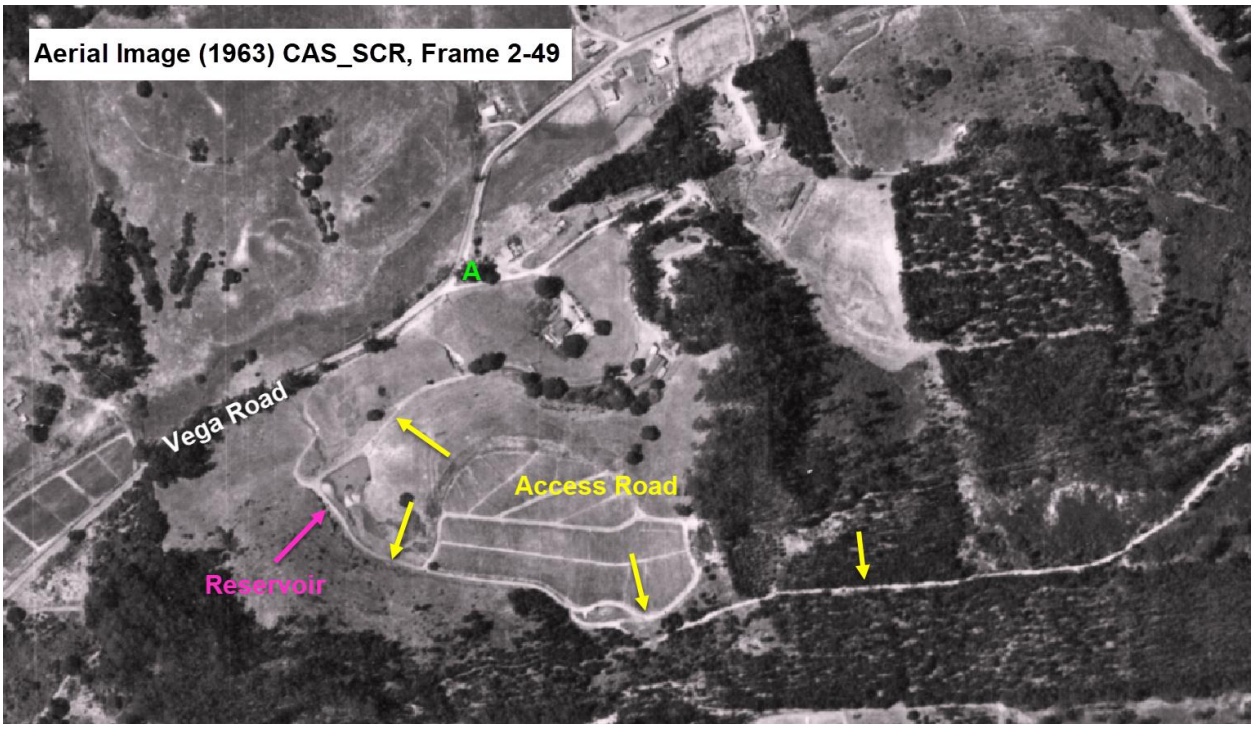


Figure 7: Aerial image from UCSB's Frame Finder showing site conditions in 1963. Access roads that traverse the property have been expanded.

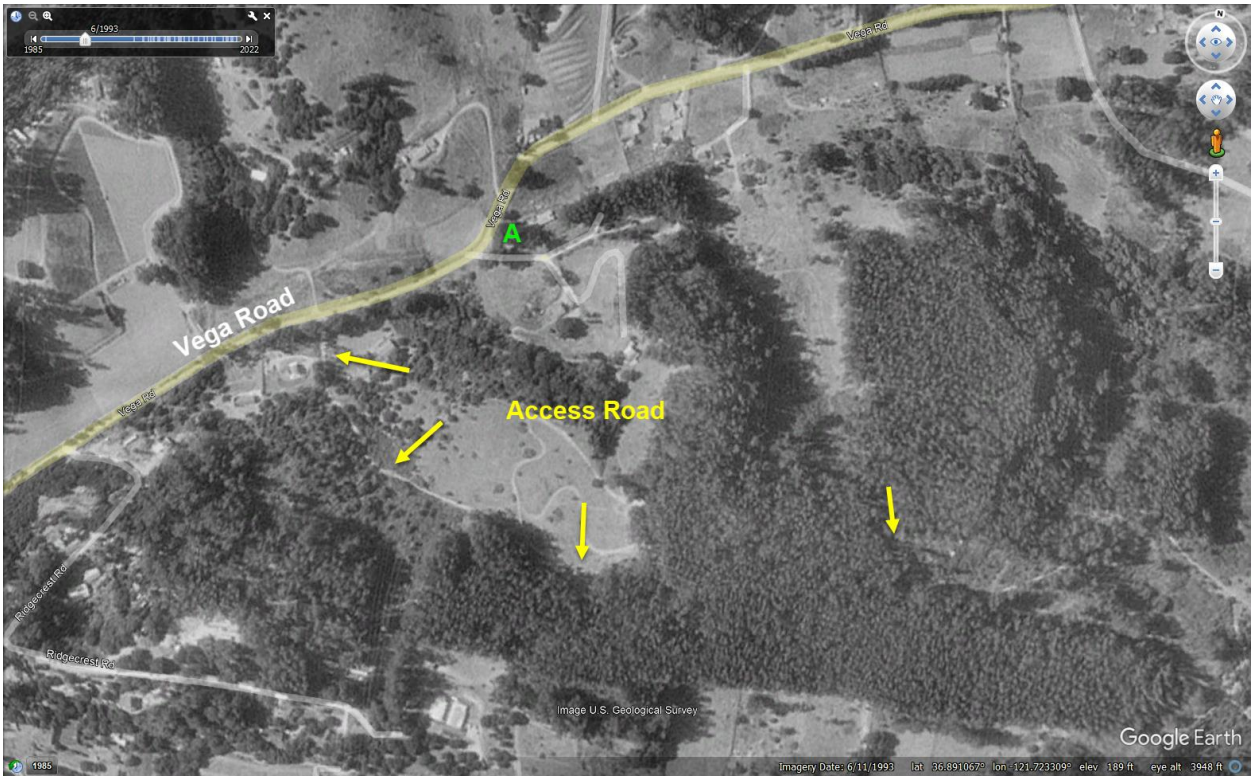


Figure 8: Aerial imagery from Google Earth showing site conditions in 1993. Formal connection to Vega Road in between the two new parcels (132 Vega Road and 136 Vega Road) is visible, likely established in late 1970s/early 1980s during development of 132 Vega Road and 136 Vega Road. Images between 1963 and 1993 were not readily available.

Figure 9: Aerial imagery from Google Earth showing site conditions in 2005.

Figure 10: Southward looking view from Vega Road via Google Street View showing the unimproved access road via the access road to 132 and 136 Vega Road.

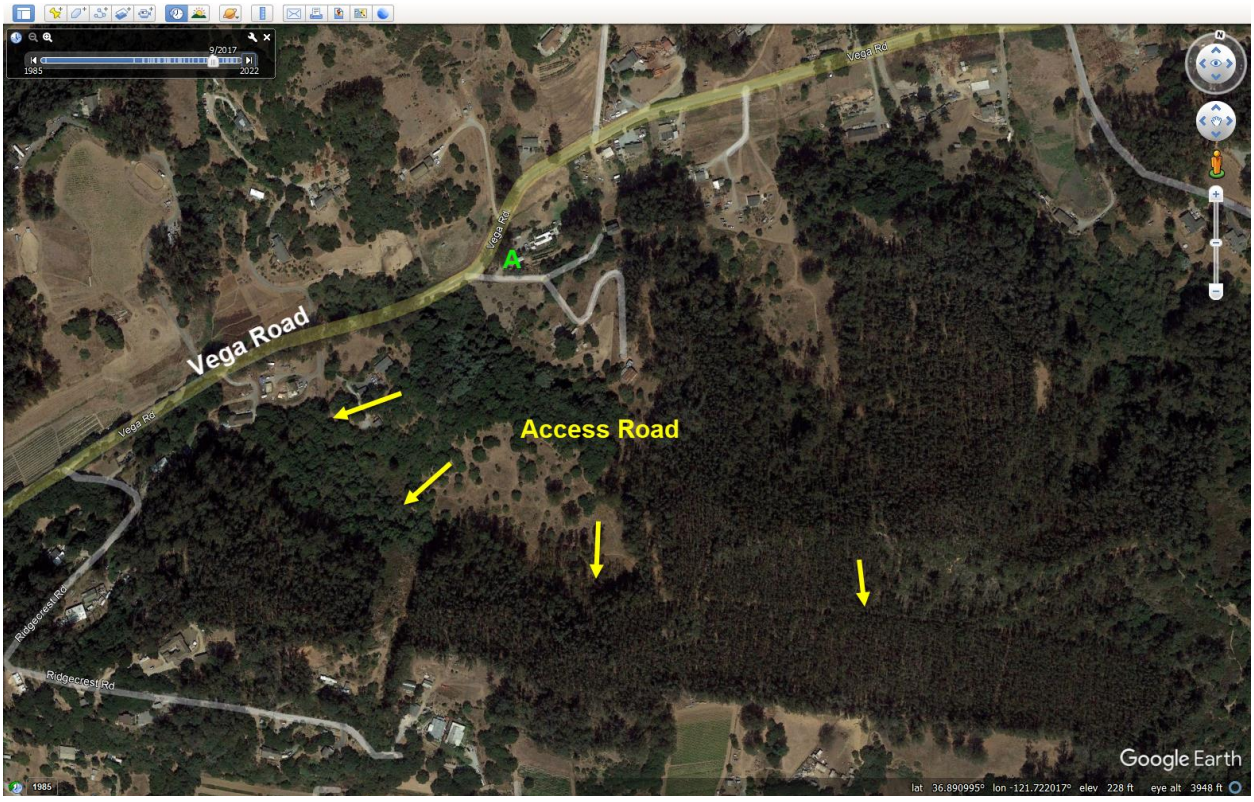


Figure 11: Aerial imagery from Google Earth showing site conditions in 2017.

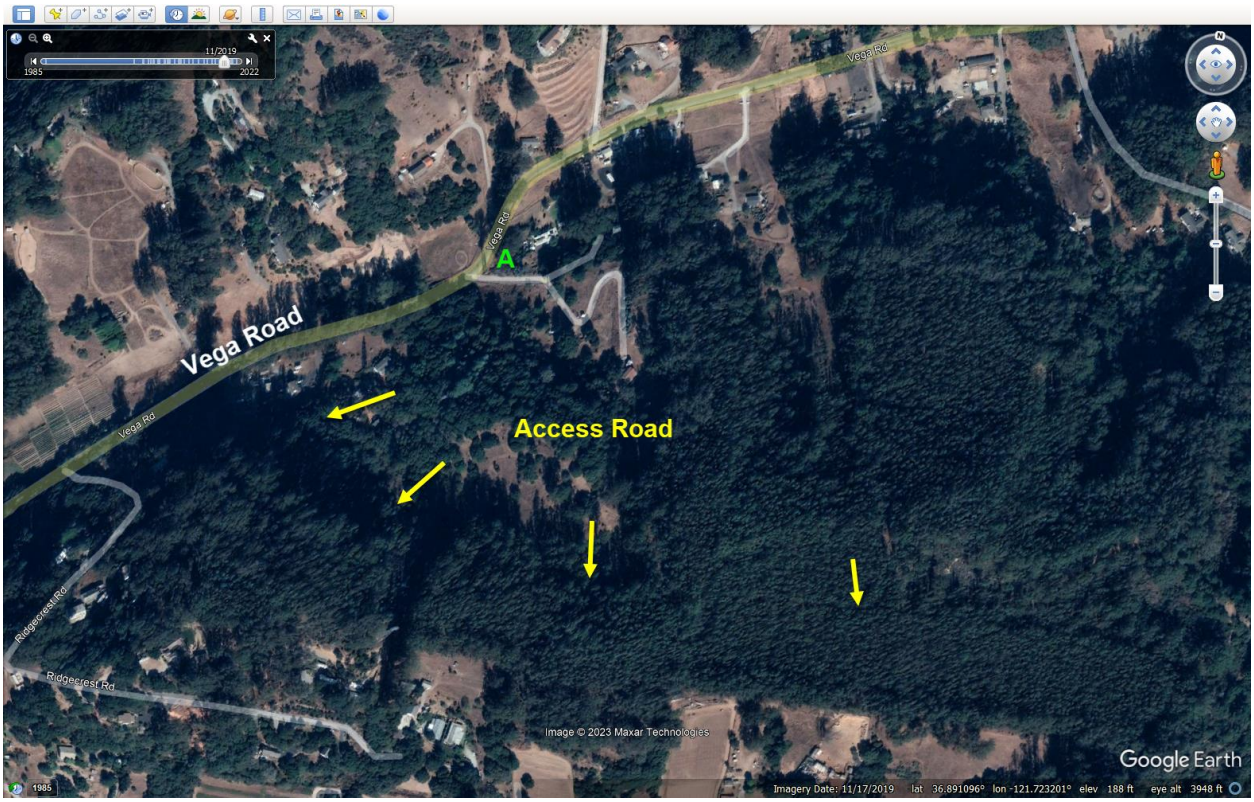


Figure 12: Aerial imagery from Google Earth showing site conditions in 2019.

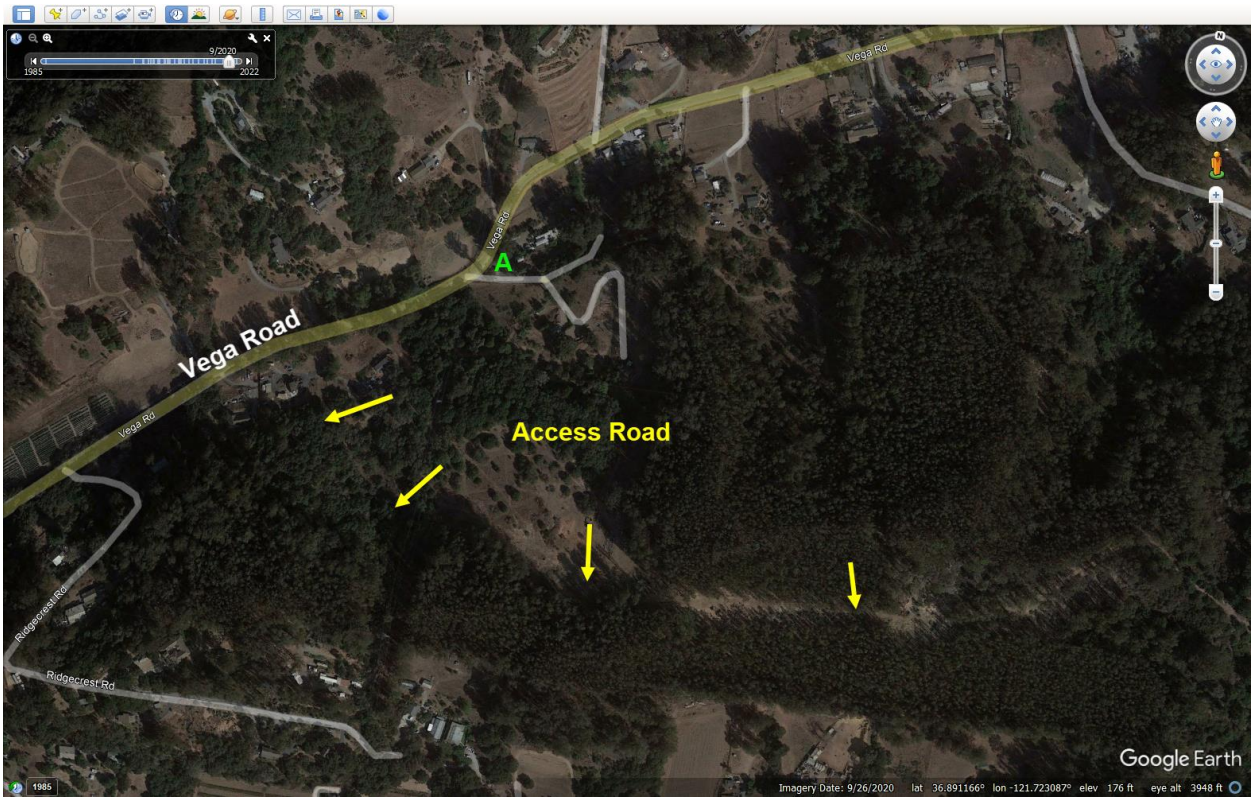


Figure 13: Aerial imagery from Google Earth showing site conditions in 2020.

Figure 14: Westward-looking aerial oblique taken in October 2021 by R. Storesund showing site work consisting primarily of eucalyptus removal via pre-existing access roads.

Limitations

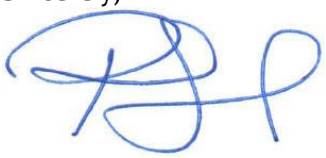
Our services consist of professional opinions, conclusions, and recommendations that are made in accordance with generally accepted engineering principles and practices. This warranty is in lieu of all other warranties, either expressed or implied.

Reliance on this letter by others must be at their risk unless we are consulted on the use or limitations. We cannot be responsible for the impacts of any changes in standards, practices, or regulations subsequent to performance of services without our further consultation. We can neither vouch for the accuracy of information supplied by others, nor accept consequences for un-consulted use of segregated portions of this document.

Closure

We appreciate the opportunity to be of continued service. Please feel free to contact me with any questions or comments regarding the information presented in this report via phone (510) 526-5849 or email (rune@storesundconsulting.com).

Sincerely,



Rune Storesund, D.Eng., P.E., G.E.
Consulting Engineer

Storesund Consulting
154 Lawson Road, Kensington CA 94707
510-225-5389 (cell) email: rune@storesundconsulting.com

EXHIBIT A

Ono Consulting

International Society of Arboriculture
Certified Arborist #WE-0536A
Board Certified Master Arborist #WE-9388B
ASCA Registered Consulting Arborist #744
Society of American Foresters Professional Members
311 Forest Ave, Box 14
Pacific Grove CA, 93950
Telephone (831) 373-7086

March 8, 2022

Ella Industries Inc
C/O Casey Marsh
608 B Missouri St
San Francisco CA 94107

RE: Oak Restoration and Forest Management Plan – 146 Vega Road
APNs: 117-471-003-000, 117-471-004-000, 117-471-006-000. 117-471-007-000, and 117-471-016-000

Mr. Marsh;

We were Contacted by Mr. Rune Storesund who requested that we visit the above-referenced property (located at 146 Vega Road, Royal Oaks, CA 95076) to observe the site and forested conditions. Development in the form of a new road and the installation of a water system to serve five (5) future homes is proposed under county permit PLN190155 and construction are underway. During the County's inspection of the property, they raised concerns about tree removal on-site, specifically Heritage Eucalyptus and Monterey pine trees. We were asked to prepare a report addressing the removal of eucalyptus trees and provide recommendations to help transition the former eucalyptus plantation back to natural oak woodland. The following report contains our observations and recommended plan of action.

Sincerely,

Frank Ono
Certified Arborist #WE-0536A
ISA Tree Risk Assessment Qualified
Society of American Foresters # 048004

Justin Ono
ISA Board Certified Master Arborist #WE-9388B
ASCA Registered Consulting Arborist #744
ISA Tree Risk Assessment Qualified

Oak Restoration/
Forest Management Plan
146 Vega Road

Prepared by Ono Consulting
311 Forest Ave, Box 14
Pacific Grove, CA 93950

ASSIGNMENT/SCOPE OF WORK

I was asked to assess a stand of Eucalyptus trees located across the four parcels that comprise 146 Vega Road, Royal Oaks, CA 95076. The assignment is to determine a course of action to remove the existing Eucalyptus trees planted in a row plantation layout and transition the properties back to a native oak woodland environment.

LIMITATIONS

This assignment is limited to the review of surveys submitted to me by dated May 9, 2019, to assess the proposed road and onsite vegetation conditions. The assessment has been made of these plans specifically and no other plans were reviewed. Ono Consulting and its representatives are not designers, engineers, or surveyors and this report is explicitly based on the plans given to us. Only minor grading and erosion details are discussed in this report as it relates to tree health. It is not the intent of this report to be a monetary valuation of the trees or provide a risk assessment for any tree on this parcel, as any tree can fail at any time. No clinical diagnosis was performed on any pest or pathogen that may or may not be present. In addition to an inspection of the property, Ono Consulting relied on information provided in the preparation of this report (such as surveyed tree sizes, property boundaries, and property ownership) and must reasonably rely on the accuracy of the information provided. Ono Consulting shall not be responsible for another's means, methods, techniques, schedules, sequence or' procedures, or for contractor safety or any other related programs; or another's failure to complete the work per the plans and specifications.

BACKGROUND

We were contacted by Mr. Storesund after he was contracted by the owners to help with a grading permit for the properties. During the initial permit fact-finding process, the County of Monterey observed recent tree removal and related activities adjacent to the road being developed on the property. The county asked for a forest restoration/management plan to identify trees being removed and to ensure protected trees were not removed without county permits. Protected trees in the North County Land Use Plan include Coast live oak (*Quercus agrifolia*), Valley oak (*Quercus lobata*), Willows (*Salix spp.*), Black cottonwood (*Populus trichocarpa*), Fremont cottonwood (*Populus fremontii*), California sycamore (*Platanus racemosa*), Toyon (*Heteromeles arbutifolia*), Chinquapin (*Castanea pumila*), Madrone (*Arbutus menziesii*), California buckeye (*Aesculus californica*), California box elder (*Acer negundo*), and Bigleaf maple (*Acer macrophyllum*). Monterey pines (*Pinus radiata*) and Bluegum Eucalyptus (*Eucalyptus globulus*) trees over 36-inches in diameter are also considered Landmark trees are protected by the county. We have been requested to prepare a forest restoration/management plan for the identified removed trees. The plan is prepared to utilize strategies to bring the site back to pre-plantation levels of native tree coverage, and a more natural and native landscape.

SITE CONDITIONS

1) APNs: 117-471-003-000, 117-471-004-000, 117-471-006-000. 117-471-007-000, and 117-471-016-000.

2) Parcel sizes: 29.2, 22.08, 5.86, 27.58, and 21.23 Acres.

3) Existing Land Use: The parcels are zoned for low-density residential use.

4) Slope: The parcels are located along a ridge. Slopes range from 2 to over 25%.

5) Soils: The parcel is located on Arnold loamy sand and Arnold-Santa Ynez complex soil about 65-inches deep. Weathered sandstone bedrock is found generally at a depth of 48-79-inches. Runoff is low on the Arnold series soils and very high in the Santa Ynez soils. Erosion hazard is low to moderate. The majority of the parcels sit on Arnold loamy sand with a small finger in the southeast corner of the properties of Arnold-Santa Ynez complex.

6) Current Site Conditions and Former Woodland Nature: The area and surrounding landscape was historically managed as a rural residential community comprised of scattered oak woodlands with small farming and livestock production. The native vegetation is of an oak woodland type with scattered Coast live oak trees with an understory of native shrubs such as Poison oak (*Toxicodendron diversilobum*), Sticky Monkey flower (*Mimulus aurantiacus*), and Manzanita (*Arctostaphylos spp*). The area in and around the site is heavily populated by the introduced blue gum eucalyptus trees (*Eucalyptus globulus*) with invasive understory weeds including, Pampas grass (*Cortaderia selloana*), and Himalayan blackberry (*Rubus armeniacus*). The proposed road construction is currently underway, and several smaller eucalyptus trees have been removed and their root balls dug up and masticated.

OBSERVATIONS

The following are observations taken on site:

- The site was planted as a Eucalyptus plantation as was evidenced by uniform row crop planting 10 to 20-feet on center. Over 60% of the parcels' acreage is taken up by eucalyptus planting. In the densest areas, 200-400 trees per acre were calculated.
- The existing Eucalyptus trees appear to have been harvested two to three times with multi-clustered stems ranging from 10-24-inches in diameter.
- Trees removed for roadway construction are all Eucalyptus under 30-inches in diameter.
- Very little native vegetation was observed around the planted eucalyptus trees due to Allelopathy.
- Along the road, in parcel 117-471-003-000 there is a small stand of Coast live oak trees in poor condition.
- Eucalyptus logs, both large and small cut pieces were left on site in piles.
- Only two (2) heritage Eucalyptus trees (greater than 36-inches in diameter) were observed on the sites. One in the clearing in parcel 117-471-003-000 upslope from the declining oak stand, and one off the road in parcel 117-471-004-000 where the landscape transitions from eucalyptus to more native plantings.

DISCUSSION

The site was evaluated by looking at specific characteristics and establishing a benchmark to formulate an Oak Woodland site restoration plan as follows:

Restoration Strategy

To restore the property as much to a healthy and functioning Oak Woodland as possible, the following actions must be taken. The first and most important goal is to remove and eradicate the existing Eucalyptus plantation while retaining enough plant coverage for soil stability. The second major goal is to reestablish the Oak canopy cover to promote native plant growth creating a condition similar to the pre-Eucalyptus woodlands. These goals can be accomplished through the following:

1. Remove Eucalyptus stump sprouts and treat with a woody herbicide to reduce the regrowth and allow space for planting new trees.
2. Eucalyptus stumps should be left in a mosaic pattern until their removal is necessary for development and/or proper native plant cover has been established to reduce the risk of erosion.
3. If Eucalyptus stumps are to be mechanically removed, a soil or grading erosion specialist will need to be consulted to avoid the risk of erosion.
4. The small number of landmark Eucalyptus trees observed can remain on site as they are outside of development areas. If the trees are proposed to be removed later, oak reforestation efforts will mitigate the removal of the landmark Eucalyptus.
5. Re-establish appropriate oak species in areas that did or could have supported oak woodlands previously and are now capable of supporting this vegetation type.
6. Manage remnant oak woodlands and restored stands to permit natural regeneration and maximize the cover and dominance of indigenous plant species while minimizing the cover of nonindigenous species and weeds outside of scenic easements.
7. Rehabilitate vigorously sprouting stumps and naturally recruited oak seedlings by pruning them to re-establish dominant canopies and regain proper structure through crown restoration.

RESTORATION PLAN

Restoration Action Plan

The following steps need to be implemented immediately to have success in site restoration;

1. The existing Eucalyptus trees will need to be removed or cut into logs and stacked, allowing growing space for replanted oak trees and reducing fuel load on the ground.
2. Downed Eucalyptus bark and leaves need to be removed to open up growing space and reduce fine fuels.
3. The Himalayan Blackberry and other invasive plants should be mowed and controlled to allow for a minimum of competition for the emerging oak seedlings.
4. Re-sprouting Eucalyptus stumps shall be treated with herbicide to prevent any sprouting of new trees, with stumps flush cut and left in the ground for slope stabilization.

5. Existing oak seedling/sapling identification should occur after the Eucalyptus logs are removed in case smaller seedlings are damaged during the tree work and mowing.
6. Whether trees are transplanted on-site or planted from nursery stock individual seedlings should not be planted within 10 feet of other seedlings, sprouted stumps, or mature trees.
7. Seedling/saplings will likely need to be hand-watered during the spring and summer months after planting, particularly if dry conditions prevail. Drip irrigation on an automatic timer is highly advised. Soils should be damp at the time of planting and during the initial establishment period for the juvenile oak trees.

Planting Guidelines

Indigenous acorns from the properties should be collected in the Fall months when the nuts are mature. Seedlings can be propagated on-site, or by a local native plant nursery for the landowners. Acorns should be started in tall 1-gallon tree pots to promote root growth and viable seedlings should be out-planted during fall months before the onset of winter rain. Seedling development could take more than one growing season before the juvenile oaks are ready to be out planted. Ideally, acorns will be collected in Fall 2018 and seedlings out planted in late Fall 2019 or Winter 2020.

Individual seedlings should not be planted within 10 feet of other seedlings or mature oak trees. To recreate the pre-disturbance woodland the seedlings should be planted at a spacing of 15 – 25-feet on center to establish a tree count of 70-190- trees per acre to account for mortality and future thinning. Trees can be planted in clusters of 2-3 to mimic the natural multi-stemmed clusters of the oaks in the native region. A Certified Arborist or qualified forester should supervise the placement of seedling trees for the landowners.

Tree Shelters for Seedlings

Seedlings should be planted in tree shelter cages to deter animal browsing, and each seedling should be marked and numbered for easy identification. A regular maintenance and monitoring program should be implemented by the landowners to maintain the area around each juvenile oak in a weed-free condition. Invasive annual grasses and thistles should be removed from the areas directly adjacent (within five to six feet) around newly planted seedlings.

Success Criteria and Monitoring Schedule

Seedlings should be monitored regularly by the landowners and any signs of herbivory or weakness addressed immediately. A qualified Forester or Arborist should inspect the planted or regenerated trees annually after the seedlings are installed to ensure trees survival. Trees that have died should be replaced up to a threshold agreed upon by the forester and the landowners.

To help ensure the survivability and proper growth of planted replacement trees, a qualified professional (Monterey County approved Certified Arborist or forester) should assess the following

- Tree health and growth rates of new or relocated planting.
- Trees suffering poor growth rates or declining health are to be identified and documented as to the reason it was not successful.
- Invigoration Treatments will be recommended and implemented if deemed feasible.
- Dead trees or trees identified in an irreversible state of decline will be replaced after a written recommendation is made by a qualified forester or Certified Arborist identifying the type and location of replacement.

Tree Removal and Bird Habitat

During Eucalyptus tree removal, the contractor shall verify absence of active animal or bird nesting sites prior to any work. If any active animal or bird nesting sites are found prior to tree removal, work shall be stopped until a qualified biologist is consulted for further recommendations.

Tree Pruning

Future pruning of county protected trees shall conform to the following standards:

- Clear the crown of diseased, crossing, weak, and dead wood to a minimum size of 1-1/2 inch in diameter;
- Remove stubs, cutting outside the wound wood tissue that has formed around the branch;
- Interior branches shall not be stripped out.
- Reduce end weight on heavy, horizontal branches by selectively removing small-diameter branches, no greater than 3 inches, near the ends of the scaffolds. In some cases, larger diameters may be removed depending on the situation (where critical for safety).
- Pruning cuts larger than 4 inches in diameter, except for deadwood, shall be avoided, unless deemed crucial for safety (broken, cracked, crossing, rubbing, etc.).
- Pruning cuts that expose heartwood shall be avoided whenever possible.
- Pruning shall not be performed during periods of flight of adult boring insects because fresh wounds attract pests (generally spring). Pruning shall be performed only when the danger of infestation has passed.

- All pruning shall be performed by a qualified arborist or under the supervision of an ISA Certified Arborist or Tree Worker. Arborists are required to have a State of California Contractors License for Tree Service (C-61/D49) and provide proof of worker's compensation and general liability insurance.
- All pruning shall be per the Tree Pruning Guidelines (International Society of Arboriculture) and/or the ANSI A300 Pruning Standard (American National Standard for Tree Care Operations) and adhere to the most recent edition of ANSI Z133.1.
- No more than 20 percent of live foliage shall be removed from the trees.
- Brush shall be chipped, and chips shall be spread underneath trees within the tree protection zone to a maximum depth of 6 inches, leaving the trunk clear of mulch.

Fire Defensible Space (PRC 4291 Amended January 1, 2021)

California's Department of Forestry and Fire Protection (CalFire) has instituted a set of rules and guidelines for vegetation management and fire safety for homes in the wildland-urban interface (WUI). These rules have been adopted to reduce the fuels around homes and allow firefighters a better chance to combat the increasing wildfires that have been occurring in California. Although there are no structures currently planned for the parcels at 146 Vega Road, fuel management procedures should be taken in accordance to California Public Resource Code to ensure proper fire defensibility of the sites. The law (Public Resource Code 4291) is as follows.

(a) A person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material, shall at all times do all of the following:

(1) (A) Maintain defensible space of 100 feet from each side and from the front and rear of the structure, but not beyond the property line, except as provided in subparagraph (B). The amount of fuel modification necessary shall consider the flammability of the structure as affected by building material, building standards, location, and type of vegetation. Fuels shall be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. This subparagraph does not apply to single specimens of trees or other vegetation that are well-pruned and maintained so as to effectively manage fuels and not form a means of rapidly transmitting fire from other nearby vegetation to a structure or from a structure to other nearby vegetation. The intensity of fuels management may vary within the 100-foot perimeter of the structure, with more intense fuel reductions being utilized between 5 and 30 feet around the structure, and an ember-resistant zone being required within 5 feet of the structure, based on regulations promulgated by the board, in consultation with the department, to consider the elimination of materials in the ember-resistant zone that would likely be ignited by embers. The promulgation of these regulations by the board is contingent upon an appropriation by the Legislature in the annual Budget Act or another statute for this purpose. Consistent with fuels management objectives, steps should be taken to minimize erosion. For the purposes of this subparagraph, "fuel" means any combustible material, including petroleum-based products and wildland fuels.

(B) A greater distance than that required under subparagraph (A) may be required by state law, local ordinance, rule, or regulation. Clearance beyond the property line may only be required if the state law, local ordinance, rule, or regulation includes findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of

wildfire to the structure. Clearance on adjacent property shall only be conducted following written consent by the adjacent landowner.

(C) An insurance company that insures an occupied dwelling or occupied structure may require a greater distance than that required under subparagraph (A) if a fire expert, designated by the director, provides findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. The greater distance may not be beyond the property line unless allowed by state law, local ordinance, rule, or regulation.

(2) Remove that portion of a tree that extends within 10 feet of the outlet of a chimney or stovepipe.

(3) Maintain a tree, shrub, or other plant adjacent to or overhanging a building free of dead or dying wood.

(4) Maintain the roof of a structure free of leaves, needles, or other vegetative materials.

(5) Before constructing a new building or structure or rebuilding a building or structure damaged by a fire in an area subject to this section, the construction or rebuilding of which requires a building permit, the owner shall obtain a certification from the local building official that the dwelling or structure, as proposed to be built, complies with all applicable state and local building standards, including those described in subdivision (b) of Section 51189 of the Government Code, and shall provide a copy of the certification, upon request, to the insurer providing course of construction insurance coverage for the building or structure. Upon completion of the construction or rebuilding, the owner shall obtain from the local building official, a copy of the final inspection report that demonstrates that the dwelling or structure was constructed in compliance with all applicable state and local building standards, including those described in subdivision (b) of Section 51189 of the Government Code, and shall provide a copy of the report, upon request, to the property insurance carrier that insures the dwelling or structure.

(b) A person is not required under this section to manage fuels on land if that person does not have the legal right to manage fuels, nor is a person required to enter upon or to alter property that is owned by any other person without the consent of the owner of the property.

(c) (1) Except as provided in Section 18930 of the Health and Safety Code, the director may adopt regulations exempting a structure with an exterior constructed entirely of nonflammable materials, or, conditioned upon the contents and composition of the structure, the director may vary the requirements respecting the removing or clearing away of flammable vegetation or other combustible growth with respect to the area surrounding those structures.

(2) An exemption or variance under paragraph (1) shall not apply unless and until the occupant of the structure, or if there is not an occupant, the owner of the structure, files with the department, in a form as the director shall prescribe, a written consent to the inspection of the interior and contents of the structure to ascertain whether this section and the regulations adopted under this section are complied with at all times.

(d) The director may authorize the removal of vegetation that is not consistent with the standards of this section. The director may prescribe a procedure for the removal of that vegetation and make the expense a lien upon the building, structure, or grounds, in the same manner that is applicable to a legislative body under Section 51186 of the Government Code.

(e) (1) The board, in consultation with the department, shall develop, periodically update, and post on its internet website a guidance document on fuels management pursuant to this chapter. The guidance document shall include, but not be limited to, regionally appropriate vegetation

management suggestions that preserve and restore native species that are fire resistant or drought tolerant, or both, minimize erosion, minimize water consumption, and permit trees near homes for shade, aesthetics, and habitat; and suggestions to minimize or eliminate the risk of flammability of nonvegetative sources of combustion such as woodpiles, propane tanks, decks, and outdoor lawn furniture.

(2) On or before January 1, 2023, the board, in consultation with the department, shall update the guidance document to include suggestions for creating an ember-resistant zone within five feet of a structure, based on regulations promulgated by the board, in consultation with the department, to consider the elimination of materials in the ember-resistant zone that would likely be ignited by embers. The implementation of this paragraph is contingent upon an appropriation by the Legislature in the annual Budget Act or another statute for this purpose.

(f) (1) The department shall do both of the following:

(A) Recommend to the board the types of vegetation or fuel that are to be excluded from an ember-resistant zone based on the probability that vegetation and fuel will lead to ignition by ember of a structure as a part of the update to the guidance document pursuant to paragraph (2) of subdivision (e).

(B) Make reasonable efforts to provide notice to affected residents describing the requirements added by the amendments to paragraph (1) of subdivision (a) made in Assembly Bill 3074 of the 2019–20 Regular Session before the imposition of penalties for violating those requirements.

(2) The implementation of this subdivision is contingent upon an appropriation by the Legislature in the annual Budget Act or another statute for this purpose.

(g) (1) The requirement for an ember-resistant zone pursuant to paragraph (1) of subdivision (a) shall not take effect for new structures until the board updates the regulations, pursuant to paragraph (1) of subdivision (a), and the guidance document, pursuant to paragraph (2) of subdivision (e).

(2) The requirement for an ember-resistant zone pursuant to paragraph (1) of subdivision (a) shall take effect for existing structures one year after the effective date for the new structures.

(h) The department shall not change defensible space inspection practices and forms or enforcement to implement the requirement for an ember-resistant zone until the director makes a written finding, which the director shall post on the department's internet website, that the Legislature has appropriated sufficient resources to do so.

(i) For purposes of this section, a structure for the purpose of an ember-resistant zone shall include any attached deck. This section does not limit the authority of the board or the department to require the removal of fuel or vegetation on top of or underneath a deck pursuant to this section.

(j) As used in this section, "person" means a private individual, organization, partnership, limited liability company, or corporation.

Detailed descriptions of the firebreaks described in section (A) and (B) of Public Resource Code 4291. These spacings are to be used in and around home sites.

Zone 1

Zone 1 extends 30 feet out from buildings, structures, decks, etc.

- Maintain a non-combustible zone 0-5 feet from structures.
- Remove all dead plants, grass and weeds (vegetation).
- Remove dead or dry leaves and pine needles from your yard, roof and rain gutters.
- Trim trees regularly to keep branches a minimum of 10 feet from other trees.
- Remove branches that hang over your roof and keep dead branches 10 feet away from your chimney.
- Relocate wood piles into Zone 2.
- Remove or prune flammable plants and shrubs near windows.
- Remove vegetation and items that could catch fire from around and under decks.
- Create a separation between trees, shrubs and items that could catch fire, such as patio furniture, wood piles, swing sets, etc.

Zone 2

Zone 2 extends 100 feet out from buildings, structures, decks, etc.

- Cut or mow annual grass down to a maximum height of 4 inches.
- Create horizontal spacing between shrubs and trees.
- Create vertical spacing between grass, shrubs and trees.
- Remove all dead trees.
- Remove fallen leaves, needles, twigs, bark, cones, and small branches. However, they may be permitted to a depth of 3 inches.

Thank you and please feel free to contact us if you have any questions.

Sincerely,

Frank Ono
Certified Arborist #WE-0536A
ISA Tree Risk Assessment Qualified
Society of American Foresters # 048004

Justin Ono
ISA Board Certified Master Arborist #WE-9388B
ASCA Registered Consulting Arborist #744
ISA Tree Risk Assessment Qualified

PHOTOGRAPHS

Evenly spaced Eucalyptus stumps adjacent to roadwork.

One of the larger stems observed removed. Approximately 22-inches.

Eucalyptus trees were planted in rows 10-feet on center.

Previous stumps have been dug up and masticated.

A small number of existing oaks are growing in a small island next to the road in parcels 007 and 003.

Large Landmark Eucalyptus can be left on site or removed if warranted by new development.

There are several smaller (< 36") Monterey pine trees in the eastern section of the lots.

Storesund Consulting
154 Lawson Road, Kensington CA 94707
510-225-5389 (cell) email: rune@storesundconsulting.com

EXHIBIT B

Ono Consulting
International Society of Arboriculture
Certified Arborist Municipal Specialist
Board Certified Master Arborist #WE-9388BM
ASCA Registered Consulting Arborist #744
PO Box 508, Pacific Grove, CA 93950
Telephone (831) 402-2959

April 12, 2023

Ella Industries
608-B Missouri Street
San Francisco, CA 94107
Attention: Mr. Timothy Moore

RE: Oak Restoration and Forest Management Plan – 146 Vega Road

Mr. Moore

We were informed that Monterey County has issued an Administrative Citation in response to some allegedly unpermitted grading that had occurred in and around the previously existing access road on the property. To resolve the Administrative Citation, the County has prepared a Stipulated Agreement that requires the impacted area to be restored to its pre-existing condition. The restoration would include restoring the previously existing eucalyptus plantation conditions.

As the County is aware, we prepared a Forest Restoration and Management Plan dated March 8, 2022, to address the prior tree removal that occurred at the property. Our report was intended to guide the restoration of the whole property, address "the removal of eucalyptus trees, and provide recommendations to help transition the former eucalyptus plantation back to natural oak woodland". The previously existing eucalyptus plantation is not only a fire risk, but this species is also not conducive to native coast live oak regeneration or germination. The large overstory eucalyptus trees constantly shed leaves and bark, creating a very hostile environment for native tree seedlings. The end goal for the site needs to be the reduction if not eradication of the non-native eucalypts and replacement with native tree and shrub cover. Accordingly, we do not recommend restoring the property to the forested condition that existed prior to the allegedly unpermitted grading.

Thank you very much and please feel free to call if there are any questions or if I can be of further assistance.

Sincerely,

Justin Ono
ASCA Registered Consulting Arborist #744
ISA Board Certified Master Arborist #WE-9388BM
ISA Certified Arborist Municipal Specialist
ISA Tree Risk Assessment Qualified

Storesund Consulting
154 Lawson Road, Kensington CA 94707
510-225-5389 (cell) email: rune@storesundconsulting.com

EXHIBIT C

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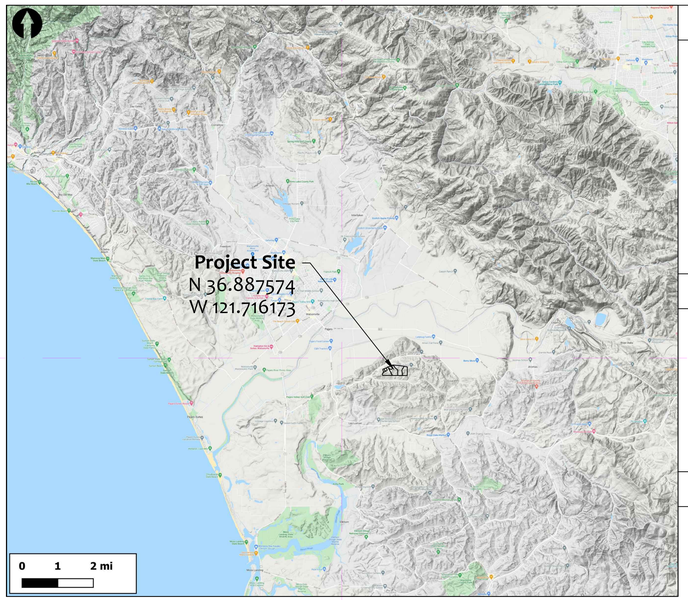
VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

VEGA ROAD PROPERTIES GRADING PROJECT

GRADING PLANS
MAY 10, 2022



VICINITY MAP

SHEET INDEX

G-1	TITLE SHEET	C-11	ROADWAY PLAN & PROFILE
G-2	SYMBOLS & ABBREVIATIONS	C-12	ROADWAY PLAN & PROFILE
C-1	EXISTING CONDITIONS	C-13	ROADWAY PLAN & PROFILE
C-2	EXISTING SLOPES	C-14	ROADWAY PLAN & PROFILE
C-3	PROPOSED SLOPES	C-15	SECTIONS
C-4	PLANNED UTILITIES	C-16	SECTIONS
C-5	ROADWAY PLAN & PROFILE	C-17	DRAINAGE
C-6	ROADWAY PLAN & PROFILE	C-18	DRAINAGE DETAILS
C-7	ROADWAY PLAN & PROFILE	C-19	EROSION CONTROL
C-8	ROADWAY PLAN & PROFILE	C-20	GENERAL DETAILS
C-9	ROADWAY PLAN & PROFILE	C-21	NOTES
C-10	ROADWAY PLAN & PROFILE	C-22	ENVISIONED DEVELOPMENT

OWNER

ELLA INDUSTRIES, INC
608B MISSOURI ST.
SAN FRANCISCO, CA 94107
(925) 389-6074

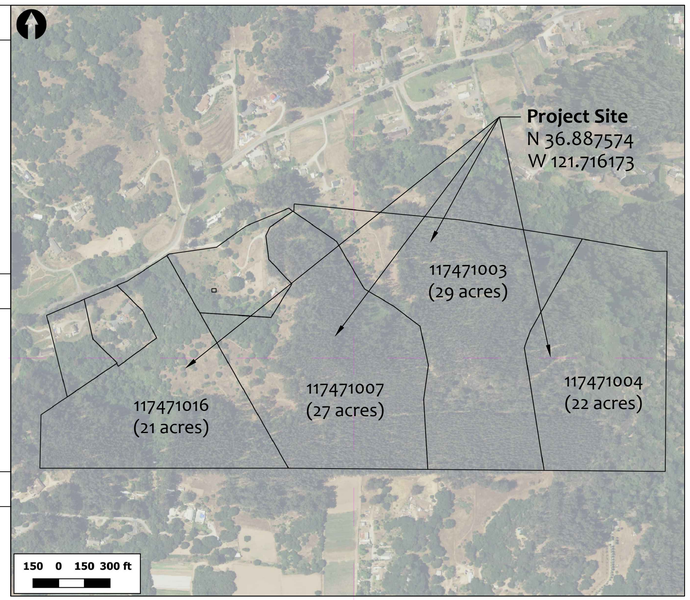
APNS: 117471003; 117471004; 117471007; & 117471016

PROJECT OVERVIEW

Project Overview: The purpose of this is to construct an access road and utilities for future service to un-developed residential parcels. The access road will be a private driveway to service the future construction of up to four (4) single family residences. The improvements will include installed utilities of electrical, potable water service, communication services, and storm water drainage. New grading and associated paving for the access road will include required fire service access and turn-outs/arounds. Construction anticipated summer and fall of 2022 (West) and 2023 (East).

Earthwork Quantities: Cut: 3,000 CY Fill: 2,300 CY Disturbed Area: 6 AC

Note: Approximate earth quantities provided for permit valuation. Contractor shall be responsible for determining all material takeoffs.



SITE MAP

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
Russ Storesund
NO. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
Russ Storesund
NO. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DATE:
DESIGNED BY:
DWN BY: CKD BY:
SOLICITATION NO.:
CONTRACT NO.:
SUBMITTED BY:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
96 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

TITLE SHEET
VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
G-1
SHEET 1 OF 24

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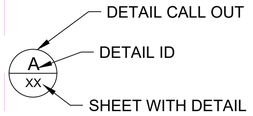
STANDARD ABBREVIATIONS:

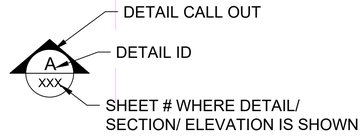
AB - ANCHOR BOLT
AC - ASPHALT CONCRETE or ALTERNATING CURRENT
ADH AB - ADHESIVE ANCHOR BOLT
AGG or AGGR - AGGREGATE
APPROX - APPROXIMATELY
AV - AIR VALVE
@ - AT
BFV - BUTTERFLY VALVE
BF - BLIND FLANGE
BKFL - BACKFILL
BLDG - BUILDING
BOTT - BOTTOM
BV - BALL VALVE
C or COND - CONDUIT
CIP - CAST IN PLACE
C or C/L - CENTERLINE
CL or CLR - CLEAR
CL2 - CHLORINE SOLUTION
CMP - CORRUGATED METAL PIPE
COMB - COMBINATION
CONC - CONCRETE
CONST - CONSTRUCTION
CONT - CONTINUOUS
CONTR - CONTRACTOR
CTR - CENTER
CORP - CORPORATION
CP - CONTROL POINT
CU - COPPER
D - DRAIN
DI - DUCTILE IRON
DIP - DUCTILE IRON PIPE
DIA - DIAMETER
DIM - DIMENSION
DIST - DISTANCE
DN - DOWN
DWG - DRAWING
EA - EACH
EG - EXISTING GROUND
ELEC - ELECTRIC
EL or ELEV - ELEVATION
ELB - ELBOW
EMBED - EMBED or EMBEDMENT
ENGR - ENGINEER
EP - EDGE OF PAVEMENT
EQ - EQUAL
EQUIP - EQUIPMENT
ESMT - EASEMENT
EW - EACH WAY
EXP AB - EXPANSIVE ANCHOR BOLT
EXT - EXTERIOR
(E) or EXIST - EXISTING
FBE - FUSION BONDED EPOXY
FCA - FLANGED COUPLING ADAPTER
FC - FLEXIBLE COUPLING
FF - FINISHED FLOOR or FAR FACE
FG or FIN GR - FINISH GRADE
FH - FIRE HYDRANT or FULL HEIGHT
FIN - FINISH
FL - FLOW LINE
FLG - FLANGE
FLR - FLOOR
FND - FOUNDATION
FTG - FOOTING
GAL - GALLON
GALV - GALVANIZED
GC - GROOVED COUPLING
GSP - GALVANIZED STEEL PIPE
GV - GATE VALVE
HC - HALF COUPLING
HORIZ - HORIZONTAL
HD - HOLDOWN or HOT DIPPED
HDR - HEADER
HS - HIGH STRENGTH

HT - HEIGHT
ID - INSIDE DIAMETER
INT - INTERIOR or INTERMEDIATE
INV - INVERT
JT - JOINT
LF - LINEAL FOOT
MAX - MAXIMUM
MECH - MECHANICAL
MFR - MANUFACTURER
MIN - MINIMUM
MISC - MISCELLANEOUS
MJ - MECHANICAL JOINT
MRS - MECHANICAL RUBBER SEAL
MTL - METAL
MWS - MAXIMUM WATER SURFACE
(N) - NEW
NC - NORMALLY CLOSED
NO - NORMALLY OPEN
NIC - NOT IN CONTRACT
NPT - NATIONAL PIPE THREAD
NTS - NOT TO SCALE
Ø - DIAMETER
O/ - OVER
O/F - OVERFLOW
OC - ON CENTER
OD - OUTSIDE DIAMETER
OF - OUTSIDE FACE
OG - ORIGINAL GROUND
OPG or OPNG - OPENING
PE - PLAIN END
℄ or PL - PLATE OR PROPERTY LINE
- POUND
PP - POWER POLE
PRV - PRESSURE RELIEF VALVE
PSI - POUNDS PER SQUARE INCH
PW - POTABLE WATER
PVC - POLYVINYL CHLORIDE PIPE
R - RADIUS
RED - REDUCER
REINF - REINFORCEMENT STEEL, REBAR
REQ'D - REQUIRED
REST - RESTRAINED
RFCA - RESTRAINED FLANGED COUPLING ADAPTER
S - SLOPE
SCH or SCHED - SCHEDULE
SD - STORM DRAIN
SECT - SECTION
SGL - SINGLE
SH or SHT - SHEET
SHTG - SHEATHING, SHEETING
SIM - SIMILAR
SPEC'S - SPECIFICATIONS
SQ - SQUARE
SS - SANITARY SEWER
SSTL - STAINLESS STEEL
STD - STANDARD
STL - STEEL
STRUCT - STRUCTURAL
SYM - SYMMETRICAL
THK - THICK or THICKNESS
THD or THRD - THREADED
TOW - TOP OF WALL
TR - THRUST RESTRAINT
TYP - TYPICAL
UG - UNDERGROUND
UNO - UNLESS NOTED OTHERWISE
VERT - VERTICAL
VB - VALVE BOX
W - WATER
WM - WATER METER
WS - WATER STOP

GENERAL INFORMATION

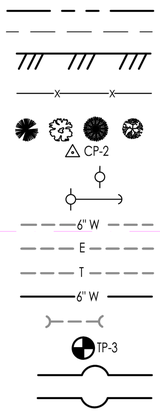


DETAIL CALLOUT



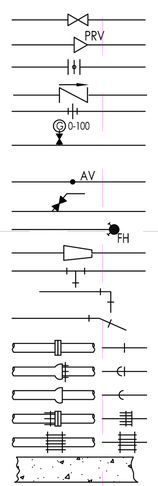
SECTION MARKER

CIVIL LEGEND



PROPERTY LINE
WATER OR CONSTRUCTION EASEMENT LINE
LIMITS OF AGGREGATE BASE OR PAVEMENT
FENCE
TREE, (PINE, CEDAR, FIR & OAK)
SURVEY CONTROL POINT NUMBER
UTILITY POLE
UTILITY POLE WITH ANCHOR & GUY
EXISTING WATER MAIN, DIAMETER
UNDERGROUND ELECTRICAL
UNDERGROUND TELEPHONE
NEW WATER MAIN, DIAMETER
EXISTING CULVERT
BORING/TEST PIT, WITH NUMBER
PIPE CROSSES OVER ANOTHER
PIPE CROSSES UNDER ANOTHER

PIPING LEGEND



GATE VALVE
PRESSURE REDUCING VALVE
BUTTERFLY VALVE
CHECK VALVE
PIPE UNION
PRESSURE GAGE AND BRASS COCK, RANGE INDICATED
AIR VALVE ASSEMBLY
BLOW OFF
FIRE HYDRANT
REDUCER
TEE
BEND (ELBOW)
BEND (ELBOW) DEFLECTION SHOWN ON PLANS
FLANGE JOINT
MECHANICAL JOINT
BELL & SPIGOT JOINT
FLANGED COUPLING ADAPTOR
FLEXIBLE COUPLING
CONCRETE SECTION

NOTE:

WHERE EXISTING & NEW FACILITIES ARE SHOWN TOGETHER, THE NEW FACILITIES WILL GENERALLY BE SHOWN IN BOLD

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/19/2022	RS

REGISTERED PROFESSIONAL ENGINEER — ERIC STORESUND — No. C 84475 — EXP 06/30/2023 — CIVIL — STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER — ERIC STORESUND — No. GE2855 — EXP 06/30/2023 — GEOTECHNICAL — STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
545 ANDERSON ROAD
KENSINGTON, CA 94707
(510) 326-5849

SYMBOLS & ABBREVIATIONS
VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
G-2
SHEET 2 OF 24

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1 2 3 4 5

D

C

B

A

(E) UN-IMPROVED
ACCESS ROAD

0 200 400 Feet

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
ROBERT STORESUND
No. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
ROBERT STORESUND
No. GE 2825
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY: CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
146 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5949

EXISTING CONDITIONS

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-1
SHEET 3 OF 24

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1 2 3 4 5

D C B A

(E) UN-IMPROVED
ACCESS ROAD

Slopes Table			
Number	Minimum Slope	Maximum Slope	Color
1	0.00%	15.00%	
2	15.00%	25.00%	
3	25.00%	50.00%	

0 200 400 Feet

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
Rune Storesund
NO. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
Rune Storesund
NO. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES
0 1 2 3

Storesund Consulting
STORESUND CONSULTING
15 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

EXISTING SLOPES

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-2
SHEET 4 OF 24

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1 2 3 4 5

D C B A

Slopes Table			
Number	Minimum Slope	Maximum Slope	Color
1	0.00%	15.00%	
2	15.00%	25.00%	
3	25.00%	50.00%	

0 200 400 Feet

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. C 64479
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. GE2355
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
15 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

PROPOSED SLOPES

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-3
SHEET 5 OF 24

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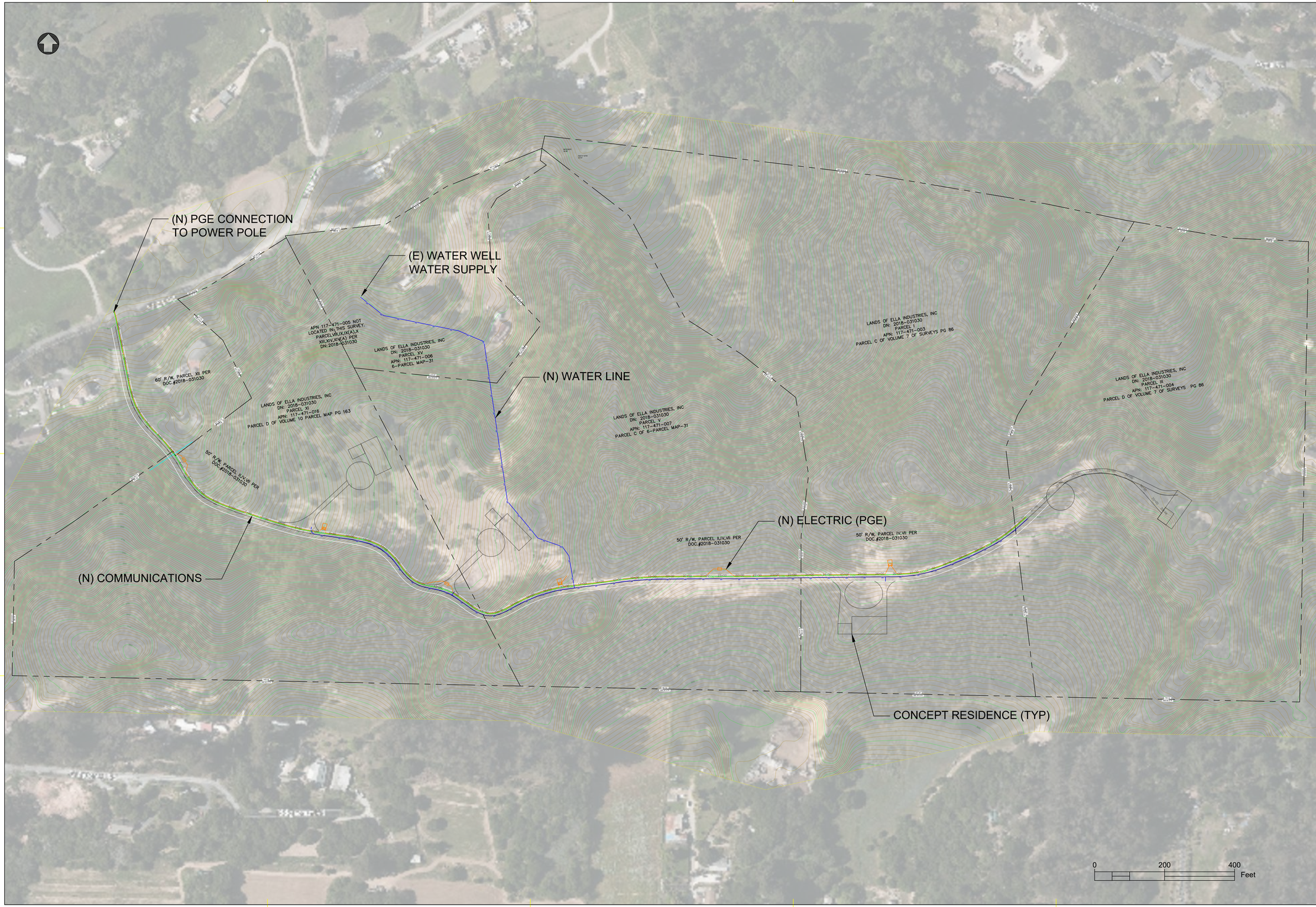

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
RUNE STORESUND
NO. C- 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
RUNE STORESUND
NO. GE 2355
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
154 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

PLANNED UTILITIES

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-4
SHEET 6 OF 24

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MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
RYAN STORESUND
NO. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
RYAN STORESUND
NO. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY: CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES
0 1 2 3

Storesund Consulting
STORESUND CONSULTING
785 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

ROADWAY PLAN & PROFILE - OVERVIEW

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-5
SHEET 7 OF 24

Profile V
Pro

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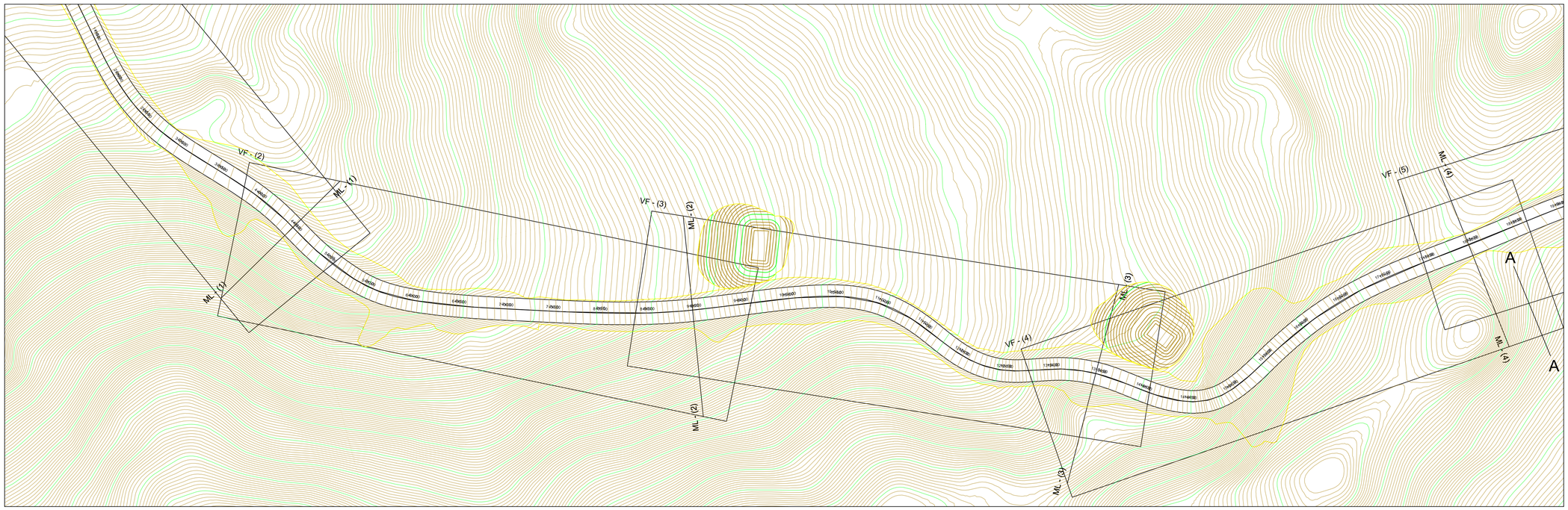
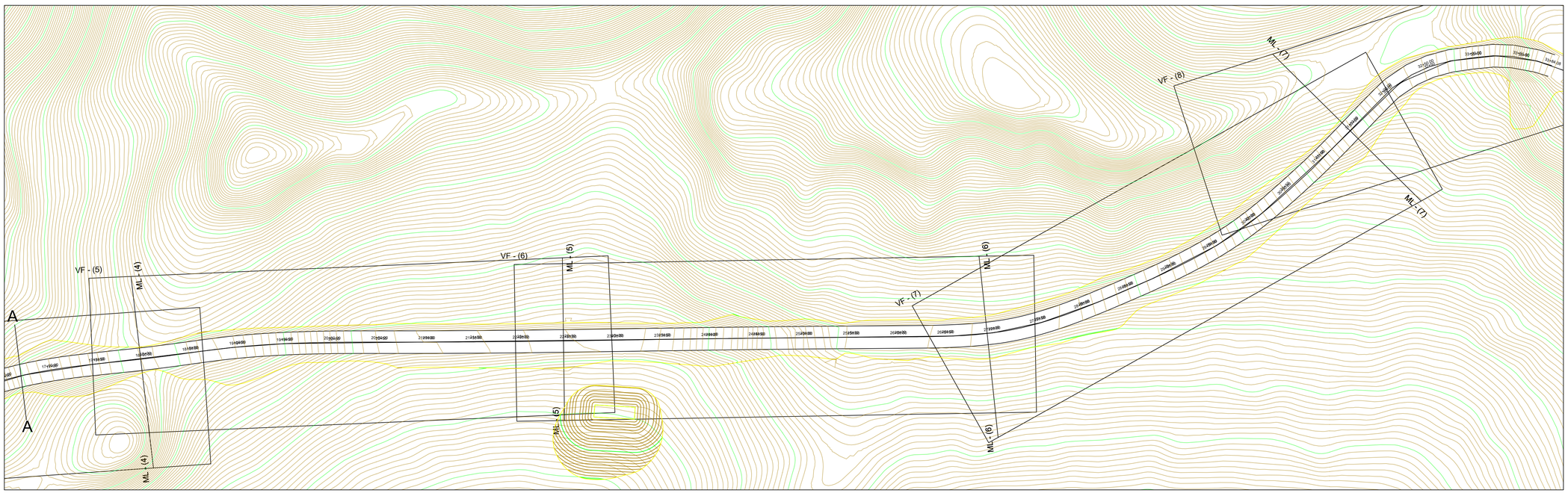


"WEST" ROADWAY SEGMENT STA 0+00 TO STA 18+00

SCALE: AS SHOWN

A
C-6



"EAST" ROADWAY SEGMENT STA 18+00 TO STA 34+00

SCALE: AS SHOWN

B
C-6

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
NO. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
NO. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY: CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO:
CONTRACT NO:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

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STORESUND CONSULTING
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KENSINGTON, CA 94707
(510) 526-5849

ROADWAY PLAN & PROFILE

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-6
SHEET 8 OF 24

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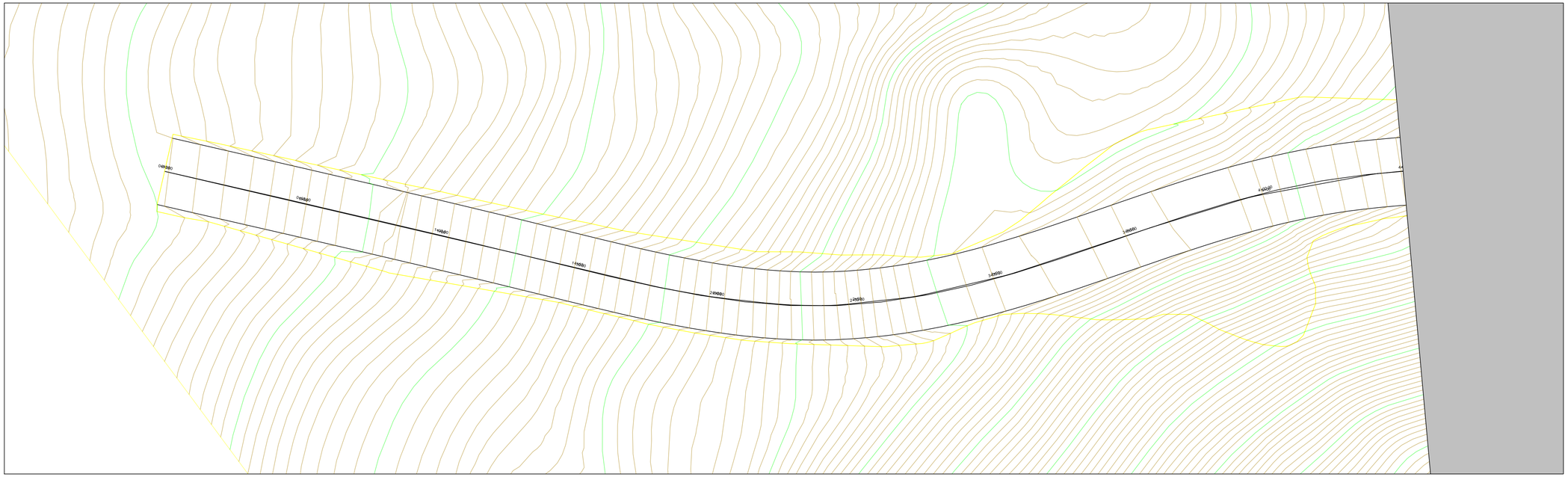

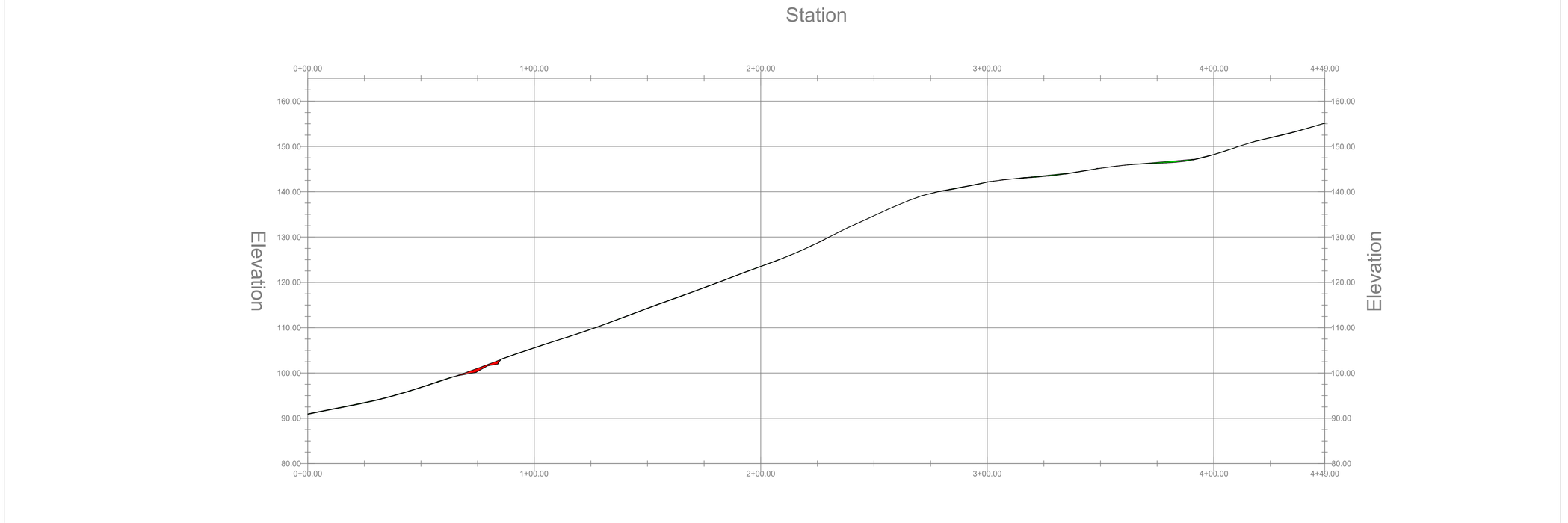

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY: CKD BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
SUBMITTED BY:
FOR REDUCED PLANS ORIGINAL SCALE INCHES
0 1 2 3

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KENSINGTON, CA 94707
(510) 526-5849

ROADWAY PLAN & PROFILE

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-7
SHEET 9 OF 24

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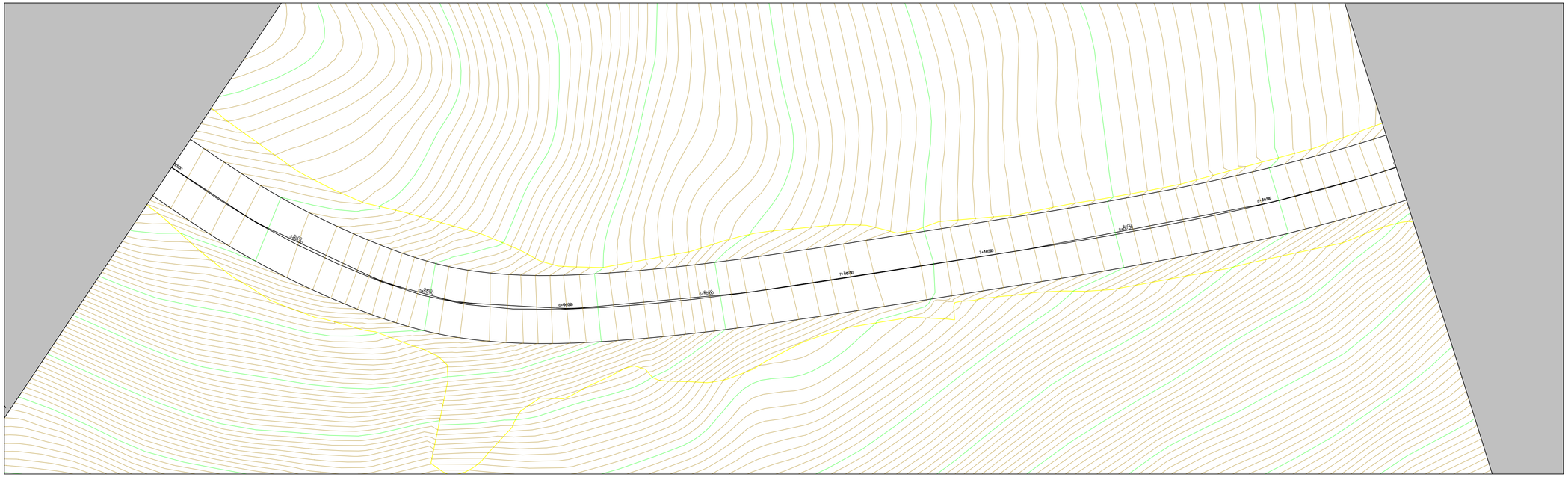

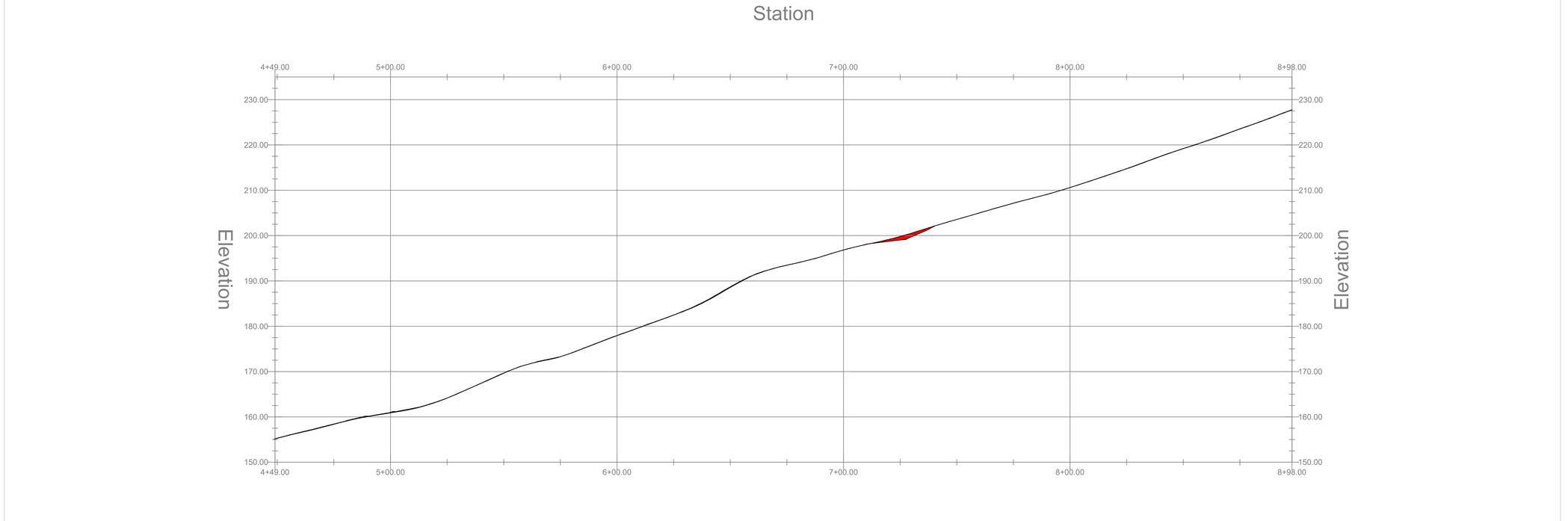

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES
0 1 2 3

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STORESUND CONSULTING
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KENSINGTON, CA 94707
(510) 526-5849

ROADWAY PLAN & PROFILE

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-8
SHEET 10 OF 24

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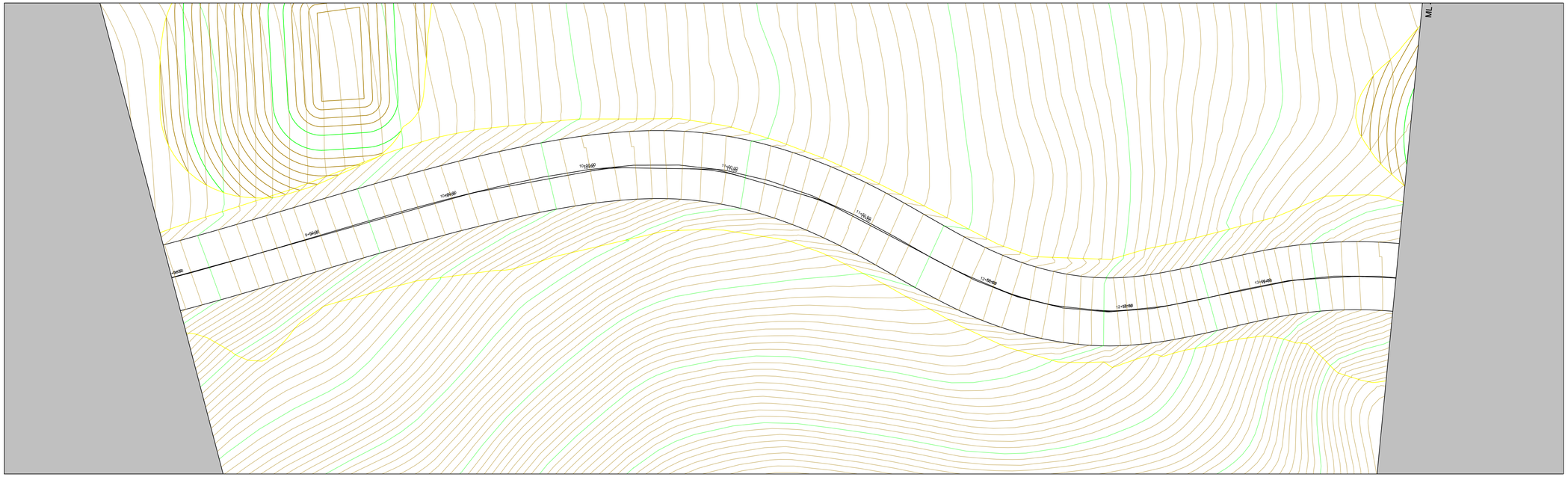

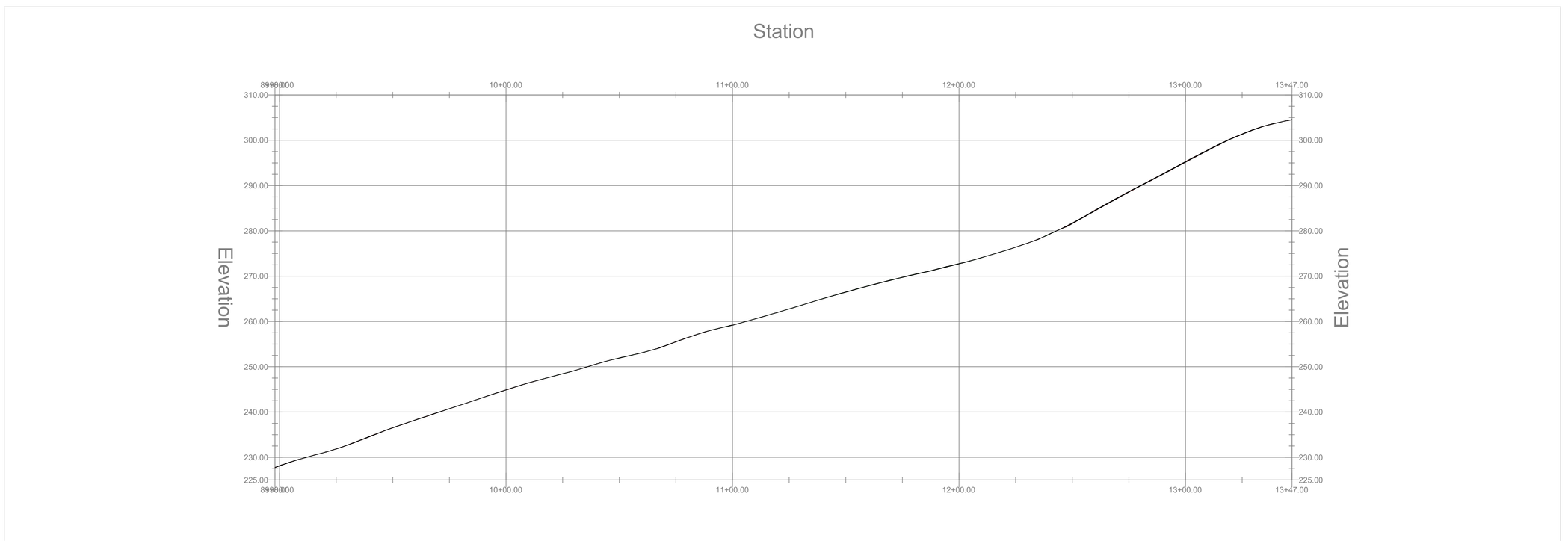

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES
0 1 2 3

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KENSINGTON, CA 94707
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ROADWAY PLAN & PROFILE

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-9
SHEET 11 OF 24

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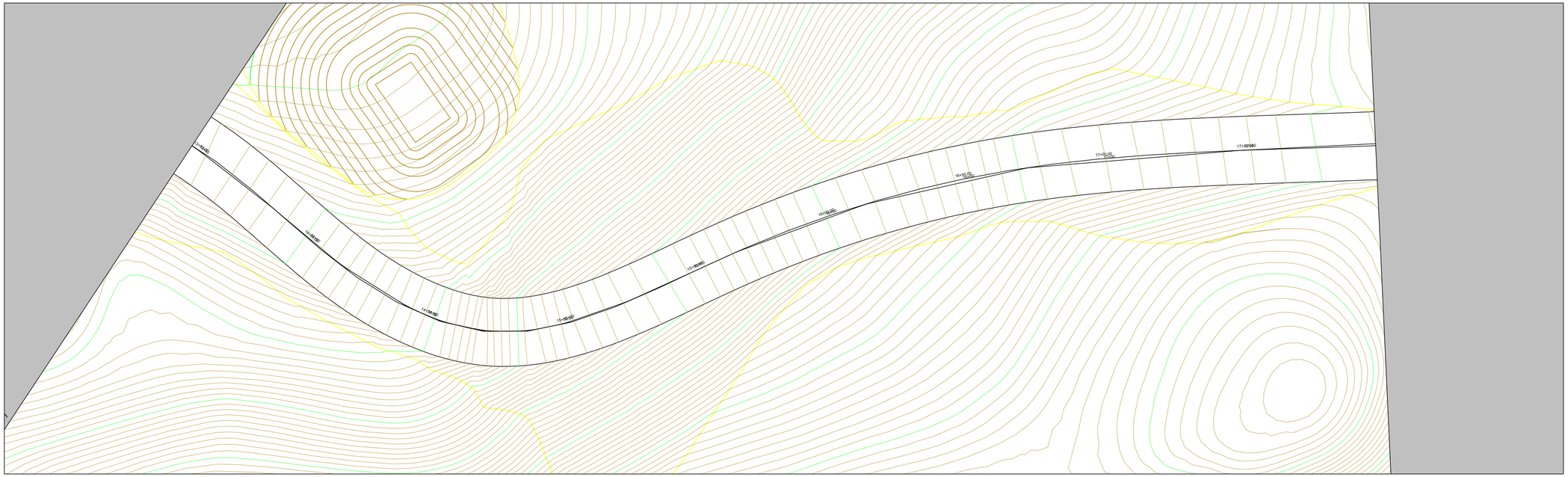
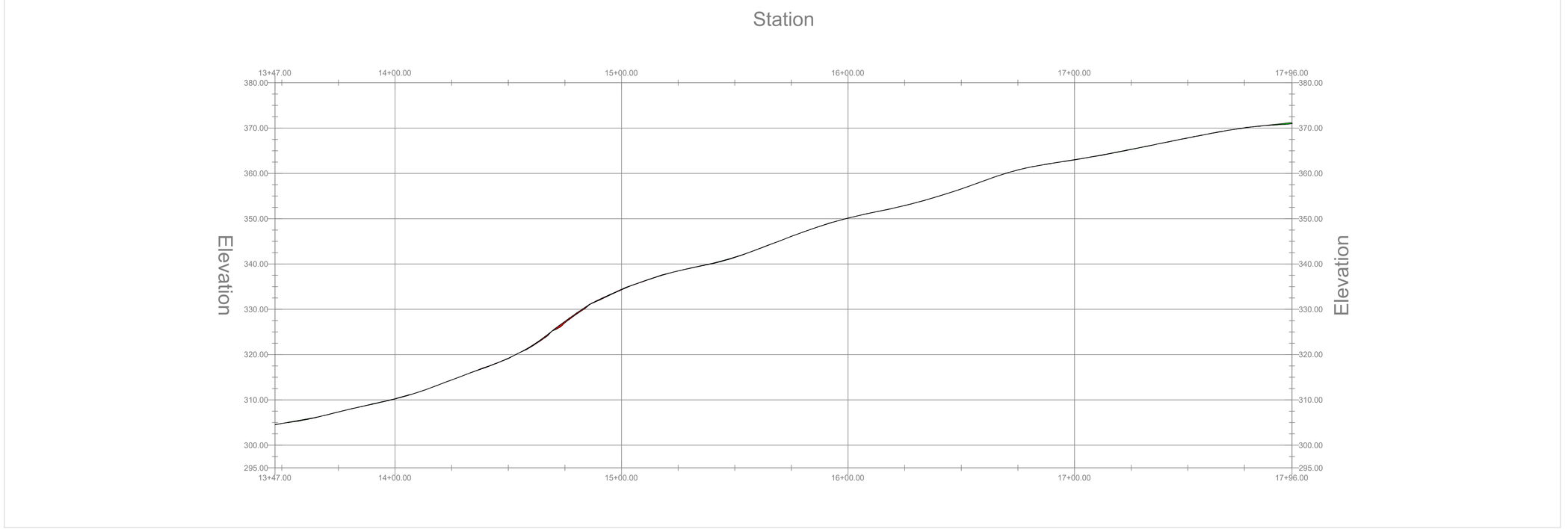




MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES
0 1 2 3

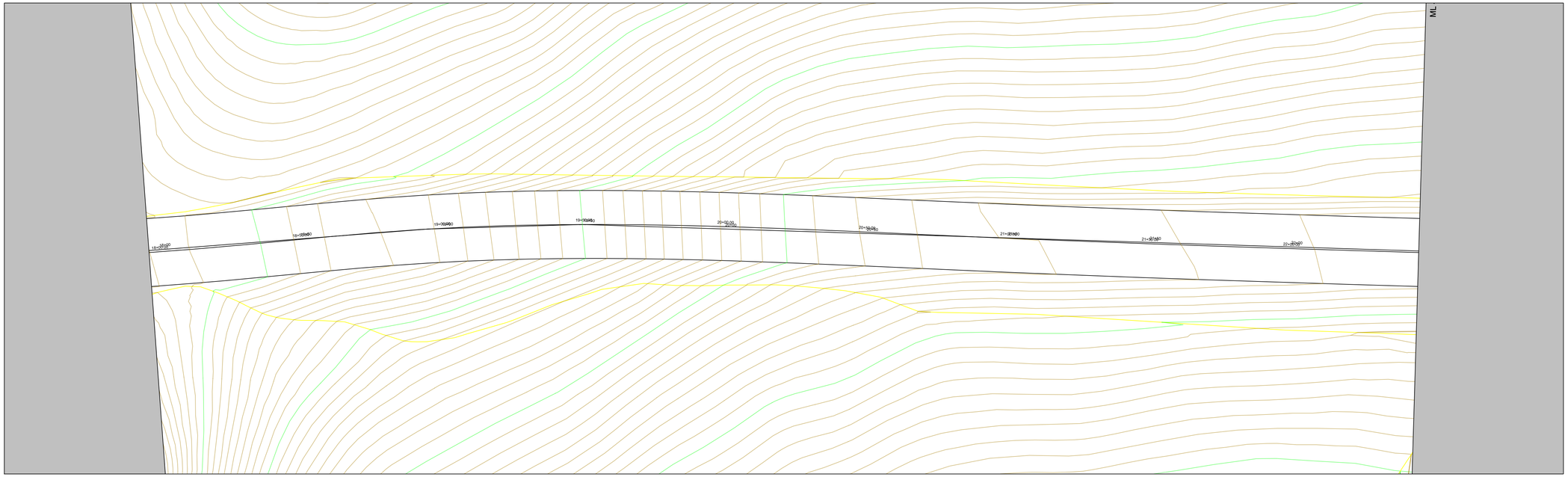
Storesund Consulting
STORESUND CONSULTING
1535 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

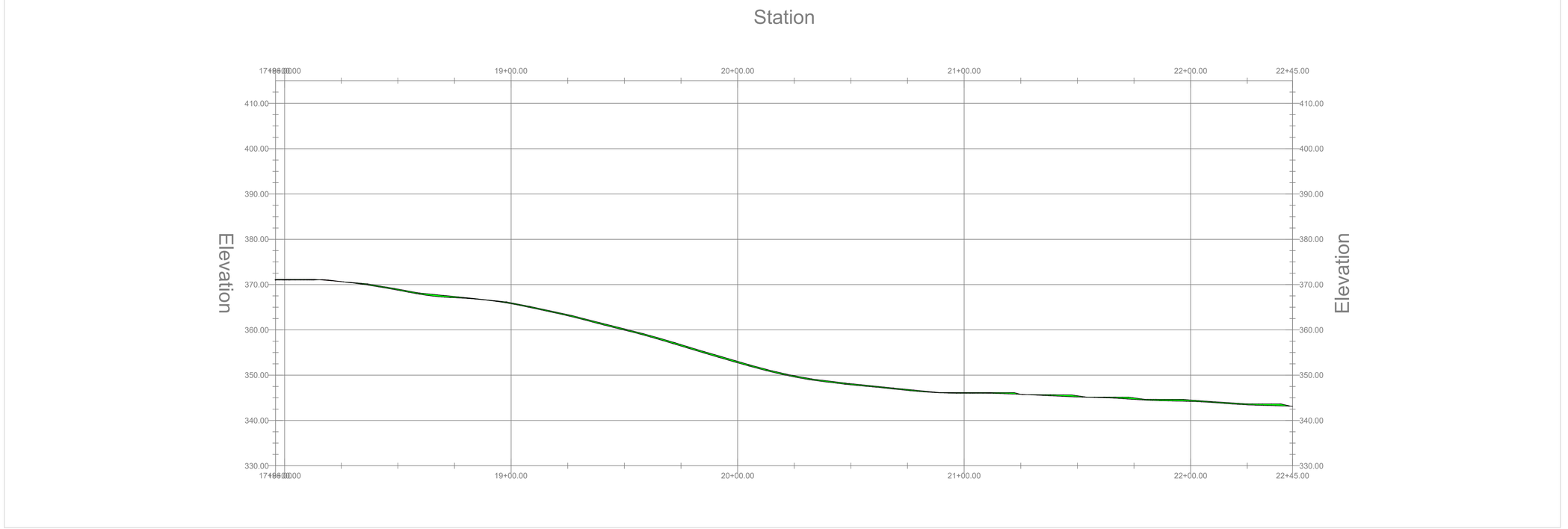
ROADWAY PLAN & PROFILE

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-10
SHEET 12 OF 24

DocuSign Envelope ID: 8E5FB016-176C-42C7-B2B1-0124FA025B4A





MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

Kurt Storsund
NO. C 64473
EXP 06/30/2023
REGISTERED PROFESSIONAL ENGINEER
CIVIL
STATE OF CALIFORNIA

Kurt Storsund
NO. GE2855
EXP 06/30/2023
REGISTERED PROFESSIONAL ENGINEER
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES
0 1 2 3

Storesund Consulting
STORESUND CONSULTING
1516 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

ROADWAY PLAN & PROFILE

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-11
SHEET 13 OF 24

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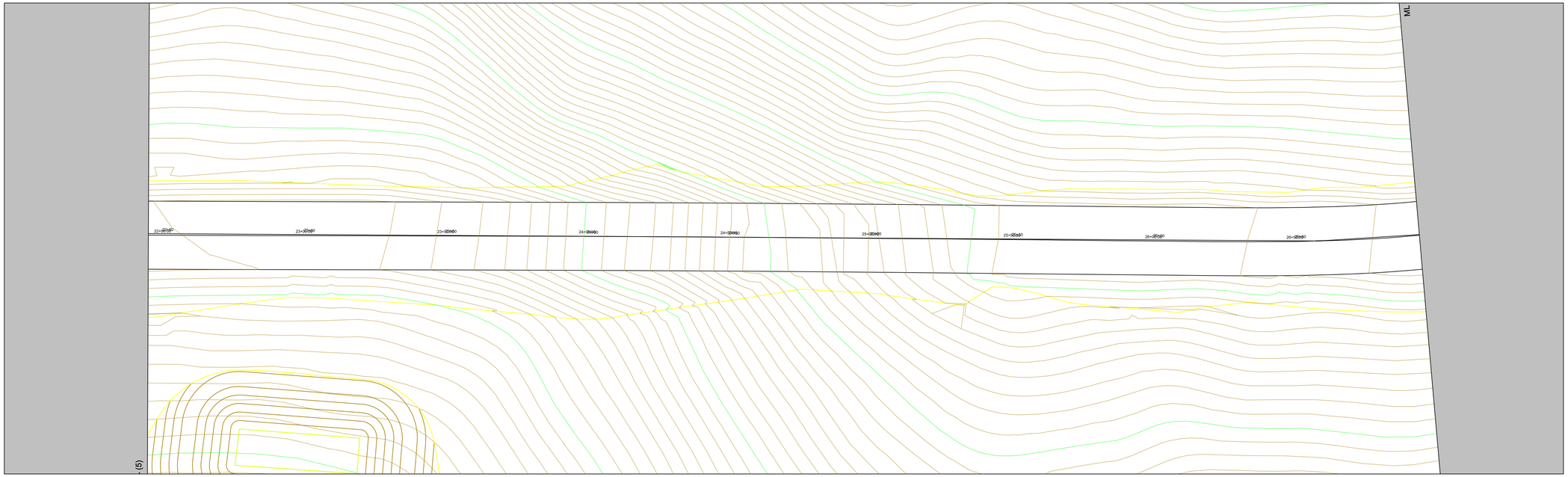
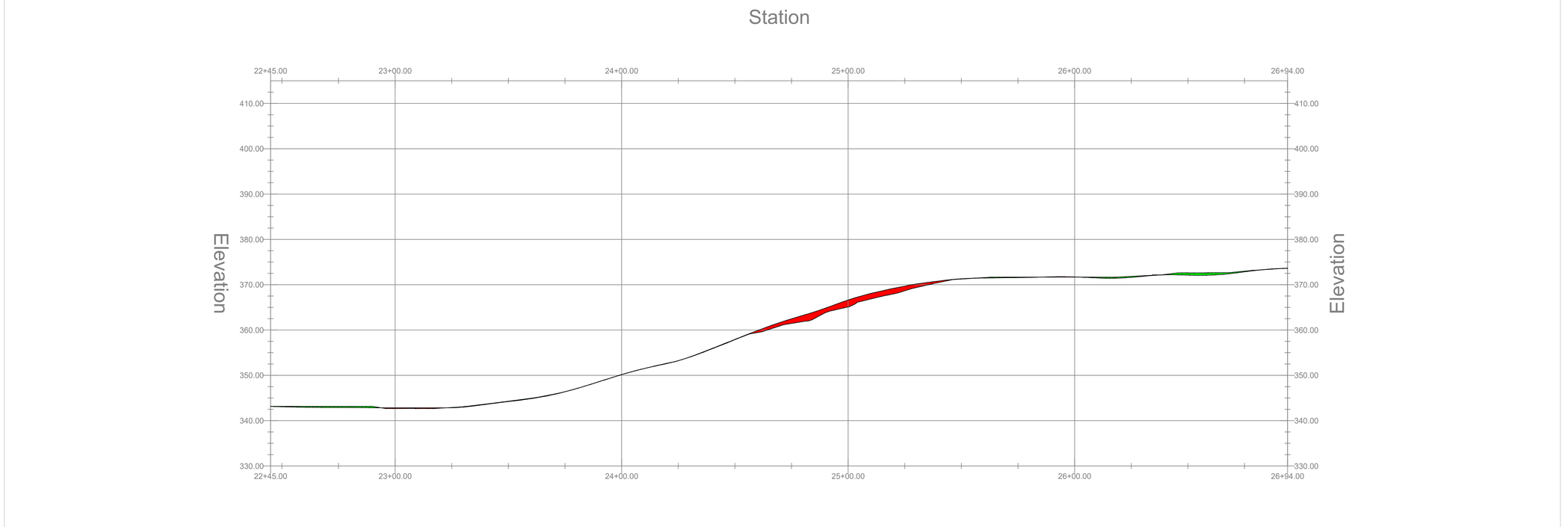




MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
RUSS STORESUND
No. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
RUSS STORESUND
No. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DATE:
SOLICITATION NO.:
CONTRACT NO.:
DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
FOR REDUCED PLANS ORIGINAL SCALE INCHES
0 1 2 3

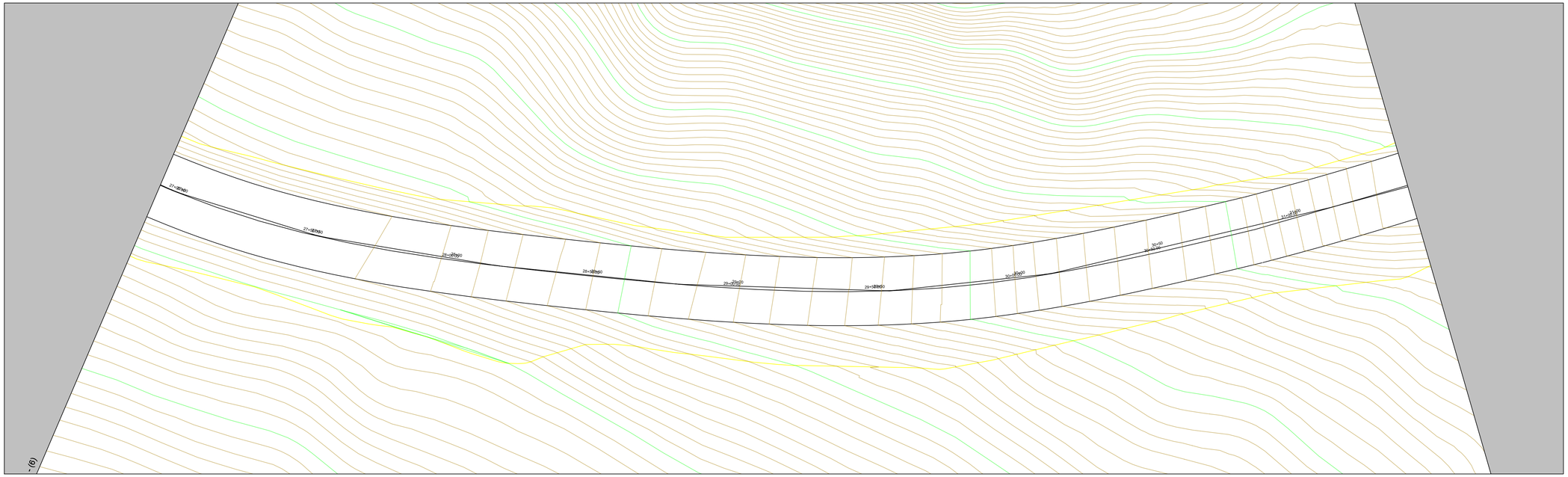
Storesund Consulting
STORESUND CONSULTING
1451 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

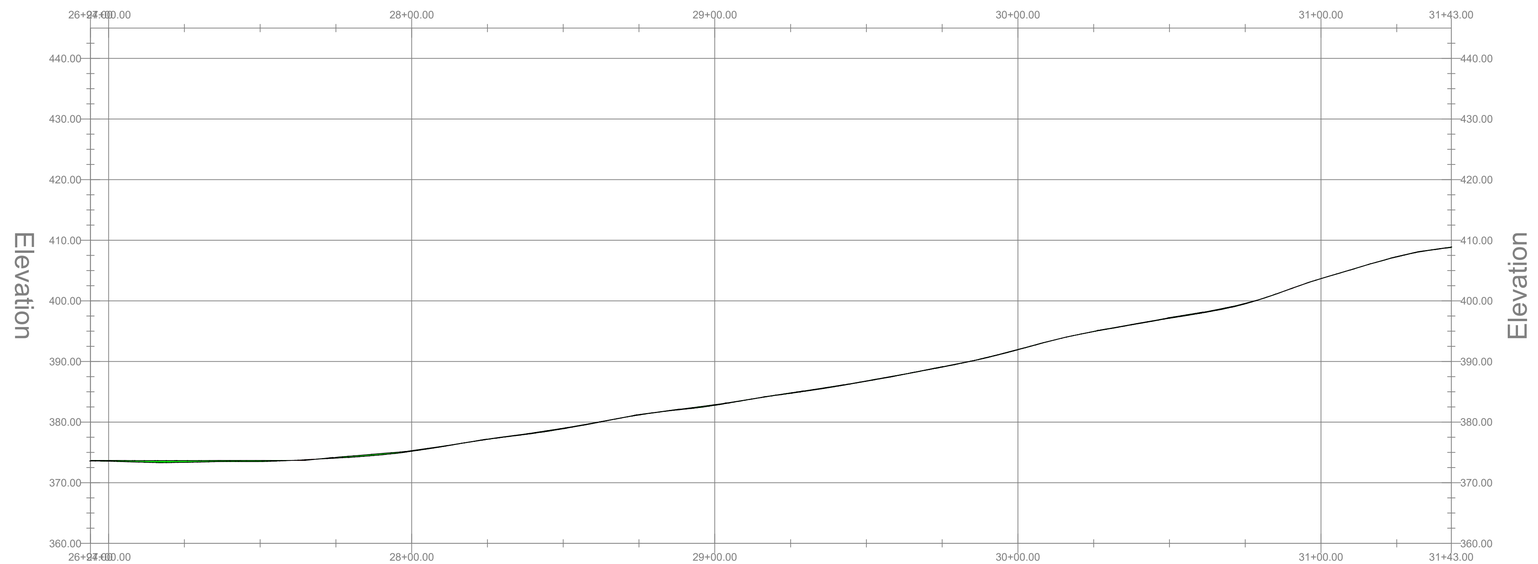
ROADWAY PLAN & PROFILE

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-12
SHEET 14 OF 24

DocuSign Envelope ID: 8E5FB016-176C-42C7-B2B1-0124FA025B4A





MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
Kuni Storesund
NO. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
Kuni Storesund
NO. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES
0 1 2 3

Storesund Consulting
STORESUND CONSULTING
1516 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

ROADWAY PLAN & PROFILE

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-13
SHEET 15 OF 24

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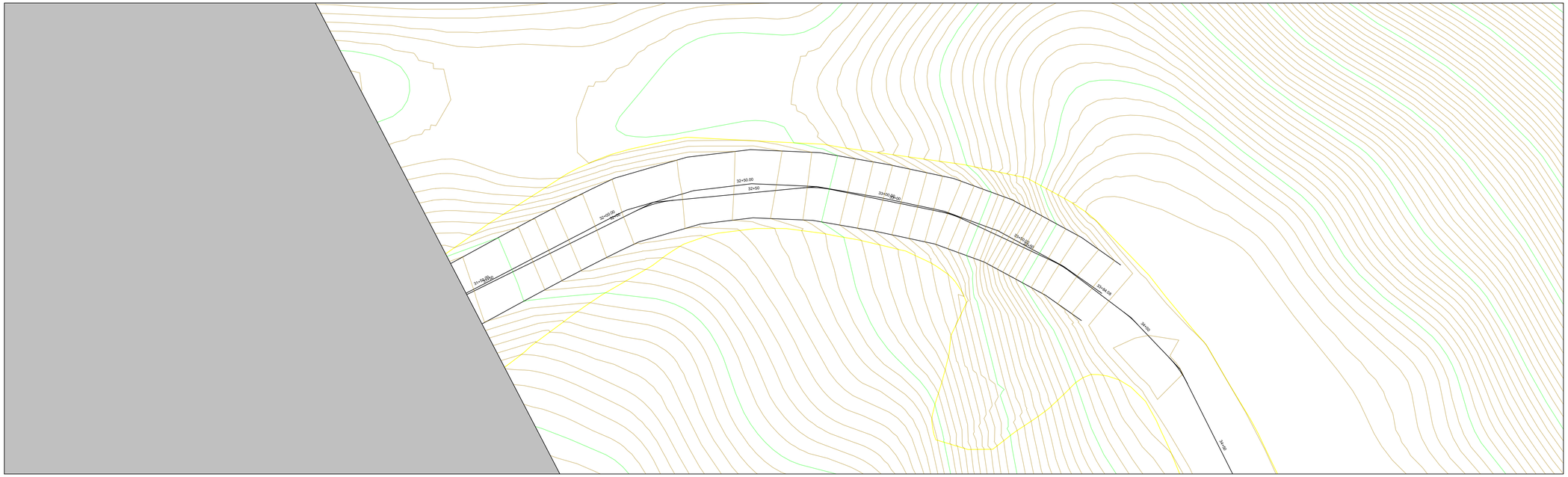
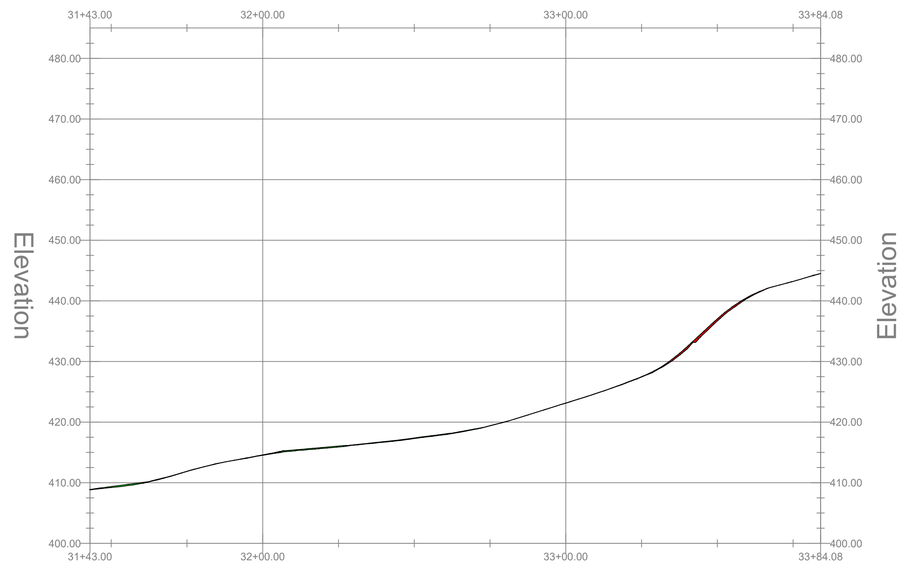




MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
RUNE STORESUND
No. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
RUNE STORESUND
No. GE 2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES
0 1 2 3

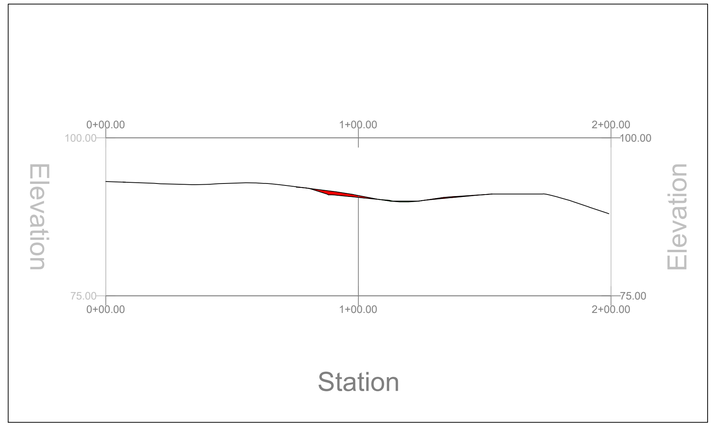
Storesund Consulting
STORESUND CONSULTING
1516 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

ROADWAY PLAN & PROFILE

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-14
SHEET 16 OF 24

DocuSign Envelope ID: 8E5FB016-176C-42C7-B2B1-0124FA025B4A



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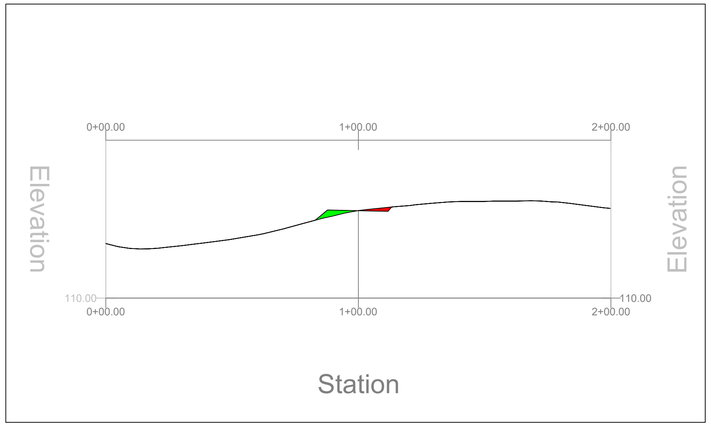
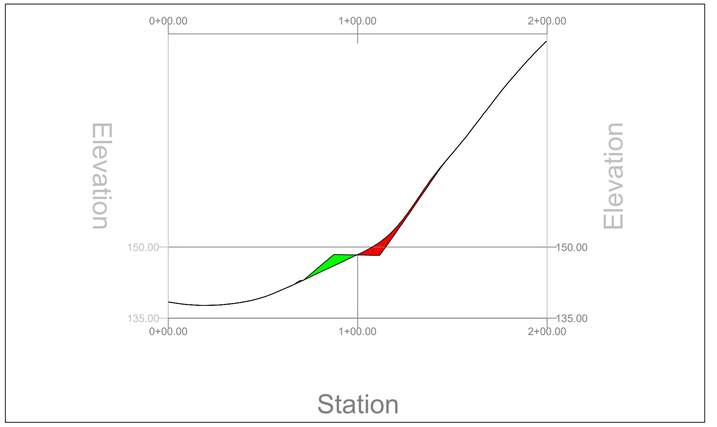
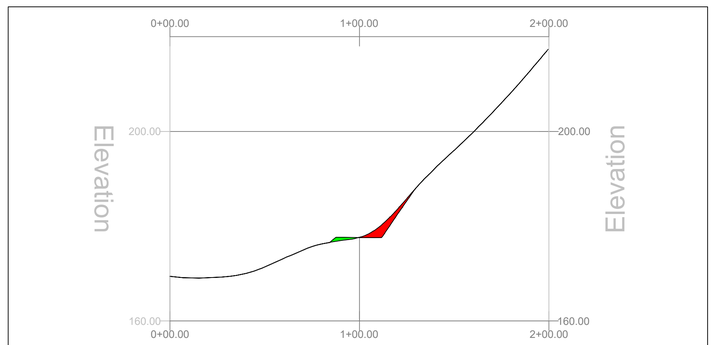
SCALE: AS SHOWN



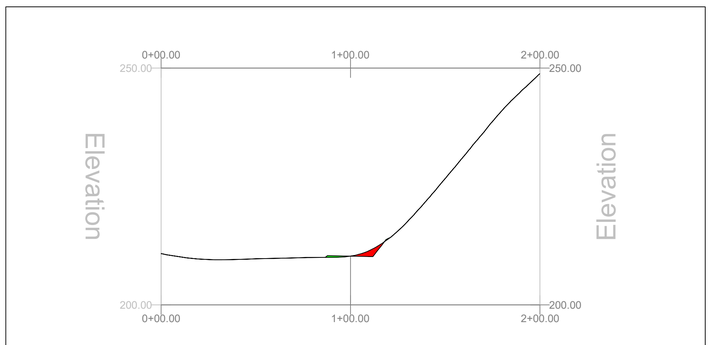
SECTION AT 2+00 — B / C-13
SCALE: AS SHOWN



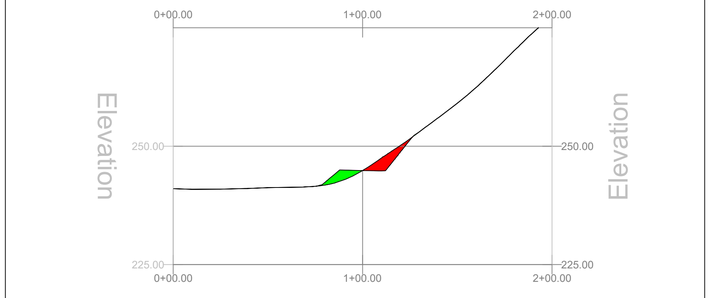
SECTION AT 4+00 — C / C-13
SCALE: AS SHOWN



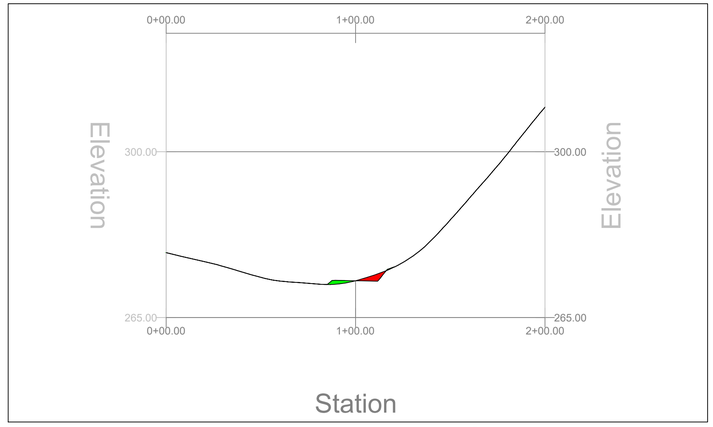
SECTION AT 6+00 — D / C-13
SCALE: AS SHOWN



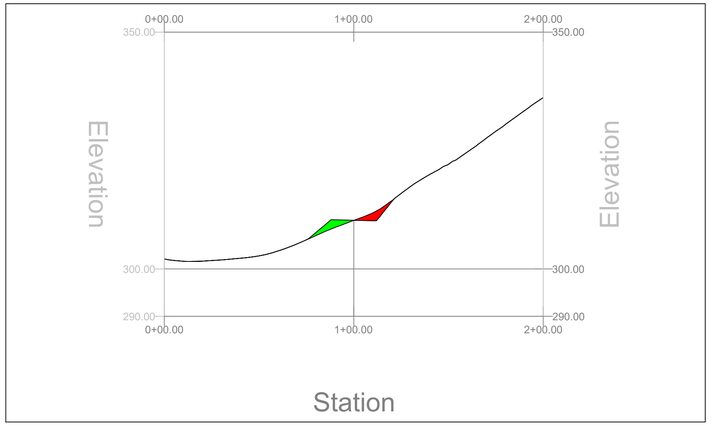
SECTION AT 8+00 — E / C-13
SCALE: AS SHOWN



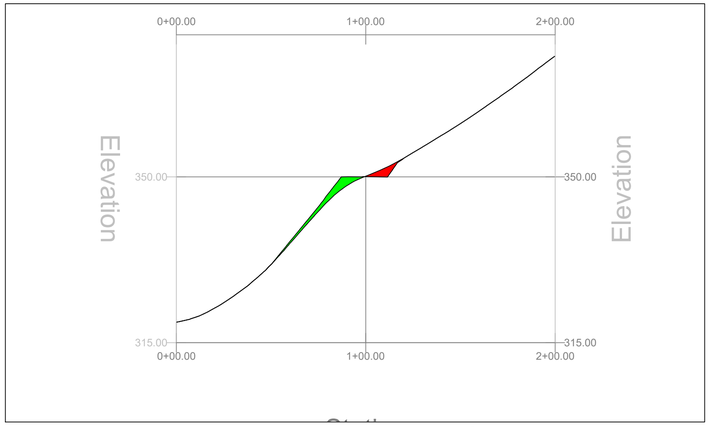
SECTION AT 10+00 — F / C-13
SCALE: AS SHOWN



SECTION AT 12+00 — G / C-15
SCALE: AS SHOWN



SECTION AT 14+00 — H / C-13
SCALE: AS SHOWN



SECTION AT 16+00 — I / C-13
SCALE: AS SHOWN

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER — KURT STORSUND — No. C 54473 — EXP 06/30/2023 — CIVIL — STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER — KURT STORSUND — No. GE 2825 — EXP 06/30/2023 — GEOTECHNICAL — STATE OF CALIFORNIA

DESIGNED BY: DATE:
DWN BY: CKD BY: SOLICITATION NO.:
SUBMITTED BY: CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
56 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

SECTIONS

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-15
SHEET 17 OF 24

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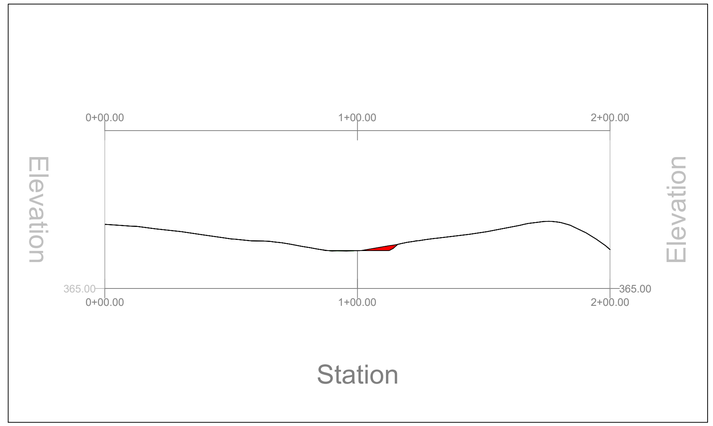
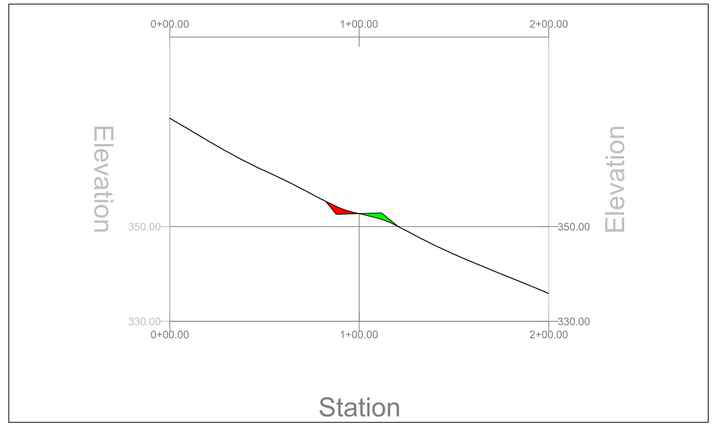
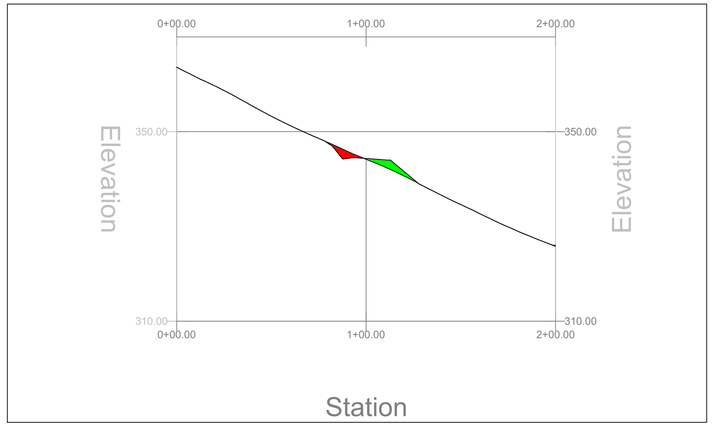


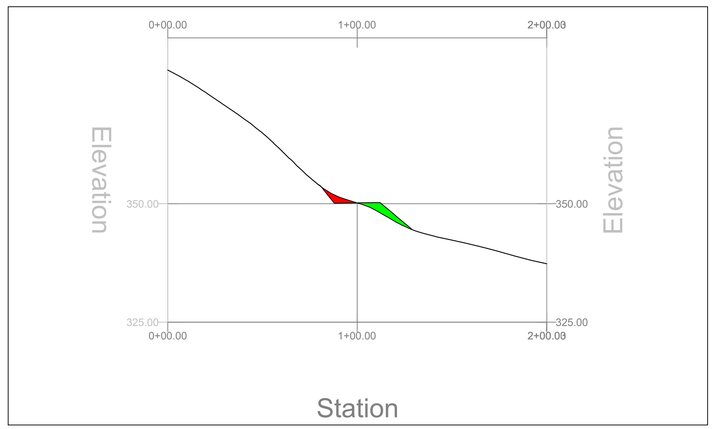
SECTION AT 18+00 — J / C-14
SCALE: AS SHOWN



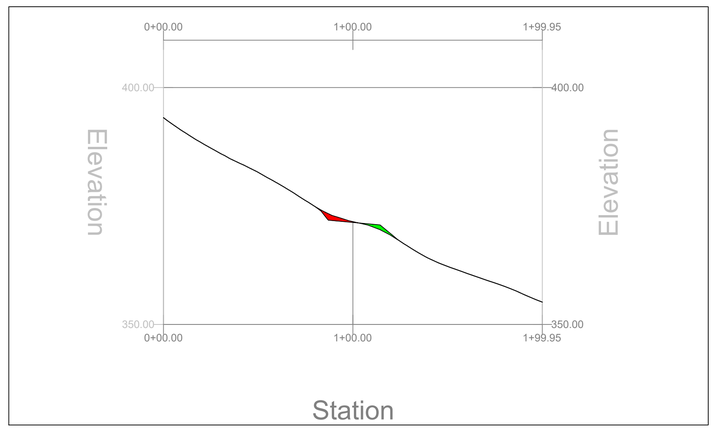
SECTION AT 20+00 — K / C-14
SCALE: AS SHOWN



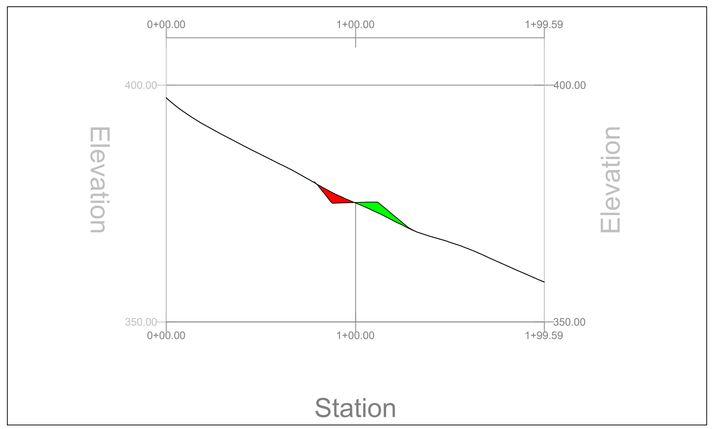
SECTION AT 22+00 — L / C-14
SCALE: AS SHOWN



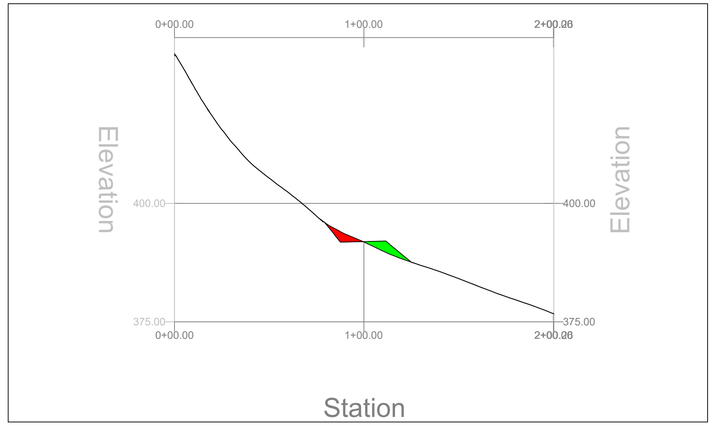
SECTION AT 24+00 — M / C-14
SCALE: AS SHOWN



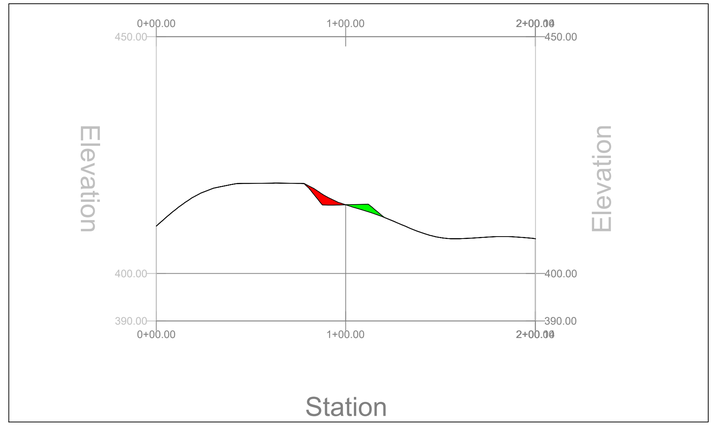
SECTION AT 26+00 — N / C-14
SCALE: AS SHOWN



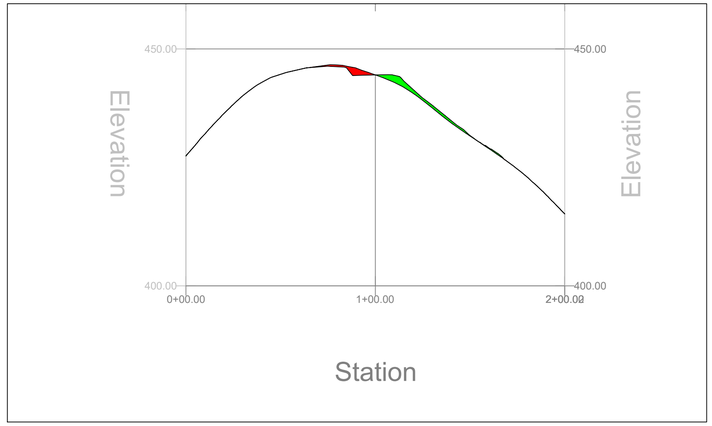
SECTION AT 28+00 — O / C-14
SCALE: AS SHOWN



SECTION AT 30+00 — P / C-14
SCALE: AS SHOWN



SECTION AT 32+00 — Q / C-14
SCALE: AS SHOWN



SECTION AT 33+80 — R / C-14
SCALE: AS SHOWN

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER — RUSS STORESUND — No. C 54473 — EXP 06/30/2023 — CIVIL — STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER — RUSS STORESUND — No. GE2825 — EXP 06/30/2023 — GEOTECHNICAL — STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
56 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

SECTIONS

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-16
SHEET 18 OF 24

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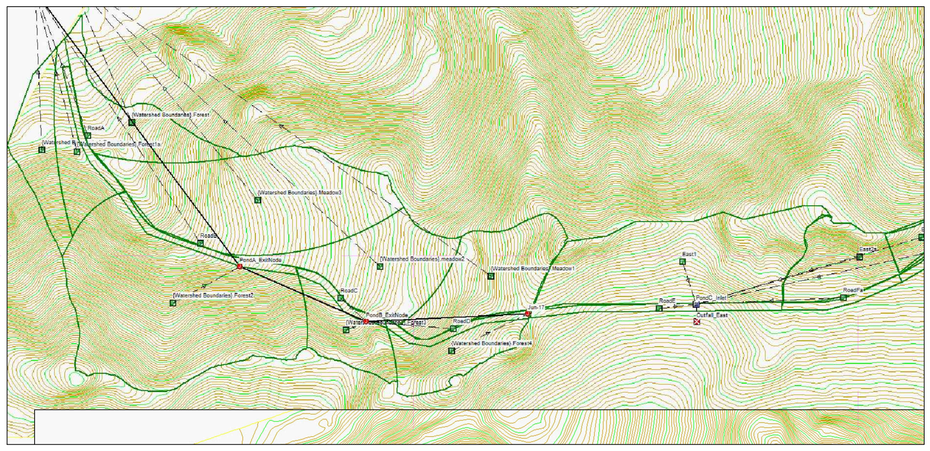
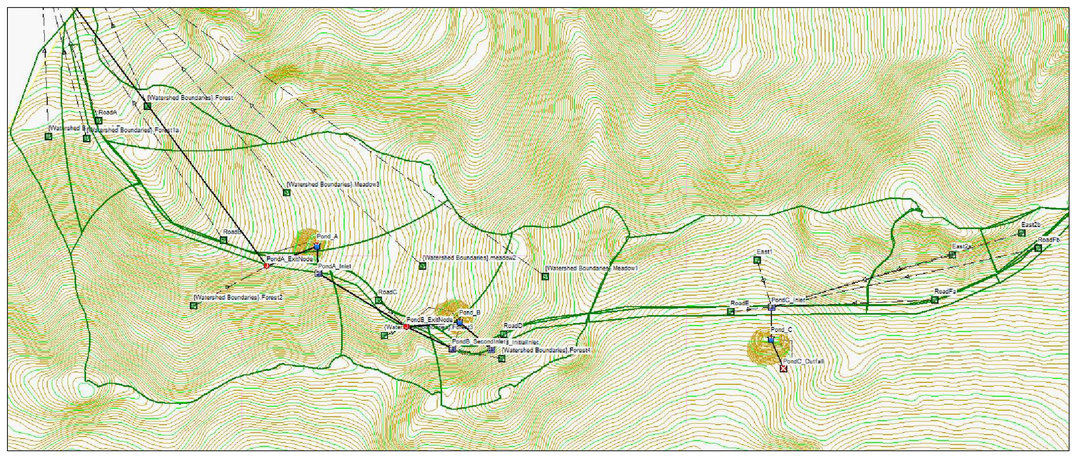
INFILTRATION TRENCH LAYOUT
SCALE: AS SHOWN
A
C-16



SSA MODEL – EXISTING CONDITIONS
SCALE: AS SHOWN
B
C-16



SSA MODEL – PROPOSED CONDITIONS
SCALE: AS SHOWN
C
C-16

NOTE(S): HYDRAULIC ANALYSES WERE PERFORMED USING AUTODESK STORM AND SANITARY ANALYSIS MODULE (2019). HYDROLOGIC ANALYSES WERE PERFORMED FOR THE OCTOBER 2021 RAIN EVENT AS WELL AS THE 10-YEAR; 25-YEAR; AND 50-YEAR PRECIPITATION EVENTS. NET CHANGE IN IMPERVIOUS AREA (ROADWAY CONSTRUCTION) IS APPROXIMATELY 55,000 SF.

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
Kurt Storsund
NO. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
Kurt Storsund
NO. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY: CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

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KENSINGTON, CA 94707
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DRAINAGE
VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-16
SHEET 18 OF 24

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24-HR PRECIPITATION EVENTS (WATSONVILLE WTR WKS)

2-YEAR: 2.70 IN (0.225 FT)

10-YEAR: 4.10 IN (0.342 FT)

25-YEAR: 4.98 IN (0.415 FT)

50-YEAR: 5.68 IN (0.473 FT)

100-YEAR: 6.40 IN (0.533 FT)

SOURCE: https://hdsc.nws.noaa.gov/hdsc/pfds/pfds_map_cont.html?bkmrk=ca

SOIL STORAGE CAPACITY

ASSUME 80% OF 2-YEAR EVENT

STORAGE: 0.80 x 0.225 FT x 56,000 SF = 10,080 CF

IMPERMEABLE SURFACE OFFSET CALCULATIONS

Pre-development impervious surface: 0 SF

Post-development impervious surface: 3,000 ft x 18 ft = 54,000 SF

Required onsite storage: [(55,000 SF) / (100 SF)] x 13.5 CF = 7,425 CF

Infiltration Volume Pond A: 3,000 CF

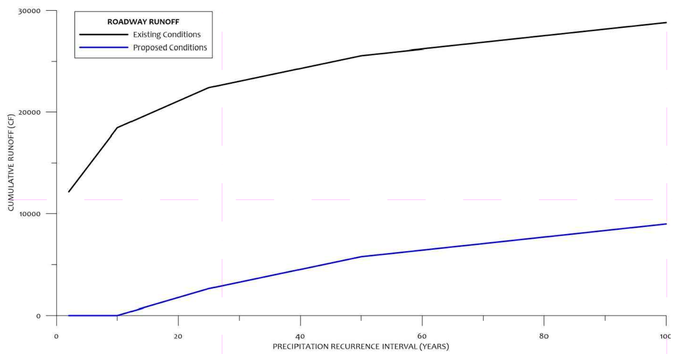
Infiltration Volume Pond B: 2,400 CF

Infiltration Volume Pond B: 2,400 CF

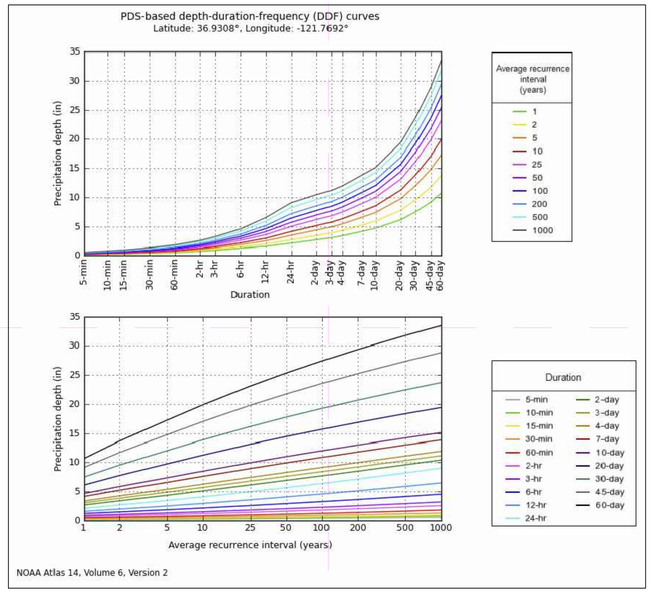
Total Infiltration Pond Volume: (3,000 CF + 2,400 CF + 4,300 CF) = 9,700 CF

COMPARISON OF EXISTING RUNOFF VS PROPOSED IMPERVIOUS SURFACE AND INFILTRATION PONDS

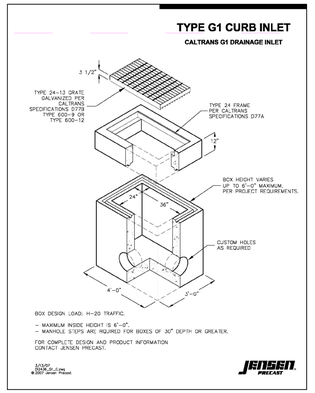
RECURRENCE	PRECIPITATION (IN)	RUNOFF (CF)	CF - ESTIMATED RUNOFF (EXISTING)	CF - ESTIMATED RUNOFF (PROPOSED)
2	2.70	12150	2070	0
10	4.10	18450	8370	0
25	4.98	22410	12330	2630
50	5.68	25560	15480	5780
100	6.40	28800	18720	9020



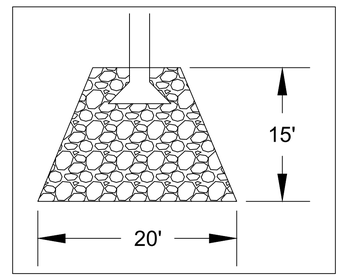
RUNOFF ESTIMATES (EXISTING & PROPOSED)
SCALE: N/A
A C-16



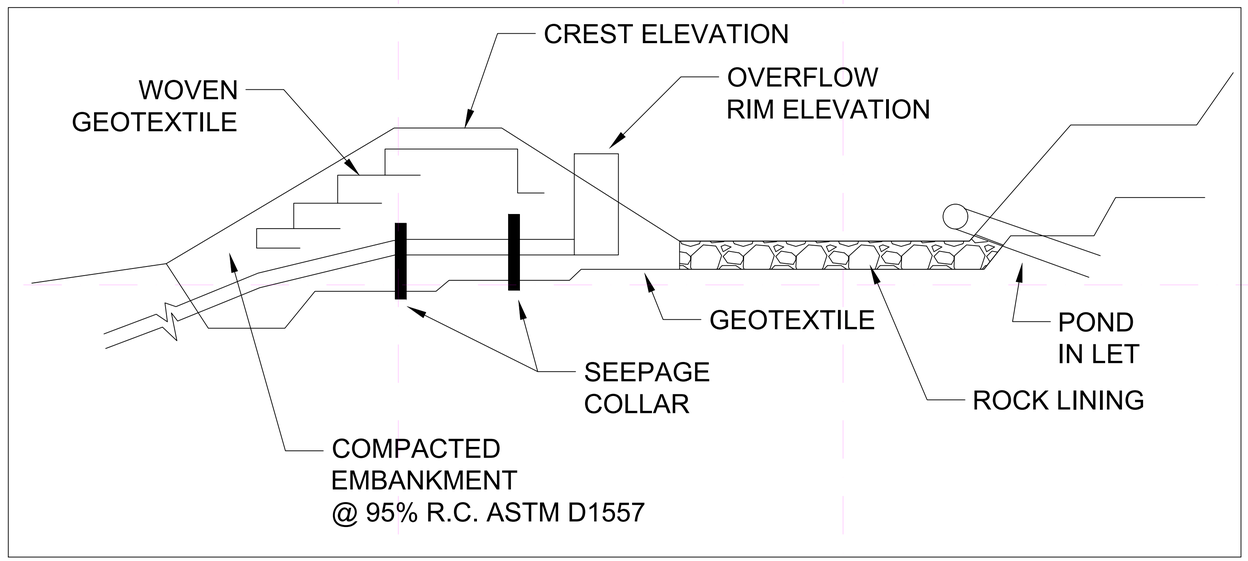
NOAA ATLAS 14 PRECIPITATION FREQUENCY
SCALE: N/A
B C-16



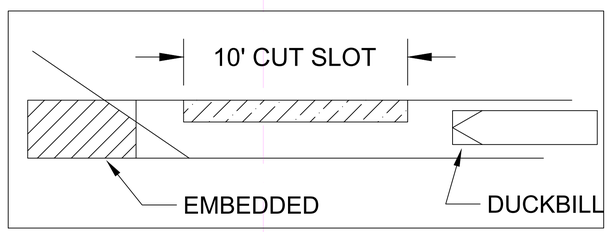
TYPICAL CATCH BASIN
SCALE: N/A
D C-16



RIP RAP OUTLET APRON
SCALE: N/A
F C-16



TYPICAL POND SECTION
SCALE: N/A
C C-16



INFILTRATION POND INLET
SCALE: N/A
E C-16

MARK	DESCRIPTION	DATE	APPR
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER — Russ Storesund — NO. C 64473 — EXP 06/30/2023 — CIVIL — STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER — Russ Storesund — NO. GE2355 — EXP 06/30/2023 — GEOTECHNICAL — STATE OF CALIFORNIA

DESIGNED BY: DWN BY: CKD BY: SUBMITTED BY: DATE: SOLICITATION NO.: CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
164 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

DRAINAGE DETAILS

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-18
SHEET 20 OF 24

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CONSTRUCTION ENTRANCE

EROSION CONTROL
(HYDROSEED & STRAW WATTLES)
APPROX 62,000 SF

MATERIAL STAGING AND STOCKPILE AREAS
CONCRETE WASHOUT AREAS
PORTABLE SANITATION FACILITIES AND
WASTE COLLECTION AREAS

0 200 400 Feet

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. C 64711
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
KURT STORESUND
No. GE 2825
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO.:
CONTRACT NO.:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
154 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

EROSION CONTROL

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-19
SHEET 21 OF 24

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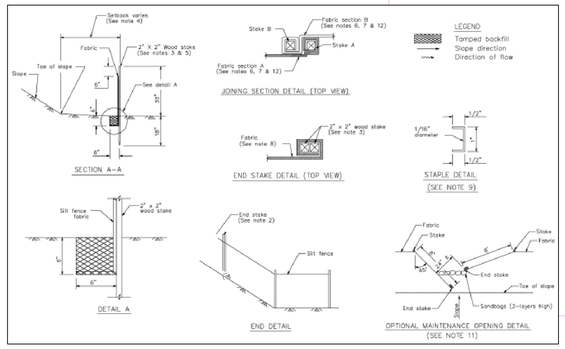
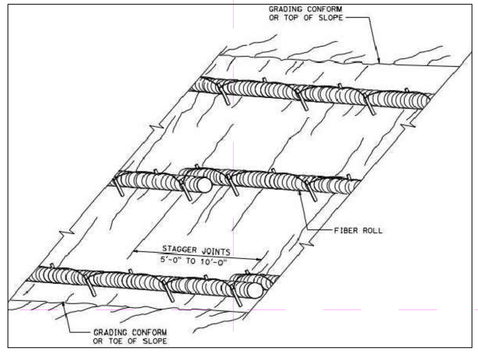


SILT FENCE DETAILS (TYP)

SCALE: AS SHOWN

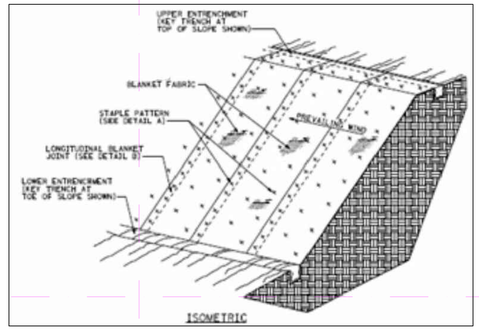
A C-19



STRAW WATTLE DETAILS (TYP)

SCALE: AS SHOWN

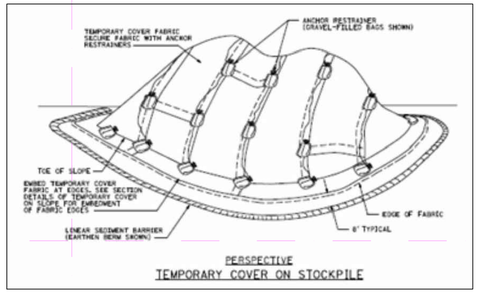
B C-19



HILLSIDE SEEDING W/ JUTE NET

SCALE: AS SHOWN

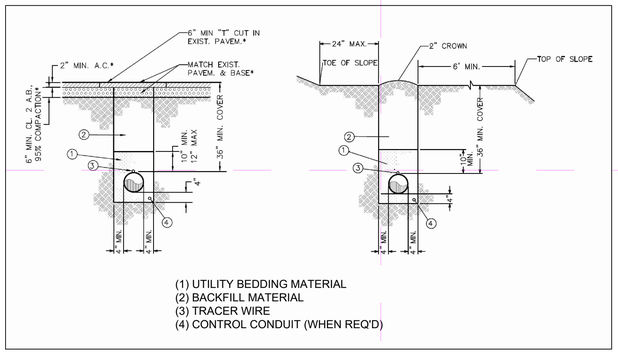
C C-19



STOCKPILE COVERING

SCALE: AS SHOWN

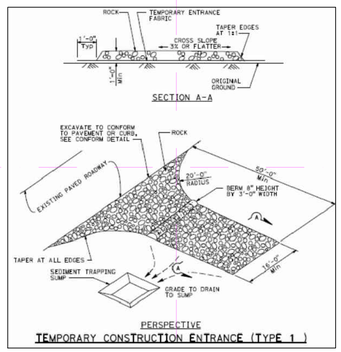
D C-19



WATER LINE TRENCH

SCALE: AS SHOWN

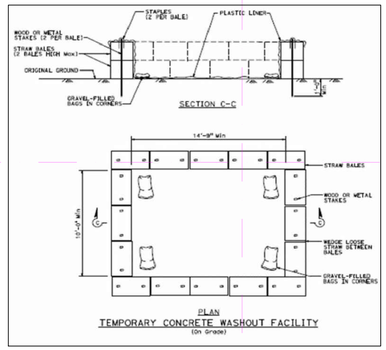
E C-19



STABILIZED ENTRANCE

SCALE: AS SHOWN

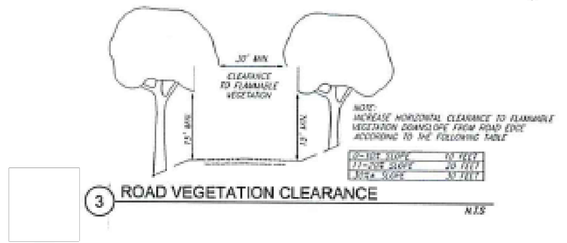
F C-19



CONCRETE WASHOUT

SCALE: AS SHOWN

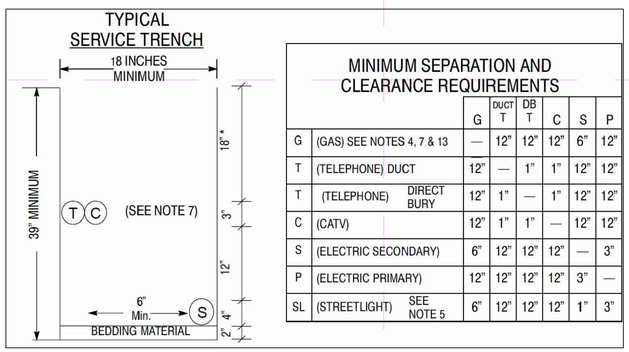
G C-19



ROAD VEGETATION CLEARANCE

SCALE: AS SHOWN

H C-19



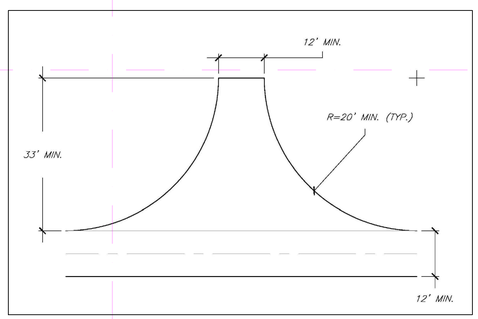
MINIMUM SEPARATION AND CLEARANCE REQUIREMENTS

		G	DUCT T	DB T	C	S	P
G	(GAS) SEE NOTES 4, 7 & 13	—	12"	12"	12"	6"	12"
T	(TELEPHONE) DUCT	12"	—	1"	1"	12"	12"
T	(TELEPHONE) DIRECT BURY	12"	1"	—	1"	12"	12"
C	(CATV)	12"	1"	1"	—	12"	12"
S	(ELECTRIC SECONDARY)	6"	12"	12"	12"	—	3"
P	(ELECTRIC PRIMARY)	12"	12"	12"	12"	3"	—
SL	(STREETLIGHT) SEE NOTE 5	6"	12"	12"	12"	1"	3"

JOINT TRENCH

SCALE: AS SHOWN

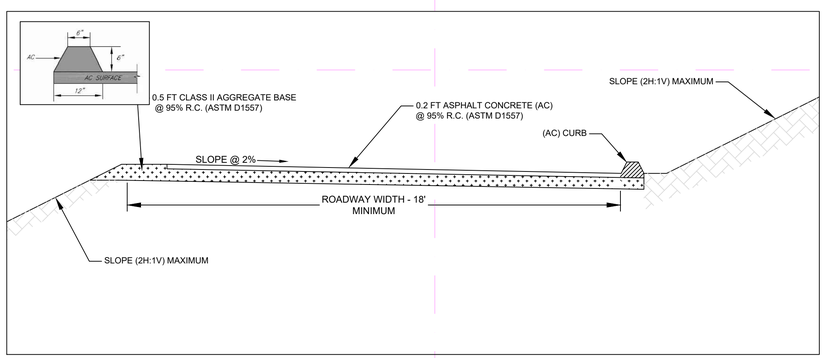
I C-19



DRIVEWAY APPROACH (FUTURE)

SCALE: AS SHOWN

J C-19



AC ROADWAY SECTION

SCALE: AS SHOWN

K C-19

811 Know what's below. Call before you dig.

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

Registered Professional Engineer — Rune Storesund — No. C 64473 — Exp 06/30/2023 — Civil — State of California

Registered Professional Engineer — Rune Storesund — No. GE2855 — Exp 06/30/2023 — Geotechnical — State of California

DESIGNED BY:
DWN BY: CKD BY:
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DATE:
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Storesund Consulting
STORESUND CONSULTING
154 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

GENERAL DETAILS

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-20
SHEET 22 OF 24

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GENERAL NOTES:

1. CONTRACTOR SHALL SUPPLY ALL MATERIALS, LABOR AND EQUIPMENT TO CONSTRUCT THE FEATURES SHOWN ON THESE PLANS AND ASSOCIATED SPECIFICATIONS.
2. CONTRACTOR SHALL SATISFY HIMSELF AS TO THE NATURE OF THE GROUND AND OTHER EXISTING CONDITIONS PRIOR TO BIDDING THE WORK. NO ADJUSTMENTS WILL BE MADE.
3. CONTRACTOR AGREES THAT, IN ACCORDANCE WITH GENERALLY ACCEPTED CONSTRUCTION PRACTICES, CONSTRUCTION CONTRACTOR WILL BE REQUIRED TO ASSUME SOLE AND COMPLETE RESPONSIBILITY FOR JOB SITE CONDITIONS DURING THE COURSE OF CONSTRUCTION OF THE PROJECT, INCLUDING THE SAFETY OF ALL PERSONS AND PROPERTY, THAT THIS REQUIREMENT SHALL BE MADE TO APPLY CONTINUOUSLY AND NOT BE LIMITED TO NORMAL WORKING HOURS, AND CONSTRUCTION CONTRACTOR FURTHER AGREES TO DEFEND, INDEMNIFY AND HOLD DESIGN PROFESSIONAL HARMLESS FROM ANY AND ALL LIABILITY, REAL OR ALLEGED, IN CONNECTION WITH THE PERFORMANCE OF WORK ON THIS PROJECT, EXCEPTING LIABILITY ARISING FROM THE SOLE NEGLIGENCE OF DESIGN PROFESSIONAL.
4. CONTRACTOR SHALL ARRANGE A PRE-CONSTRUCTION CONFERENCE WITH THE DESIGN ENGINEER AND OWNER'S REPRESENTATIVE PRIOR TO COMMENCING WORK. ALL PARTIES, THEIR REPRESENTATIVES, SHALL BE NOTIFIED 72 HOURS PRIOR TO COMMENCEMENT OF WORK AND SHALL BE KEPT INFORMED AS TO PROGRESS DURING THE COURSE OF THE WORK.
5. EXISTING DRAINAGE COURSES RECEIVING WATER FROM THIS SITE AND LOCATED THROUGHOUT THIS SITE SHALL REMAIN OPEN AND CLEAR OF DEBRIS TO PROPERLY CONVEY STORM WATER. IF EXISTING DRAINAGE COURSES RECEIVING WATERS FROM THE SITE ARE LOCATED IN THE COUNTY RIGHT-OF -WAY AND NEED MAINTENANCE, CONTACT THE DEPARTMENT OF TRANSPORTATION AND PUBLIC WORKS FOR FURTHER ASSISTANCE. IN ANY EVENT, THE OWNER AND/OR CONTRACTOR SHALL BE HELD LIABLE FOR ANY DAMAGE DUE TO OBSTRUCTING NATURAL DRAINAGE PATTERNS.
6. THE CONTRACTOR SHALL IMMEDIATELY NOTIFY THE DESIGN ENGINEER UPON DISCOVERING DISCREPANCIES, ERRORS OR OMISSIONS IN THE PLANS. PRIOR TO PROCEEDING, THE OWNER SHALL HAVE THE PLANS REVISED TO CLARIFY IDENTIFIED DISCREPANCIES, ERRORS OR OMISSIONS.
7. THE CONTRACTOR SHALL BE RESPONSIBLE FOR NOTIFYING UNDERGROUND SERVICE ALERT (U.S.A.), TOLL FREE AT 1-800-642-2444, AT LEAST TWO WORKING DAYS PRIOR TO EXCAVATION. THE CONTRACTOR SHALL UNCOVER RELEVANT UTILITIES TO VERIFY THEIR LOCATION AND ELEVATION. IF UNEXPECTED OR CONFLICTING UTILITIES ARE ENCOUNTERED DURING EXCAVATION, NOTIFY U.S.A., THE UTILITY OWNER AND/OR THE PROJECT ENGINEER IMMEDIATELY. UTILITIES INCLUDE BUT ARE NOT LIMITED TO WATER, ELECTRICAL, GAS, TELEPHONE AND CABLE/TV.
8. IN THE EVENT CULTURAL RESOURCES (I.E. HISTORICAL, ARCHAEOLOGICAL, AND PALEONTOLOGICAL RESOURCES, AND HUMAN REMAINS) ARE DISCOVERED DURING GRADING OR OTHER CONSTRUCTION ACTIVITIES, WORK SHALL BE HALTED WITHIN A 100 FOOT RADIUS OF THE FIND. THE NORTHWEST INFORMATION CENTER SHALL BE NOTIFIED AT (707) 664-0880. A QUALIFIED ARCHAEOLOGIST SHALL BE CONSULTED FOR AN ON-SITE EVALUATION. ADDITIONAL MITIGATION MAY BE REQUIRED BY THE COUNTY PER THE ARCHAEOLOGIST'S RECOMMENDATIONS. IF HUMAN BURIALS OR HUMAN REMAINS ARE ENCOUNTERED, THE CONTRACTOR SHALL ALSO NOTIFY THE COUNTY CORONER.
9. SHOULD GRADING OPERATIONS ENCOUNTER HAZARDOUS MATERIALS, OR WHAT APPEAR TO BE HAZARDOUS MATERIALS, STOP WORK IN THE AFFECTED AREA AND CONTACT 911 OR THE APPROPRIATE AGENCY FOR FURTHER INSTRUCTION.

GRADING AND DRAINAGE

1. PERFORM GRADING AND DRAINAGE IMPROVEMENTS IN ACCORDANCE WITH THE MONTEREY COUNTY CODE. APPLICABLE MONTEREY COUNTY REGULATIONS & MONTEREY COUNTY ORDINANCES & PROJECT GEOTECHNICAL RECOMMENDATIONS.
2. ALL WORK SHALL BE DONE IN COMPLIANCE WITH THE APPROVED PLANS AND SPECIFICATIONS. THE CONTRACTOR SHALL IMMEDIATELY NOTIFY THE ENGINEER OF RECORD UPON DISCOVERING DISCREPANCIES, ERRORS, OR OMISSIONS IN THE PLANS. PRIOR TO PROCEEDING, THE OWNER SHALL HAVE THE PLANS REVISED TO CLARIFY IDENTIFIED DISCREPANCIES, ERRORS, OR OMISSIONS. THE APPROVED PLANS AND SPECIFICATIONS SHALL NOT BE CHANGED WITHOUT THE WRITTEN APPROVAL OF THE MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY {RMA) BUILDING SERVICES. PROPOSED MODIFICATIONS TO THE APPROVED PLANS AND SPECIFICATIONS SHALL BE SUBMITTED TO THE PERMIT AUTHORITY IN WRITING, TOGETHER WITH ALL NECESSARY TECHNICAL INFORMATION AND DESIGN DETAILS.
3. THE GRADING/DRAINAGE PERMIT AND AN APPROVED COPY OF THE GRADING/ DRAINAGE PLANS SHALL BE MAINTAINED ON THE PROJECT SITE THROUGHOUT THE DURATION OF CONSTRUCT/ON ACTIVITIES.
4. MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY (RMA) BUILDING SERVICES MAY ORDER THAT ANY WORK STOP IMMEDIATELY IF IT IS PERFORMED CONTRARY TO THE MONTEREY COUNTY CODE, THE APPROVED PLANS AND SPECIFICATIONS. PERMIT CONDITIONS, OR ANY WORK THAT HAS BECOME HAZARDOUS TO PROPERTY OR THE PUBLIC. A GRADING/DRAINAGE PERMIT MAY BE SUSPENDED, REVOKED, OR MODIFIED BY MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY (RMA) BUILDING SERVICES.
5. ISSUANCE OF A GRADING/DRAINAGE PERMIT BY MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY (RMA) BUILDING SERVICES DOES NOT ELIMINATE THE RESPONSIBILITY OF THE OWNER TO SECURE PERMITS FROM OTHER AGENCIES WITH REGULATORY RESPONSIBILITIES FOR THE CONSTRUCTION ACTIVITIES ASSOCIATED WITH THE WORK ON THESE PLANS. FAILURE TO OBTAIN ALL REQUIRED PERMITS MAY RESULT IN FINES FROM THE RESPECTIVE AGENCY.
6. RETAINING WALLS, UNLESS EXEMPTED PER SCCCC, ARE NOT APPROVED UNDER A GRADING PERMIT. A SEPARATE BUILDING PERMIT IS REQUIRED.
7. GRADING AND DRAINAGE IMPROVEMENTS SHALL BE SET BACK FROM STREAMS, LAKES, PONDS. AND WETLANDS IN COMPLIANCE WITH THE REQUIREMENTS OF SCCCC. EXISTING VEGETATION SHALL BE RETAINED IN STREAM SETBACK AREAS TO FILTER SOIL AND OTHER POLLUTANTS CARRIED IN STORM WATER.
8. CONTOURS, ELEVATIONS, AND SHAPES OF FINISHED SURFACES SHALL BE BLENDED WITH ADJACENT NATURAL TERRAIN TO ACHIEVE A CONSISTENT GRADE AND NATURAL APPEARANCE. THE TOP OF CUT SLOPES SHALL BE ROUNDED OFF TO BLEND WITH THE NATURAL TERRAIN BORDERS OF CUT SLOPES AND FILLS SHALL BE ROUNDED OFF TO A MINIMUM RADIUS OF 5 FEET TO BLEND WITH THE NATURAL TERRAIN
9. FILL MATERIAL SHALL NOT INCLUDE ORGANIC. FROZEN, OR OTHER HAZARDOUS MATERIALS. NO ROCK OR SIMILAR IRREDUCIBLE MATERIAL GREATER THAN 6 INCHES IN ANY DIMENSION SHALL BE INCLUDED IN FILLS EXCEPT WHERE APPROVED BY THE SOILS ENGINEER. FILLS SHALL BE CONSTRUCTED IN LIFTS NOT EXCEEDING 8 INCHES IN DEPTH. COMPLETED FILLS SHALL BE STABLE; WELL-INTEGRATED, AND BONDED TO ADJACENT MATERIALS AND THE MATERIALS ON WHICH THEY REST. FILLS SHALL BE COMPETENT TO SUPPORT ANTICIPATED LOADS AND BE STABLE AT THE DESIGN SLOPES SHOWN ON THE APPROVED PLANS AND SPECIFICATIONS OR AS DIRECTED BY THE SOILS ENGINEER.
10. GROUND SURFACES SHALL BE PREPARED TO RECEIVE FILL BY REMOVING VEGETATION, TOPSOIL, AND OTHER UNSUITABLE MATERIALS, AND SCARIFYING GROUND APPROXIMATELY 4" TO 6" TO PROVIDE A BOND WITH THE FILL MATERIAL.
11. FILL SHALL NOT BE PLACED ON NATURAL SLOPES STEEPER THAN 2H:IV (50%) UNLESS SPECIFICALLY ALLOWED IN WRITING BY THE PROJECT GEOTECHNICAL ENGINEER AND APPROVED BY MONTEREY COUNTY RESOURCE MANAGEMENT AGENCY (RMA) ENVIRONMENTAL SERVICES.
12. FILLS INTENDED TO SUPPORT STRUCTURES OR SURCHARGES SHALL BE COMPACTED TO A MINIMUM OF 90% OF MAXIMUM DRY DENSITY. AS DETERMINED BY ASTM D 1557, MODIFIED PROCTOR. A HIGHER COMPACTION PERCENTAGE MAY BE REQUIRED BY THE SOILS ENGINEER.
13. STORESUND CONSULTING HAS EXERCISED A REASONABLE AND ACCEPTABLE STANDARD OF CARE IN THE PREPARATION OF THESE PLANS, HOWEVER, THE DEVELOPMENT PROCESS INCLUDES ACTIVITIES OCCURRING THROUGHOUT CONSTRUCTION. THESE ACTIVITIES INCLUDE CALCULATIONS, PLAN CHECKS AND VERIFICATIONS DURING CONSTRUCTION. SHOULD PERSONS OTHER THAN STORESUND CONSULTING PERFORM THE CONSTRUCTION STAKING OPERATION, THEY SHALL INDEMNIFY STORESUND CONSTRUCTION FROM ANY DAMAGES RESULTING FROM FAILURE TO PERFORM THESE TASKS OR ANY EXPENSES OR DAMAGE RESULTING FROM OMISSION OR ERROR CONTAINED IN THE PLANS WHICH WOULD REASONABLY HAVE BEEN DISCOVERED AND CORRECTED BY STORESUND CONSTRUCTION.
14. PRIOR TO ANY CORRECTIVE ACTION BY THE CONTRACTOR WHICH IS NECESSARY DUE TO ANY ALLEGED STAKING ERROR, THE CONTRACTOR SHALL NOTIFY THE ENGINEER FOR RE-STAKING AND VERIFICATION OF PREVIOUS STAKING. SHOULD ANY CORRECTIVE WORK BE DONE PRIOR TO NOTIFICATION, OR IF THE ORIGINAL STAKING IS DONE BY OTHERS, STORESUND CONSULTING ASSUMES NO LIABILITIES FOR THE COSTS INCURRED FOR THIS WORK WHERE IT HAS BEEN DETERMINED THAT ANY CORRECTIVE ACTION WILL REQUIRE FINANCIAL PARTICIPATION BY THE ENGINEER, THAT AMOUNT SHALL BE AGREED TO BY THE ENGINEER IN WRITING PRIOR TO TAKING CORRECTIVE ACTION FAILURE TO OBTAIN WRITTEN ACCEPTANCE BY THE ENGINEER WILL NEGATE ALL REQUIREMENTS OF HIS FINANCIAL ASSISTANCE.
15. REFER TO THE PROJECT GEOTECHNICAL REPORT FOR ADDITIONAL AND OVERRIDING SPECIFICATIONS.
16. DRAINAGE CALCULATIONS ASSOCIATED WITH THESE PLANS WERE PREPARED BASED ON CURRENT AGENCY STANDARDS. THE OWNER SHALL BE RESPONSIBLE FOR ROUTINE MAINTENANCE TO THE STORM DRAIN NETWORK TO ENSURE FREE FLOW.

EROSION PREVENTION AND SEDIMENT CONTROL NOTES:

1. PERFORM EROSION PREVENTION AND SEDIMENT CONTROL IN ACCORDANCE WITH THE LATEST EDITION OF THE CALIFORNIA BUILDING CODE, APPLICABLE COUNTY REGULATIONS, AND SECTION 20 OF THE CALTRANS STANDARD SPECIFICATIONS.
2. THE APPROVED PLANS SHALL CONFORM WITH THE EROSION PREVENTION AND SEDIMENT CONTROL BEST MANAGEMENT PRACTICES CONTAINED IN THE LATEST EDITIONS OF THE FOLLOWING PUBLICATIONS OR AN EQUIVALENT BEST MANAGEMENT PRACTICE:

   2.1. EROSION AND SEDIMENT CONTROL FIELD MANUAL BY THE SAN FRANCISCO BAY REGIONAL WATER QUALITY CONTROL BOARD;
   2.2. MANUAL OF STANDARDS FOR EROSION & SEDIMENT CONTROL MEASURES BY THE ASSOCIATION OF BAY AREA GOVERNMENTS;
   2.3. CONSTRUCTION SITE BEST MANAGEMENT PRACTICE HANDBOOK BY CALTRANS;
   2.4. STORMWATER BEST MANAGEMENT PRACTICE HANDBOOK BY THE CALIFORNIA STORMWATER QUALITY ASSOCIATION.

3. IF DISCREPANCIES OCCUR BETWEEN THESE NOTES, MATERIALS REFERENCED HEREIN OR MANUFACTURER'S RECOMMENDATIONS, THEN THE MOST PROTECTIVE SHALL APPLY.
4. THE OWNER IS RESPONSIBLE FOR OBTAINING AND COMPLYING WITH THE NATIONAL POLLUTION DISCHARGE ELIMINATION SYSTEM (NPDES) GENERAL PERMIT NO. CAS000002 WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES OF STORM WATER RUNOFF ASSOCIATED WITH CONSTRUCTION ACTIVITY DISTURBING LAND EQUAL TO OR GREATER THAN ONE ACRE. CONSTRUCTION ACTIVITIES INCLUDE BUT ARE NOT LIMITED TO CLEARING, GRADING, EXCAVATION, STOCKPILING, AND RECONSTRUCTION OF EXISTING FACILITIES INVOLVING REMOVAL AND REPLACEMENT.
5. PRESERVATION OF EXISTING VEGETATION SHALL OCCUR TO THE MAXIMUM EXTENT PRACTICABLE.
6. THE CONTRACTOR IS RESPONSIBLE FOR PREVENTING STORM WATER POLLUTION GENERATED FROM THE CONSTRUCTION SITE. THE CONTRACTOR MUST IMPLEMENT AN EFFECTIVE COMBINATION OF EROSION PREVENTION AND SEDIMENT CONTROL ON ALL DISTURBED AREAS DURING THE RAINY SEASON (OCTOBER 15 - APRIL 15).
7. EROSION PREVENTION AND SEDIMENT CONTROL MEASURES SHALL BE INSPECTED BY THE CONTRACTOR BEFORE FORECASTED STORM EVENTS AND AFTER ACTUAL STORM EVENTS TO ENSURE MEASURES ARE FUNCTIONING PROPERLY. STORM EVENTS PRODUCE AT LEAST 1 INCH OF PRECIPITATION IN A 24 HOUR PERIOD. EROSION PREVENTION AND SEDIMENT CONTROL MEASURES THAT HAVE FAILED OR ARE NO LONGER EFFECTIVE SHALL BE PROMPTLY REPLACED. EROSION PREVENTION AND SEDIMENT CONTROL MEASURES SHALL BE MAINTAINED UNTIL DISTURBED AREAS ARE STABILIZED.
8. CONTRACTOR IS RESPONSIBLE FOR DEVELOPMENT AND IMPLEMENTATION OF AN APPROPRIATE STORM WATER POLLUTION PREVENTION PLAN. CHANGES TO THE EROSION PREVENTION AND SEDIMENT CONTROL PLAN MAY BE MADE TO RESPOND TO FIELD CONDITIONS. CHANGES SHALL BE NOTED ON THE PLAN WHEN MADE.
9. DISCHARGES OF POTENTIAL POLLUTANTS FROM CONSTRUCTION SITES SHALL BE PREVENTED USING SOURCE CONTROLS TO THE EXTENT PRACTICABLE. POTENTIAL POLLUTANTS INCLUDE BUT ARE NOT LIMITED TO: SEDIMENT, TRASH, NUTRIENTS, PATHOGENS, PETROLEUM HYDROCARBONS, METALS, CONCRETE, CEMENT, ASPHALT, LIME, PAINT, STAINS, GLUES, WOOD PRODUCTS, PESTICIDES, HERBICIDES, CHEMICALS, HAZARDOUS WASTE, SANITARY WASTE, VEHICLE OR EQUIPMENT WASH WATER AND CHLORINATED WATER.
10. ENTRANCE(S) TO THE CONSTRUCTION SITE SHALL BE MAINTAINED IN A CONDITION THAT WILL PREVENT OR FLOWING OF POTENTIAL POLLUTANTS OFFSITE. POTENTIAL POLLUTANTS DEPOSITED ON PAVED ARES WITHIN THE COUNTY RIGHT-OF-WAY, SUCH AS ROADWAYS AND SIDEWALKS, SHALL BE PROPERLY DISPOSED OF AT THE END OF EACH WORKING DAY OR MORE FREQUENTLY AS NECESSARY.
11. WHENEVER IT IS NOT POSSIBLE TO UTILIZE EROSION PREVENTION MEASURES, EXPOSED SLOPES SHALL EMPLOY SEDIMENT CONTROL DEVICES, SUCH AS FIBER ROLLS AND SILT FENCES. FIBER ROLLS AND SILT FENCES SHALL BE TRENCHED AND KEYED INTO THE SOIL AND INSTALLED ON CONTOUR.
12. SOIL AND MATERIAL STOCKPILES SHALL BE PROPERLY PROTECTED TO MINIMIZE SEDIMENT AND POLLUTANT TRANSPORT FROM THE CONSTRUCTION SITE.
13. SOLID WASTE, SUCH AS TRASH, DISCARDED BUILDING MATERIALS AND DEBRIS, SHALL BE PLACED IN DESIGNATED COLLECTION AREAS OR CONTAINERS. THE CONSTRUCTION SITE SHALL BE CLEARED OF SOLID WASTE DAILY, OR AS NECESSARY, AND REGULAR REMOVAL AND PROPER DISPOSAL SHALL BE ARRANGED.
14. A CONCRETE WASHOUT AREAS, SUCH AS A TEMPORARY PIT, SHALL BE DESIGNATED TO CLEAN CONCRETE TRUCKS AND TOOLS (AS REQUIRED). AT NO TIME SHALL CONCRETE PRODUCTS AND WASTE BE ALLOWED TO ENTER COUNTY WATERWAYS SUCH AS CREEKS OR STORM DRAINS.
15. PROPER APPLICATION, CLEANING AND STORAGE OF POTENTIALLY HAZARDOUS MATERIALS, SUCH AS PAINTS AND CHEMICALS, SHALL BE CONDUCTED TO PREVENT THE DISCHARGE OF POLLUTANTS.
16. WHEN UTILIZED, TEMPORARY RESTROOMS AND SANITARY FACILITIES SHALL BE LOCATED AND MAINTAINED TO PREVENT THE DISCHARGE OF POLLUTANTS.
17. APPROPRIATE VEHICLE STORAGE, FUELING, MAINTENANCE AND CLEANING AREAS SHALL BE DESIGNATED AND MAINTAINED TO PREVENT DISCHARGE OF POLLUTANTS.

FIRE PREVENTION NOTES

ALL INTERNAL COMBUSTION ENGINES SHALL BE FITTED WITH SPARK ARRESTORS. CONTRACTOR SHALL HAVE AN APPROPRIATE FIRE EXTINGUISHER AND FIRE FIGHTING TOOLS (SHOVEL AND AXE AT A MINIMUM) PRESENT AT ALL TIMES WHEN THERE IS AN ELEVATED LIKELIHOOD OF FIRE. VEHICLES SHALL NOT BE PARKED IN ANY TALL GRASS OR ANY OTHER LOCATION WHERE HEAT FROM EXHAUST COULD IGNITE A FIRE. CONTRACTOR SHALL FOLLOW ANY ADDITIONAL RULES THE LANDOWNER HAS FOR FIRE PREVENTION.

TREE PROTECTION

1. PLASTIC TREE PROTECTION FENCING SHOULD BE INSTALLED AT THE DRIP LINES OF TREES TO REMAIN IN CONSTRUCTION ZONE (OR THE OUTER EDGE OF THE DRIP LINE OF GROUPS OF TREES) IF ACCESS WITHIN DRIP LINE WILL BE REQUIRED, FENCE TO BE PLACED AT EXPECTED LIMIT OF GRADING IT SHOULD BE INSTALLED PRIOR TO THE START OF CLEARING OR GRADING OPERATIONS, AND KEPT IN PLACE THROUGHOUT CONSTRUCTION ACTIVITIES.
2. WHEN PRUNING FOR CLEARANCE IS REQUIRED ON ANY TREES TO REMAIN, IT SHOULD BE DONE BY TRAINED QUALIFIED TREE WORKERS ACCORDING TO ISA PRUNING GUIDELINES PRIOR TO CONSTRUCTION PRUNING SHOULD BE THE MINIMUM NECESSARY FOR HAZARD REDUCTION, (IE THE REMOVAL OF DEADWOOD 2" AND LARGER, ETC.) AND CLEARANCE.
3. IF ANY ROOTS LARGER THAN 1" ARE ENCOUNTERED, FOR TREES TO BE SAVED, THEY SHOULD BE CUT CLEANLY ACROSS THE FACE OF THE ROOT WITH A SHARP SAW ROOTS SHALL BE KEPT MOIST WHILE EXPOSED.
4. WOOD CHIP MULCH GENERATED FROM PRUNING AND REMOVALS CAN BE SPREAD UNDER REMAINING TREES ONSITE TO SERVE AS PERMANENT TOP DRESSING AND MULCH.
5. NO PARKING. OPERATION OF EQUIPMENT, STORAGE OF MATERIALS. DISPOSAL OF WASTE OR OTHER CONSTRUCTION ACTIVITY SHALL OCCUR WITHIN DRIP LINES OF PROTECTED TREES.
6. OWNERS SHALL BE RESPONSIBLE FOR CONSULTING WITH ARBORIST REGARDING CONSTRUCTION IMPACTS ON EXISTING TREES.

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER — KURT STORESUND — NO. C 64473 — EXP 06/30/2023 — CIVIL — STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER — KURT STORESUND — NO. GE2855 — EXP 06/30/2023 — GEOTECHNICAL — STATE OF CALIFORNIA

DATE:
SOLICITATION NO:
CONTRACT NO:
DESIGNED BY:
CKD BY:
DWN BY:
SUBMITTED BY:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

Storesund Consulting
STORESUND CONSULTING
154 LAWSON ROAD
KENSINGTON, CA 94707
(510) 526-5849

NOTES

VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-20
SHEET 22 OF 24

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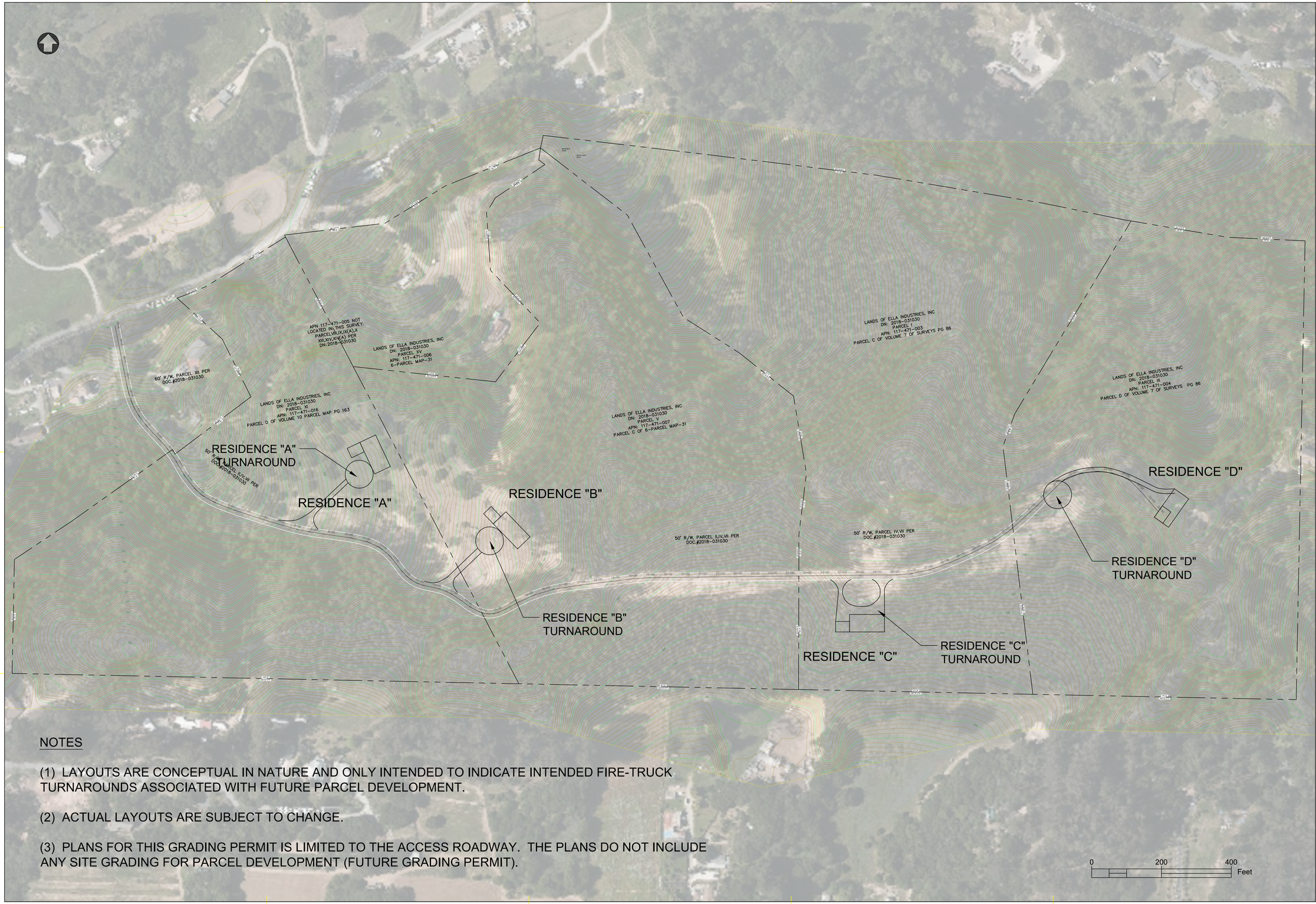

NOTES

(1) LAYOUTS ARE CONCEPTUAL IN NATURE AND ONLY INTENDED TO INDICATE INTENDED FIRE-TRUCK TURNAROUNDS ASSOCIATED WITH FUTURE PARCEL DEVELOPMENT.

(2) ACTUAL LAYOUTS ARE SUBJECT TO CHANGE.

(3) PLANS FOR THIS GRADING PERMIT IS LIMITED TO THE ACCESS ROADWAY. THE PLANS DO NOT INCLUDE ANY SITE GRADING FOR PARCEL DEVELOPMENT (FUTURE GRADING PERMIT).

MARK	DESCRIPTION	DATE	APPR.
1	GRADING PERMIT PLAN SET	05/10/2022	RS

REGISTERED PROFESSIONAL ENGINEER
Rune Storesund
NO. C 64473
EXP 06/30/2023
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
Rune Storesund
NO. GE2855
EXP 06/30/2023
GEOTECHNICAL
STATE OF CALIFORNIA

DESIGNED BY:
DWN BY:
CKD BY:
SUBMITTED BY:
DATE:
SOLICITATION NO:
CONTRACT NO:
FOR REDUCED PLANS ORIGINAL SCALE INCHES 0 1 2 3

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STORESUND CONSULTING
1541 LAWSON ROAD
KENSINGTON, CA 94707
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ENVISIONED DEVELOPMENT
VEGA ROAD PROPERTIES PROJECT
146 VEGA ROAD
ROYAL OAKS, CA 95076

SHEET IDENTIFICATION
C-22
SHEET 24 OF 24

Exhibit E

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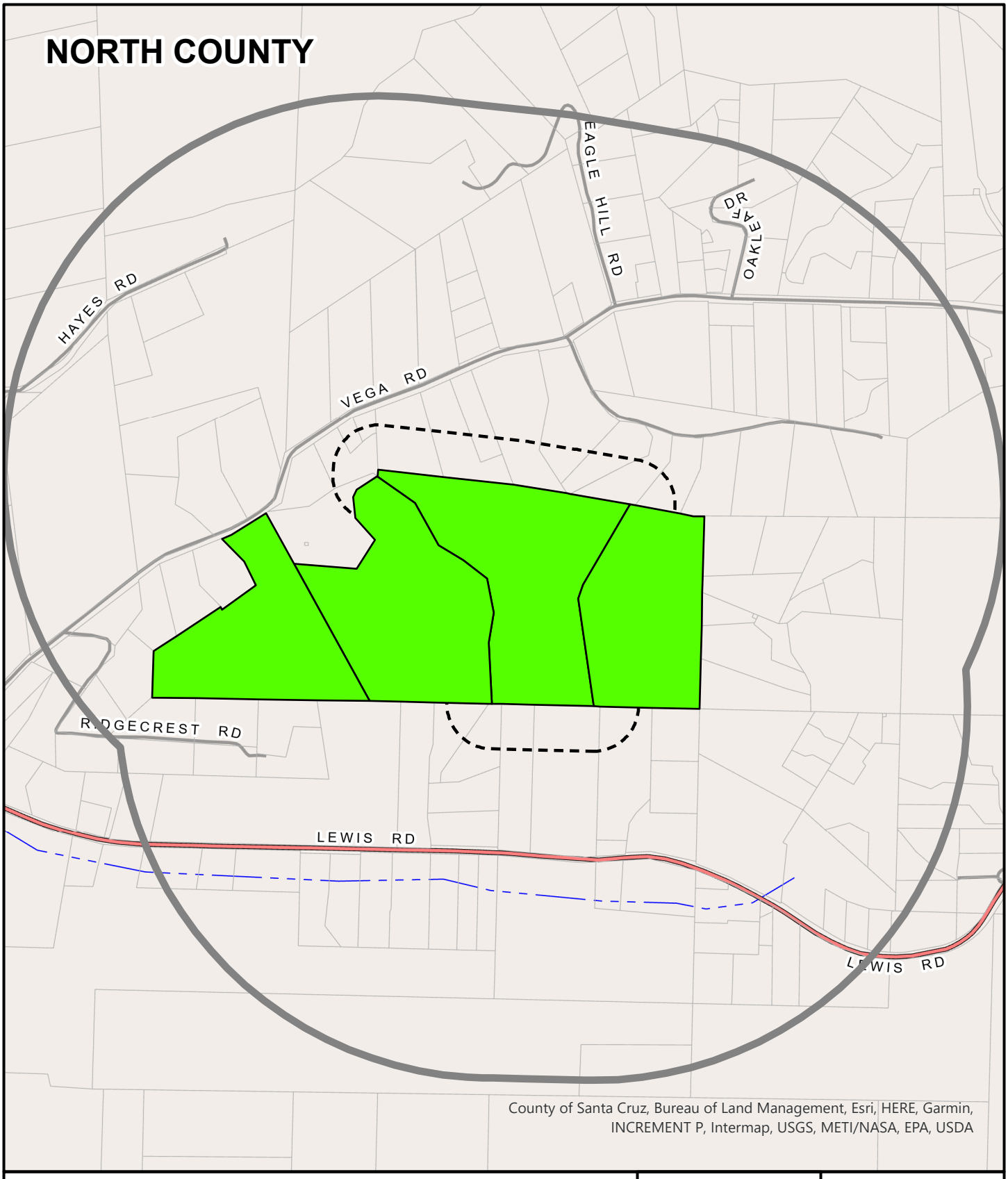

APPLICANT: ELLA INDUSTRIES INC

APN: 117471003000,117471004000,1 **FILE #** PLN190155

Project Site | 300 FT Buffer | 2500 FT Buffer

N

0 600

Feet

PLANNER: HYA HONORA

2016

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Introduced: 3/5/2024
Version: 1

Current Status: Agenda Ready
Matter Type: Planning Item

REF140023 - UPDATE TO ZONING MAPS AND CLASSIFICATIONS
a. Receive a status update on the project to implement the 2010 General Plan (inland areas of unincorporated Monterey County) land use designations, which necessitates updates to the zoning maps and associated Title 21 additions and amendments; and
b. Provide input to staff.
Project Location: Countywide (Non-Coastal (Inland) Areas)
Proposed CEQA action: Consider and find this workshop is statutorily exempt per Section 15262 of the CEQA guidelines.

RECOMMENDATION:
It is recommended that the Planning Commission:
a. Receive a status update on the project to implement the 2010 General Plan (inland areas of unincorporated Monterey County) land use designations, which necessitates updates to the zoning maps and associated Title 21 additions and amendments; and
b. Provide input to staff.

SUMMARY:
The adoption of the 2010 General Plan for the unincorporated inland areas of Monterey County necessitates that all inland zoning maps be updated to implement the land use designations of the 2010 General Plan. This project began in 2014 and was presented to the Planning Commission in 2014 and 2015. The project was included last year as a part of the Long Range Work Program (LRWP), and staff has completed preliminary work on reviewing the current land use and zoning maps and identified the areas where updates need to occur.

Today, staff is presenting the current project which is a direct implementation of the 2010 General Plan policies. Therefore, the policy discussion and direction were previously vetted during the General Plan process. These General Plan policies and land use designations require codification into Title 21 of the Monterey County Code and necessitate updates to the County's zoning maps.

The original project was incomplete due to staff turnover and other priorities. A portion of the original project was implemented as a separate project, the Mixed Use Zoning District (Chapter 21.17), which the Board of Supervisors adopted on July 7, 2020.

Staff has begun the preliminary work to implement the project this year. The following is a highlight of what is included as a part of the current project implementation:

- Updates to the County's zoning maps to implement the 2010 General Plan land use designations.
- Amendment to Chapter 21.08 (Establishment and Designation of Zoning Districts) to codify the transition from Sectional District Maps to GIS shapefiles.
- Amendment to Chapter 21.39 (Community Plan Zoning District) to codify this section is applicable to adopted Community Plans and Master Plans.
- Amendment to Chapter 21.50 (Urban Reserves Zoning District) to codify that staff needs to review Board adopted Memorandum of Agreements and Memorandum of Understanding between the County and cities for applicable development occurring in the unincorporated County.
- Implementation of the Agricultural and Winery Corridor Plan (AWCP) will result in a new Chapter being added to Title 21.

Portions of this original project will be implemented as future projects, given the time lag between when the project was begun and subsequent actions to date. These future projects will be expected to begin depending on existing staff priorities, as outlined in the Long Range Work Program, and how these projects dovetail with the implementation of the 6th Cycle Housing Element. The following are the future projects that were included in the original project scope:

- Implementation of the Affordable Housing Overlay (AHO) may result in a General Plan amendment and a new Chapter being added to Title 21.
- Updates to the Fort Ord Master Plan (FOMP), associated land use designation, and zoning maps.

DISCUSSION

To read the full discussion and background, please refer to the Detailed Discussion included as Exhibit A.

Staff recommends that the Planning Commission receive staff's presentation on the project and provide input to staff.

OTHER AGENCY INVOLVEMENT

Housing and Community Development Department staff will work with ITD for updates to the GIS maps and Office of County Counsel to review the draft ordinances as they are developed.

Prepared by: Taylor Price, Associate Planner, (831) 784-5730
Approved by: Melanie Beretti, AICP, Acting Chief of Planning

The following attachment is on file with HCD:
Exhibit A - Detailed Discussion

County of Monterey Planning Commission

Item No.5

Board of Supervisors
Chambers
168 W. Alisal St., 1st Floor
Salinas, CA 93901

March 13, 2024

Agenda Item No. 5

Legistar File Number: PC 24-022

Introduced: 3/5/2024
Version: 1

Current Status: Agenda Ready
Matter Type: Planning Item

REF140023 - UPDATE TO ZONING MAPS AND CLASSIFICATIONS

a. Receive a status update on the project to implement the 2010 General Plan (inland areas of unincorporated Monterey County) land use designations, which necessitates updates to the zoning maps and associated Title 21 additions and amendments; and
b. Provide input to staff.

Project Location: Countywide (Non-Coastal (Inland) Areas)

Proposed CEQA action: Consider and find this workshop is statutorily exempt per Section 15262 of the CEQA guidelines.

RECOMMENDATION:

It is recommended that the Planning Commission:
a. Receive a status update on the project to implement the 2010 General Plan (inland areas of unincorporated Monterey County) land use designations, which necessitates updates to the zoning maps and associated Title 21 additions and amendments; and
b. Provide input to staff.

SUMMARY:

The adoption of the 2010 General Plan for the unincorporated inland areas of Monterey County necessitates that all inland zoning maps be updated to implement the land use designations of the 2010 General Plan. This project began in 2014 and was presented to the Planning Commission in 2014 and 2015. The project was included last year as a part of the Long Range Work Program (LRWP), and staff has completed preliminary work on reviewing the current land use and zoning maps and identified the areas where updates need to occur.

Today, staff is presenting the current project which is a direct implementation of the 2010 General Plan policies. Therefore, the policy discussion and direction were previously vetted during the General Plan process. These General Plan policies and land use designations require codification into Title 21 of the Monterey County Code and necessitate updates to the County's zoning maps.

The original project was incomplete due to staff turnover and other priorities. A portion of the original project was implemented as a separate project, the Mixed Use Zoning District (Chapter 21.17), which the Board of Supervisors adopted on July 7, 2020.

Staff has begun the preliminary work to implement the project this year. The following is a highlight of what is included as a part of the current project implementation:

- Updates to the County's zoning maps to implement the 2010 General Plan land use designations.
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- Amendment to Chapter 21.50 (Urban Reserves Zoning District) to codify that staff needs to review Board adopted Memorandum of Agreements and Memorandum of Understanding between the County and cities for applicable development occurring in the unincorporated County.
- Implementation of the Agricultural and Winery Corridor Plan (AWCP) will result in a new Chapter being added to Title 21.

Portions of this original project will be implemented as future projects, given the time lag between when the project was begun and subsequent actions to date. These future projects will be expected to begin depending on existing staff priorities, as outlined in the Long Range Work Program, and how these projects dovetail with the implementation of the 6th Cycle Housing Element. The following are the future projects that were included in the original project scope:

- Implementation of the Affordable Housing Overlay (AHO) may result in a General Plan amendment and a new Chapter being added to Title 21.
- Updates to the Fort Ord Master Plan (FOMP), associated land use designation, and zoning maps.

DISCUSSION

To read the full discussion and background, please refer to the Detailed Discussion included as Exhibit A.

Staff recommends that the Planning Commission receive staff's presentation on the project and provide input to staff.

OTHER AGENCY INVOLVEMENT

Housing and Community Development Department staff will work with ITD for updates to the GIS maps and Office of County Counsel to review the draft ordinances as they are developed.

Prepared by: Taylor Price, Associate Planner, (831) 784-5730
Approved by: Melanie Beretti, AICP, Acting Chief of Planning

The following attachment is on file with HCD:

Exhibit A - Detailed Discussion

Exhibit A

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Exhibit A

DETAILED DISCUSSION

The County of Monterey (County) adopted the 2010 General Plan (2010 GP) on October 26, 2010. Staff originally began working on updating the zoning maps and zoning classifications as a part of the 2010 GP implementation in 2014. Staff conducted the first public workshop at the Planning Commission (Commission) on December 10, 2014 (staff report and exhibits: https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:87338aa2-7924-48be-8786-af0d105f0b6b). Staff returned to the Commission on October 15, 2015, with proposed new Chapters to Title 21 and updates to the zoning maps (staff report and exhibits: https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:55a6b955-9d98-4f26-974b-1c6f002489e5). The Commission hearing on October 15, 2015, was continued to November 12, 2015, with updates to the proposed new Chapters to Title 21 inclusive of Commissioner and public input (staff report and exhibits: https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:8f2fea87-9714-49d1-9d66-843736cc0356). Due to staff turnover and the urgency of other projects, the original project was never completed. One portion of the original project that was implemented was the Mixed Use Zoning District, which was adopted by the Board of Supervisors on July 7, 2020, by Ordinance 5334. Ordinance 5334 added the Mixed Use Zoning District to Title 21 as Chapter 21.17.

The underlying project of updating the zoning maps to implement the 2010 GP land use designations was never completed. This resulted in the current zoning maps not reflecting the adopted land use designations from the 2010 GP for the inland areas of unincorporated Monterey County. The original project had a broad scope; the current project, which staff has begun preliminary work on to implement this year, includes updating the zoning maps, amending three existing Chapters of Title 21, and adding a new Chapter to Title 21.

Distinction between land use and zoning

The difference between land use designation and zoning is summarized here briefly. The land use designation outlines and details the proposed general distribution and location of various types of uses within a specific area. For example, land use designation addresses questions such as where residential development and industrial development should occur within a jurisdiction. The land use designation is generally outlined in a General Plan's Land Use Element and is intended to reflect the community's desired future development patterns for an area.[1] Land use designates the general locations and intensity of development and is intended to serve as the community's vision of development. There is no requirement that there is a one-to-one relationship between the land use designation and zoning, even though in Monterey County, there often is a one-to-one relationship.[2] Zoning is intended to implement the land use designation and sets design and development requirements, such as parking requirements, lot coverage, structure height, and setbacks. Zoning laws are adopted pursuant to Article XI, section 7 of the California Constitution. Zoning defines the specific allowable uses of a parcel and the requirements and limitations to development on a specific parcel. Zoning regulations also create the approval process, determine the appropriate hearing authority, and establish standards for project review, such as what uses are allowed and conditionally allowed.

[1] The State of California requires that the land use element "designate the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space…". California Government Code section 65302.a.

[2] State of California. Governor's Office of Planning and Research. (2023). Chapter 4 Required Elements.

Exhibit A

Project Scope
The current project scope will consist of updates to the zoning maps to reflect the adopted 2010 GP land use designations and any necessary edits to Title 21 that may be required. Implementing the Agricultural and Winery Corridor Plan (AWCP) will also be a part of the current project scope, resulting in a new Chapter being added to Title 21.

In addition to updating the zoning maps to be reflective of the 2010 GP land use designations, staff recommends that all future zoning map updates only occur as a Geographic Information System (GIS) based process, where the maps are stored electronically and are no longer based on physical Sectional District Maps. The old Sectional District Map process is out of date with today's technology and was based on a time when staff would use physical zoning maps. Most other jurisdictions utilize a GIS system for their zoning maps. This update will necessitate updating Chapter 21.08 to codify the transition from Sectional District Maps to GIS shapefiles. Staff will work with County Counsel and the County of Monterey's Information Technology Department (ITD) to ensure that Chapter 21.08 is updated appropriately to codify this transition.

Codifying the GIS zoning map update process has also alerted staff to the necessity of updating Chapter 21.50 to codify that staff should review Board of Supervisors approved Memorandums of Understanding (MOUs) and Memorandums of Agreement (MOAs) between Salians Valley Cities and the County when reviewing development projects within certain cities' Spheres of Influence (SOIs) and urban growth boundaries. Development projects that fall within the MOU and MOA boundaries have certain requirements for development review, and annexation triggers that staff must consider when reviewing specific projects.

As staff recommends not updating the Fort Ord Master Plan (FOMP) and its land use designations as a part of the current project scope, staff is recommending that the Fort Ord Master Plan Area is rezoned from its current zoning of Public/Quasi-Public Zoning District (PQP) to Community Plan Zoning District (CP). This would be an interim step to updating the FOMP and its land use designations. Zoning the Fort Ord Master Plan Area to CP would allow the zoning maps in the Fort Ord Master Plan Area to reflect the current land use designations in the FOMP. This rezone in the Fort Ord Master Plan Area would necessitate an update to Chapter 21.39, which details Community Plan Zoning District regulations, to reference both Community and Master Plans. In addition, updating the "CP" District would allow for development in the Fort Ord Master Plan Area based on the specific development policies and land use designations in the adopted Fort Ord Master Plan Area.

Finally, staff will be implementing the AWCP (Chapter 9.J of the 2010 GP), which will necessitate adding a Chapter to Title 21. The AWCP was developed to facilitate a planned approach and long-term vision for the development of agricultural and winery uses in the Agricultural and Winery Corridor Plan Area (AWCP Area). The AWCP Area is intended to overlay on top of the three Area Plans it is within (Toro, Central Salinas Valley, and South County). The AWCP has three segments as part of the broader AWCP Area: the River Road Segment, the Jolon Road Segment, and the Metz Road Segment. Each of these segments has a specific number of facilities that are allowed to be processed under the AWCP development standards and design guidelines. Staff will begin this process by working with the Agricultural

Advisory Committee (AAC) on the new Chapter of Title 21 before returning to the Commission for their recommendation.

Future Projects

Portions of the original project that are not included in the current project scope will be implemented as future projects based on current conditions and priorities, staff availability, and their interaction with the implementation of the 6th Cycle Housing Element (Housing Element). The two future projects are the implementation of the Affordable Housing Overlay (AHO)[3] and the update to the FOMP.

The AHO was created by the 2010 GP Land Use Element Policy LU-2.11 and was intended to encourage the development of affordable and workforce housing. The AHO has yet to be implemented by creating a new Chapter in Title 21. AHO implementation was part of the original project scope, and draft AHO language was presented to the Commission during the October 28, 2015, and November 15, 2015, hearings. The October 28, 2015, staff report noted that implementation of the AHO would require an addendum to the General Plan Final Environmental Impact Report (FEIR). Due to significant changes in state housing laws, the draft AHO language presented to the Commission in 2015 is no longer consistent with state requirements. In addition, changes in State housing laws will require staff to amend the 2010 GP when implementing the AHO. Therefore, AHO implementation or revision will be a separate project that may be a part of the Housing Element implementation. Implementing or revising the AHO as a part of the Housing Element implementation would allow for California Environmental Quality Act (CEQA) review to be conducted as a part of the Housing Element implementation.

The 2010 GP designated Fort Ord as a community area and the FOMP as the Community Plan for the Fort Ord Master Plan Area. The FOMP land use maps are currently outdated and do not accurately reflect the open space and development areas in the Fort Ord Master Plan Area. In 2014, when staff brought the concept of updating the FOMP to the Commission, the Commission recommended that an Ad Hoc Committee be formed to begin working with staff and the Fort Ord community to update the FOMP. When the FOMP update begins, staff will return to the Commission seeking direction before staff begins the FOMP update project.

[3] The Affordable Housing Overlay (AHO) is outlined by the 2010 General Plan Land Use Element Policy LU-2.11.

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Introduced: 3/7/2024
Version: 1

Current Status: Agenda Ready
Matter Type: Planning Item

PLANNING COMMISSION REFERRAL 19.01 QUARTERLY REPORT OF AFFORDABLE AND WORKFORCE HOUSING APPLICATIONS RECEIVED BY THE COUNTY

At its November 13, 2019, meeting, the Planning Commission requested staff to provide quarterly reports related to affordable and workforce housing applications received by the County. At the Planning Commission's October 26, 2022, meeting it was further requested that pending and approved accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) be added to the report.

Annually, the County reports to California Housing & Community Development (CA HCD) on our progress toward meeting our Regional Housing Needs Allocation (RHNA). This report provides the information reported annually and throughout the course of the past Housing Element cycle (the 5th cycle covering the period from 2015-2023) in response to the Planning Commissions referral. Work on the 6th cycle Housing Element is currently in progress.

Policies and Background Information:
Before reviewing the data on housing applications, an understanding of the how Monterey County Housing & Community Development (HCD) considers housing projects is important to understand. When HCD receives an application, a permit determination is made with reference to zoning regulations and other applicable laws that apply to the proposed use or development.

Single family residential uses - Using a typical residential property development example, a single-family home (unrestricted for affordability), can be permitted with a ministerial building permit in some areas, or the need for a discretionary planning entitlement may be triggered before a building permit can be issued in other areas. This largely depends on location, zoning designation, and site-specific environmental factors. Pursuant to state law, accessory dwelling units (ADUs) are permitted with ministerial building permits unless they are in the Coastal Zone, in which case a planning entitlement is required.

Multi-family housing uses - New apartment building(s) or mobile home parks usually require discretionary planning approvals before building permits are issued. State laws such as the housing accountability act, urban lot splits (SB 9), and employer sponsored housing, have made certain types of development ministerial and eliminated the local discretionary planning entitlement process.

Subdivisions - Subdivisions are subject to the subdivision map act and the County's local subdivision ordinances which require discretionary approval of a tentative map followed by ministerial consideration of a final map if the tentative map is approved. Lots cannot be sold separately until a final parcel map is accepted, even if a tentative map is approved. There are some exceptions (similar to those described above) in state law that remove the local discretion and allow for ministerial approval of a final map. Subdivisions, for the purposes of this discussion, can include creation of lots or can include lots and development. Many subdivisions simply create lots which are sold as vacant lots and buyers of those lots then apply for individual permits to develop. In some cases, a developer may build units on lots, like in the case of East Garrison or Rogge Commons, and sell the unit with the lot. In both cases, the actual creation of a unit can take years from the tentative map approval.

Planning Entitlements v Building Permits - Discretionary Planning Entitlements are often the first step in the process of building new housing units, establishing new uses, or creating new lots. The planning entitlement process provides an opportunity to consider if a proposed development is appropriate based on many different factors. This process can influence the size, shape, design, number of lots or units, and other aspects. It is also a process established to provide an opportunity for public input in the open and public decision-making process. If a planning entitlement is approved, it does not always directly result in a new house, unit, or lot being created. Often conditions of the planning approval must be satisfied and ministerial actions (like securing a building permit or filing a final map) may follow. Building Permits are ministerial approvals that permit the construction of structures and utilities according to approved plans and specifications. Building Permits are determined to meet the California Building Code (with local amendments as applicable) or not, a ministerial decision. Once a building permit is issued, construction may commence. A unit is finally ready for occupancy once a certificate of occupancy or final building inspection is completed.

Affordable Housing - Terms like "an affordable housing project," "Inclusionary Housing Units", "deed restricted affordable units (for sale or for rent), and "employer sponsored housing," have different meanings in state law and in the County Code. Affordable housing projects are usually proposed by a non-profit housing developer or government agency and include the creation of lots and/or units that are intended to be sold or rented to very low-, low-, or moderate-income households. These developments are often financed by state or federal grant programs, tax increments, and local housing fund set asides. Inclusionary Housing usually refers to Chapter 18.40 of the Monterey County code which requires development of 5 or more lots or units provide for at least 20 % of the units for very low-, low-, or moderate-income households. Note: The General Plan requires updating the Inclusionary Housing Ordinance to add 5% of the units be provided to families that qualify as "workforce I" (or above moderate but less than market rate units), in addition to the 20% already required. To satisfy the Inclusionary Housing Ordinance requirements, a developer may provide units for sale or for rent on-site, off-site in certain cases, or pay a fee in lieu of building units. "Employer sponsored housing" is a housing development constructed or purchased by a business that is intended to be occupied by employees of the business. This includes "Agricultural employee housing."

Due to the various types of development, the difference in potential units or lots and actual units or lots depending on the stage in the permitting process, the type of affordable housing, and other relevant factors, staff have attempted to distinguish the data reported below using terminology that reflects the summary above.

During the 2023 calendar year, the County handed out four applications for a subdivision or multifamily project proposing to construct 419 new housing units. Three projects proposed construction of 242 units of employer sponsored housing units. The fourth project is an “affordable housing project” proposing to construct 132 affordable units on County owned property located at 855 E. Laurel Dr., Salinas. In addition to handing out applications for new projects, several projects that began the application process in prior years have restarted work to complete their applications. These projects include: Charolais Ranch, LaTourette, Riverview, and Harper Canyon.

Prepared by: Darby Marshall, HCD Housing Program Manager, (831) 755-5391
Approved by: Craig Spencer, Acting HCD Director

The following attachment is on file with HCD:
Exhibit A - Housing Pipeline

County of Monterey Planning Commission

Item No.6

Board of Supervisors
Chambers
168 W. Alisal St., 1st Floor
Salinas, CA 93901

March 13, 2024

Agenda Item No. 6

Legistar File Number: PC 24-025

Introduced: 3/7/2024
Version: 1

Current Status: Agenda Ready
Matter Type: Planning Item

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Prepared by: Darby Marshall, HCD Housing Program Manager, (831) 755-5391
Approved by: Craig Spencer, Acting HCD Director

The following attachment is on file with HCD:
Exhibit A - Housing Pipeline

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Exhibit A

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MONTEREY COUNTY
HOUSING AND COMMUNITY DEVELOPMENT

HOUSING, PLANNING, BUILDING, ENGINEERING, ENVIRONMENTAL SERVICES

1441 Schilling Place, South 2nd Floor
Salinas, California 93901-4527

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Pipeline Activity During 5th Cycle RHNA:
The following tables summarize the status of all planning applications distributed during the 5th Housing Element Cycle, 2015-2023.

Table 1
Planning Applications Handed Out by Year & Proposed Affordability

	Number of Applications	Very Low-Income	Low-Income	Moderate-Income	Workforce Income	Above Moderate	Employer Sponsored Units
2015	4	58	58	159	78	30	58
2016	2	0	0	52	0	0	0
2017	4	11	11	87	15	11	154
2018	3	2	2	753	5	2	41
2019	4	0	0	190	0	1	5
2020	2	1	1	31	2	1	4
2021	6	5	5	146	11	6	91
2022	4	18	18	19	26	16	241
2023	4	63	63	258	4	4	45
Total	**33**	**158**	**158**	**1,695**	**141**	**70**	**639**

Table 2
Planning Applications by Status & Affordability

5th HE Cycle Applications Only	Number of Applications	Very Low-Income	Low-Income	Moderate-Income	Workforce Income	Above Moderate
Active - Condition Compliance	7	4	50	7	5	79
Active – Construction	6	84	204	85	140	1,672
Active - Planning Review	11	138	352	109	47	322
Construction Complete	4	0	344	0	0	0
Inactive - Condition Compliance	2	0	40	1	1	5
Inactive - Denied/Replaced/Void/Withdrawn	8	16	849	24	18	234
	38	**242**	**1,839**	**226**	**210**	**2,311**

Table 3, includes 11 projects that were entitled prior to the 5th Housing Element Cycle, summarizes projects that are actively working with Planning to submit complete applications or to clear conditions of approval, are fully entitled. The entitled projects have 319 affordable and 2,073 above moderate-income units to construct. The largest single project is East Garrison, which has 99 affordable and 209 market rate units remaining. The oldest approved project with units remaining to construct is Monterra Ranch, approved in 1992.

Table 3
Planning Applications by Status & Affordability W/ Units to Construct

All Applications	Number of Applications	Very Low-Income	Low-Income	Moderate-Income	Workforce Income	Above Moderate
Active - Condition Compliance	14	4	51	104	38	593
Active - Construction	6	41	86	33	76	227
Active - Planning Review	13	139	353	110	49	362
Total Units Approved or Planned	**33**	**184**	**490**	**247**	**163**	**1,182**

The construction of Employer Sponsored Housing has been an important part of the County's ability to provide affordable housing. Table 4 summarizes the status of Employer Sponsored Housing applications distributed during the 5th Housing Element Cycle.

Table 4
Employer Sponsored Housing Applications

5th HE Cycle Only	Number of Applications	Number of Units
Active - Condition Compliance	2	48
Active - Construction	1	60
Active - Planning Review	4	261
Construction Complete	4	344
Inactive - Condition Compliance	1	40
Inactive - Denied / Replaced / Void / Withdrawn	3	830
Total	**15**	**1,583**

6th Cycle RHNA

As shown in Table 5, the current housing pipeline accounts for approximately 42% of the RHNA affordable units and enough above moderate-income units to satisfy the County's RHNA obligations. As noted above, employer sponsored housing units disproportionately account for the number of affordable units entitled or planned.

Table 5
6th Cycle RHNA Impacts

	Very Low-Income	Low-Income	Moderate-Income	Above Market
Allocation	1,070	700	420	1,136
Active - Condition Compliance	4	51	104	631
Active - Construction	41	86	33	303
Active - Planning Review	139	353	110	411
Potential Units	**184**	**490**	**247**	**1,345**
6th Cycle RHNA Remaining	886	210	173	-209

Application Status

Planning applications have been grouped based on the status of the project.

Active – Condition Compliance This includes planning application that have been approved subject to meeting one or more conditions of compliance and the applicant is actively working to clear these conditions. This classification also includes projects that have conditions of compliance that continue after the entitlements have vested and construction started.

Active – Construction This includes planning applications that have been approved and all conditions of approval have been satisfied. The applicant may begin building units.

Active – Planning Review This includes planning applications that have been handed out and staff is processing the application. Applications may be incomplete, complete, or complete and waiting for hearing.

Construction Complete This includes all planning application that was approved and has built all the entitled units.

Inactive – Condition Compliance This includes any planning application that was approved but that staff is unaware of any activity indicating the applicant is actively working to clear conditions of approval. Projects subject to litigation, additional study, or with resource constraints that must be addressed are also included in this category.

Inactive – Denied/Void/Withdrawn This is a catch all category for applications that were started but voluntarily withdrawn by the applicant, denied by a hearing body, or replaced by a subsequent planning application.

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