

ATTACHMENT F
Negative Declaration and Initial Study

South County Housing Corporation
(Camphora Apartments)
PLN100446

County of Monterey
 State of California
NEGATIVE DECLARATION

FILED
 JUN 22 2012
 STEPHEN L. VAGNINI
 MONTEREY COUNTY CLERK
 DEPUTY

Project Title:	The Camphora Apartment Replacement Project
File Number:	PLN100446
Owner:	South County Housing Corporation
Project Location:	32101 McCoy Road, Soledad
Primary APN:	257-031-005-000
Project Planner:	Taven M. Kinison Brown
Permit Type:	A Rezone and Use Permit
Project Description:	A rezoning request to add an Affordable Housing Overlay (AHO) district to the existing Farmland Zoning designation on the subject parcel; a Use Permit to allow for the demolition of 44 substandard farm worker housing units; the construction of 44 new farm worker housing units; and connection to the City of Soledad sewer infrastructure.

THIS PROPOSED PROJECT WILL NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AS IT HAS BEEN FOUND:

- a) That said project will not have the potential to significantly degrade the quality of the environment.
- b) That said project will have no significant impact on long-term environmental goals.
- c) That said project will have no significant cumulative effect upon the environment.
- d) That said project will not cause substantial adverse effects on human beings, either directly or indirectly.

Decision Making Body:	Monterey County Board of Supervisors
Responsible Agency:	County of Monterey
Review Period Begins:	June 25, 2012
Review Period Ends:	July 24, 2012

Further information, including a copy of the application and Initial Study are available at the Monterey County Planning & Building Inspection Department, 168 West Alisal St, 2nd Floor, Salinas, CA 93901 (831) 755-5025.



MONTEREY COUNTY

RESOURCE MANAGEMENT AGENCY – PLANNING DEPARTMENT
168 WEST ALISAL, 2ND FLOOR, SALINAS, CA 93901
(831) 755-5025 FAX: (831) 757-9516



NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION MONTEREY COUNTY BOARD OF SUPERVISORS

NOTICE IS HEREBY GIVEN that the Monterey County Resource Management Agency – Planning Department has prepared a draft Negative Declaration, pursuant to the requirements of CEQA, for a Rezone and Use Permit (The Camphora Apartment Replacement Project, File Number PLN100446) at 32101 McCoy Road, Soledad (APN 257-031-005-000) (see description below).

The Negative Declaration and Initial Study, as well as referenced documents, are available for review at the Monterey County Resource Management Agency – Planning Department, 168 West Alisal, 2nd Floor, Salinas, California. The Negative Declaration and Initial Study are also available for review in an electronic format by following the instructions at the following link:

<http://www.co.monterey.ca.us/planning/docs/environmental/circulating.htm>.

The Planning Commission will consider this proposal at a meeting on Wednesday July 25, 2012 at 9:00 am in the Monterey County Board of Supervisors Chambers, 168 West Alisal, 2nd Floor, Salinas, California. The Planning Commission will be making a recommendation to the Board of Supervisors who will take final action on the project, tentatively scheduled for July 31, 2012. Written comments on this Negative Declaration will be accepted from June 25, 2012 to July 24, 2012. Comments can also be made during the public hearing.

Project Description: The Camphora Apartment Replacement proposal consists of the following entitlements:

- 1) A rezoning request to add an Affordable Housing Overlay (AHO) district to the existing Farmland Zoning designation on the subject parcel; and
- 2) A Use Permit to allow for the demolition of 44 substandard farm worker housing units; and the construction of 44 new farm worker housing units consisting of:
 - a. 22 two-bedroom (880 square foot) and 22 three-bedroom (1,138 square foot) garden apartments;
 - b. A 4,300 square foot community building with a meeting room, office, storage, laundry room and computer lab;
 - c. A half court basketball area, two turf covered play areas, a tot lot, barbecue patio and seating area, and extensive landscaping;
 - d. Solar panels placed on the covered parking areas;
 - e. Grading of approximately 5,000 cubic yards of cut and 4,500 cubic yards of fill;
 - f. And connection to the City of Soledad sewer infrastructure.

We welcome your comments during the 30-day public review period. You may submit your comments in hard copy to the name and address above. The Department also accepts comments via e-mail or facsimile but requests that you follow these instructions to ensure that the Department 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 Department to ensure the Department 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 document 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 Department to confirm that the entire document was received.

For reviewing agencies: The Resource Management Agency – Planning Department requests that you review the enclosed materials and provide any appropriate comments related to your agency's area of responsibility. The space below may be used to indicate that your agency has no comments or to state brief comments. In compliance with Section 15097 of the CEQA Guidelines, please provide a draft mitigation monitoring or reporting program for mitigation measures proposed by your agency. This program should include specific performance objectives for mitigation measures identified (CEQA Section 21081.6(c)). Also inform this Department if a fee needs to be collected in order to fund the mitigation monitoring or reporting by your agency and how that language should be incorporated into the mitigation measure.

All written comments on the Initial Study should be addressed to:

County of Monterey
Resource Management Agency – Planning Department
Attn: Mike Novo, Director of Planning
168 West Alisal, 2nd Floor
Salinas, CA 93901

Re: The Camphora Apartment Replacement Project; File Number PLN100446

From: Agency Name: _____
Contact Person: _____
Phone Number: _____

- _____ No Comments provided
- _____ Comments noted below
- _____ Comments provided in separate letter

COMMENTS: _____

DISTRIBUTION

1. State Clearinghouse (15 CD copies + 1 hard copy of the Executive Summary) – include the Notice of Completion

2. County Clerk's Office
3. CalTrans District 5 – San Luis Obispo office
4. Association of Monterey Bay Area Governments
5. Monterey Bay Unified Air Pollution Control District
6. City of Soledad
7. Mission Soledad Rural Fire, C/O CSG Consultants
8. Monterey County Agricultural Commissioner
9. Monterey County Water Resources Agency
10. Monterey County Public Works Department
11. Monterey County Parks Department
12. Monterey County Environmental Health Bureau
13. Monterey County Sheriff's Office, Attn: David Crozier
14. LAFCO, Attn: Thom McCue
15. Seth Capron, South County Housing Corporation, 7455 Carmel Street, Gilroy CA 95020
16. Mat Huerta, South County Housing Corporation, 7455 Carmel Street, Gilroy CA 95020
17. The Open Monterey Project
18. LandWatch
19. Property Owners within 300 feet (Notice of Intent only)

MONTEREY COUNTY

RESOURCE MANAGEMENT AGENCY

PLANNING DEPARTMENT

168 WEST ALISAL ST., 2nd FLOOR, SALINAS, CA 93901

PHONE: (831) 755-5025 FAX: (831) 757-9516



INITIAL STUDY

I. BACKGROUND INFORMATION

Project Title: The Camphora Apartment Replacement Project

File No.: PLN100446

Project Location: 32101 McCoy Road, Soledad

Name of Property Owner: South County Housing Corporation

Name of Applicant: Seth Capron, South County Housing Corporation

Assessor's Parcel Number(s): 257-031-005-000

Acreage of Property: 4.6 Acres

General Plan Designation: Farmlands 40AC Minimum Parcel Size

Zoning District: F/40

Area Plan: Central Salinas Valley Area Plan

Lead Agency: Resource Management Agency – Planning Department

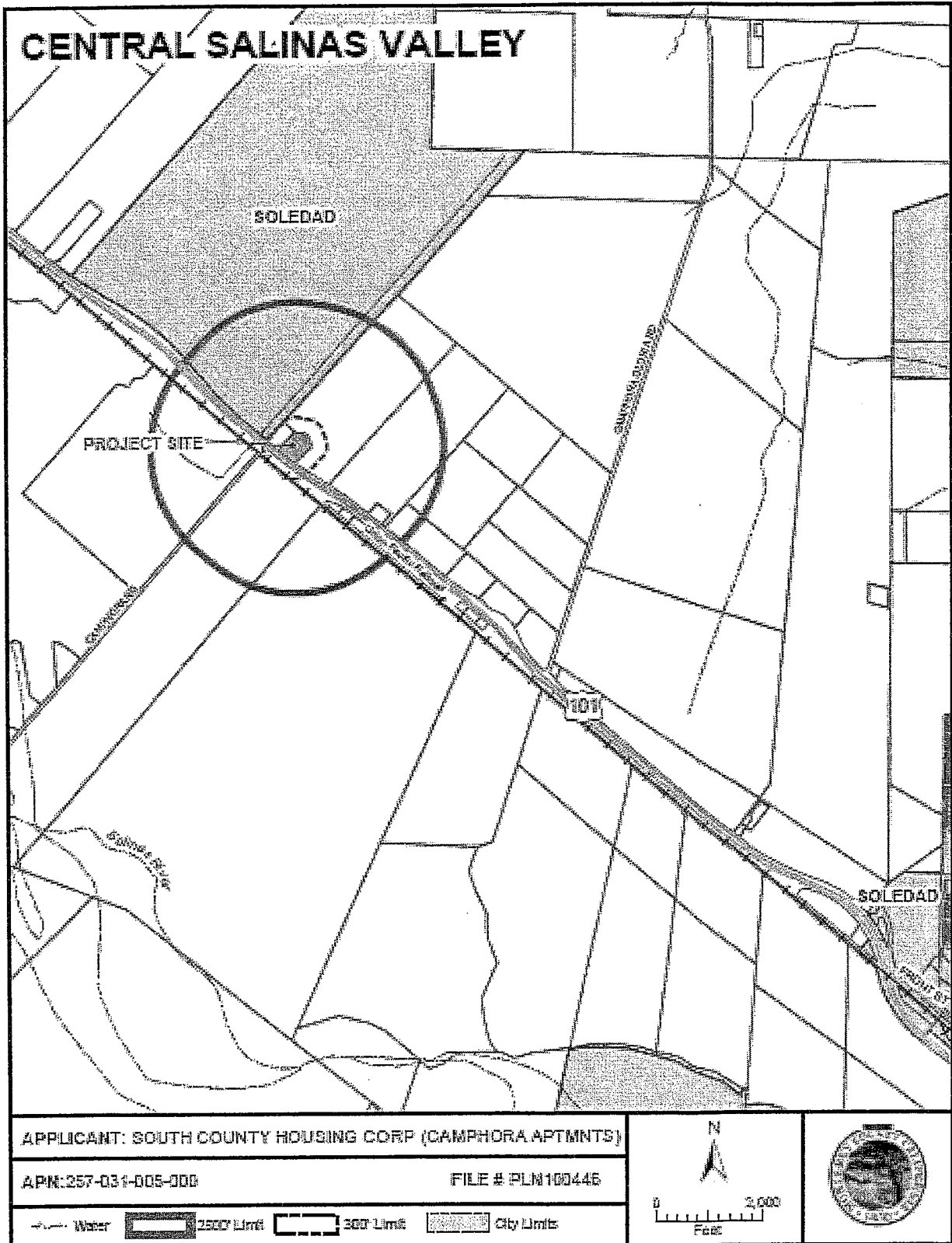
Prepared By: Taven M. Kinison Brown

Date Prepared: June 22, 2012

Contact Person: Taven M. Kinison Brown

Phone Number: 831-755-5173

Location and Vicinity Map

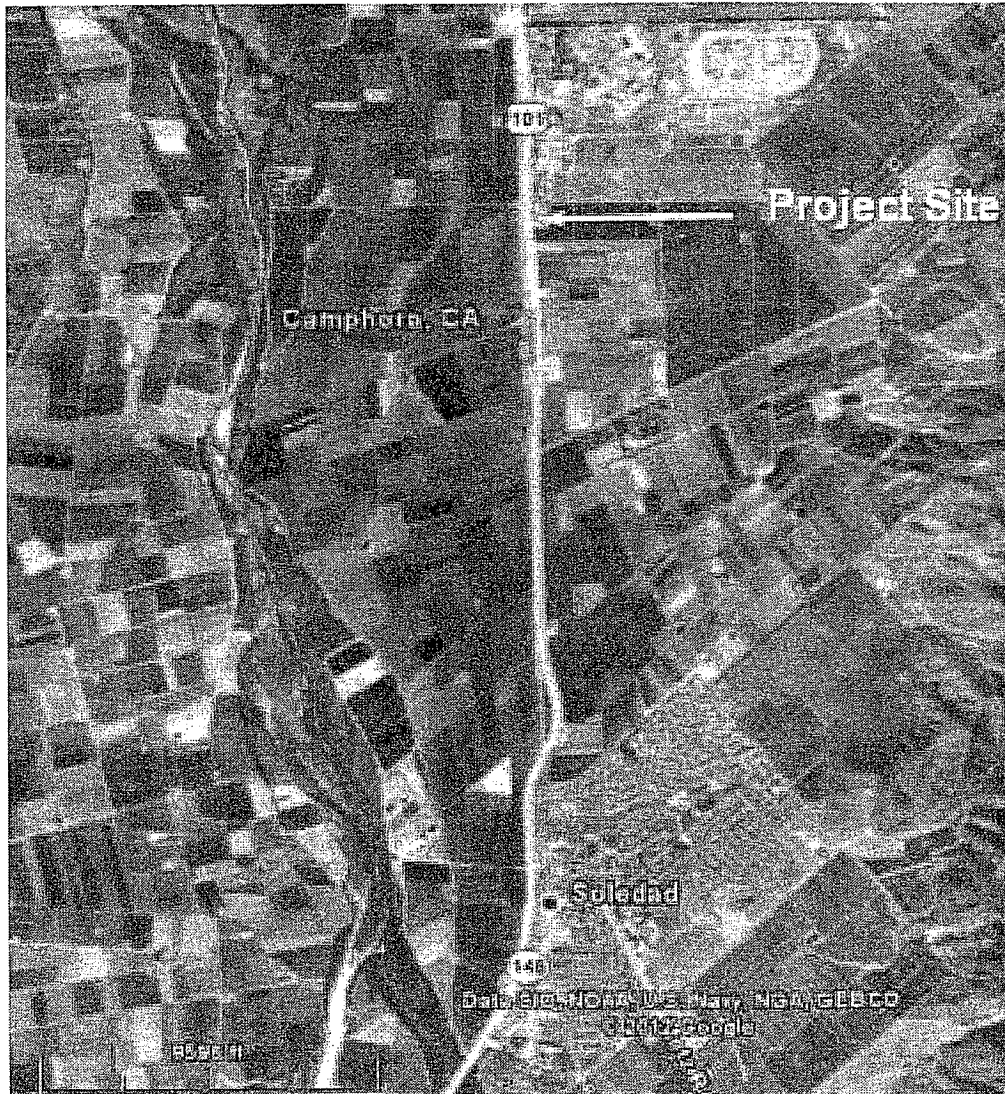


II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING

A. Description of Project:

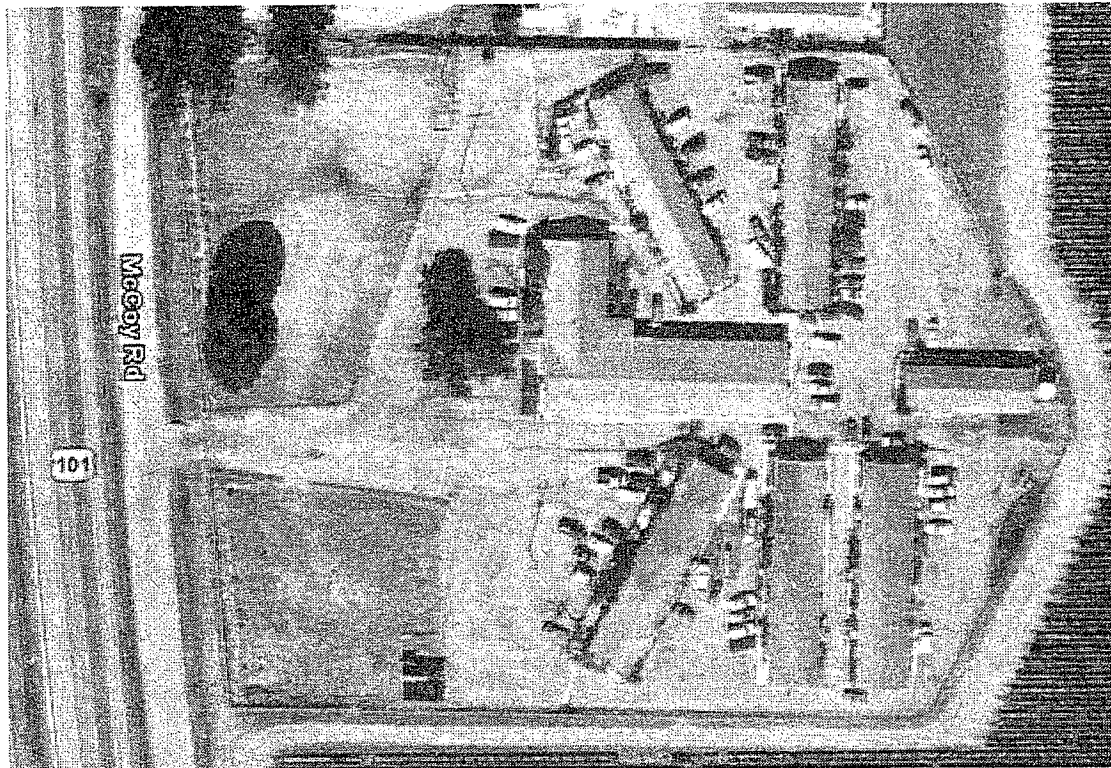
History and Existing Structures

The project is the reconstruction of a Soledad area farm labor housing project approved in September of 1958 for as many as 1,000 men on a parcel less than 5 acres in area, known then as Villa Casa Apartments or Villa Camphora (Use Permit #3352). The site is also referred to as the Camphora Labor Camp. This new project will be referred to as the Camphora Apartment Replacement Project.

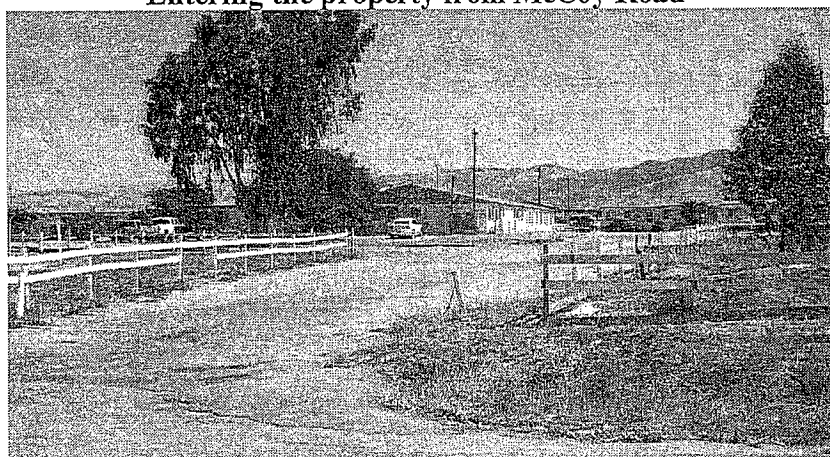


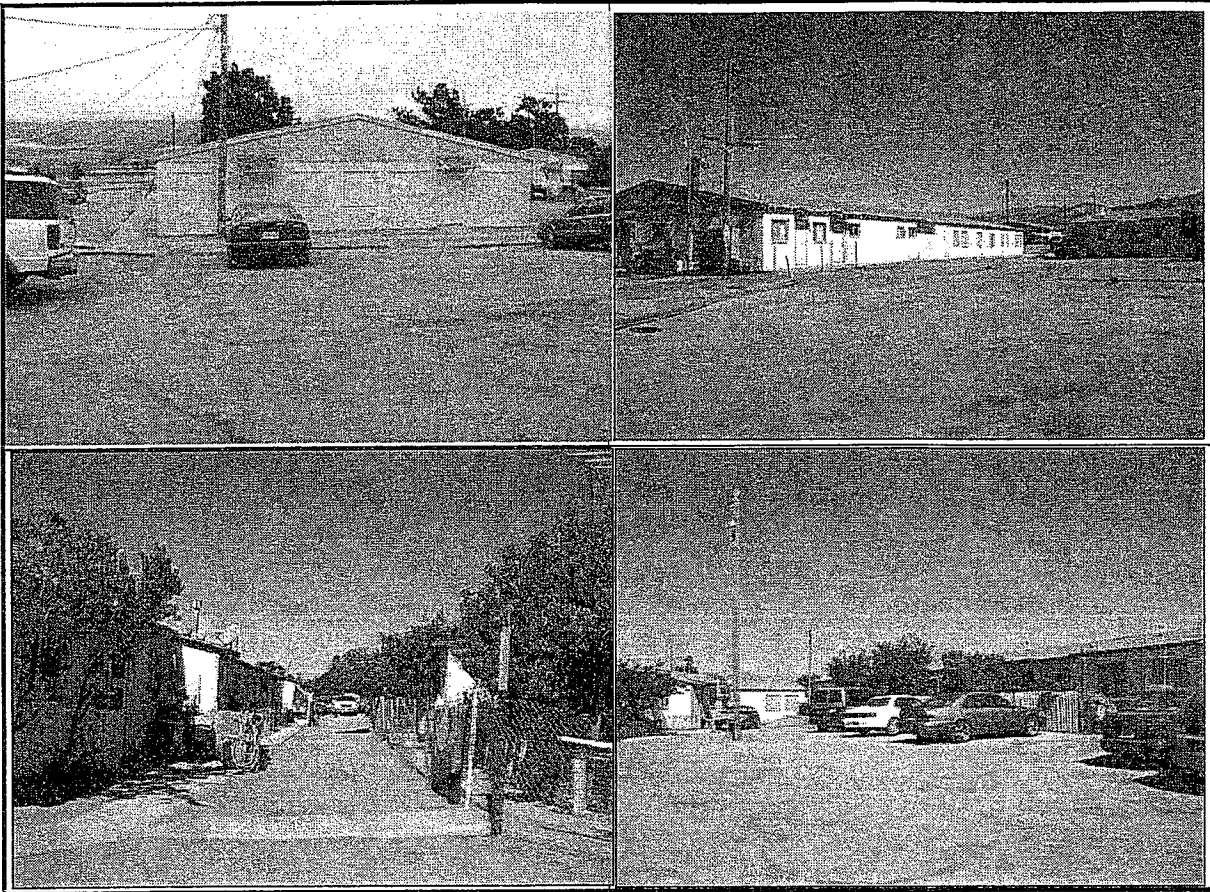
Forty-four units were constructed on the site in the 1960s consisting of seven buildings ranging from 8-10 units per building and all still remain without any notable modifications for 50 years. There are 42 two-bedroom/1 bath units, 1 three bedroom /1 bath unit and 1 one-bedroom/1 bath unit. All units have small kitchens but no living/family room areas and are constructed of cinder

block walls with pitched composition shingle roofs. The northeastern half of the subject site maintains the seven single-story rural residential structures while the southwestern third of the site, fronting McCoy Road, is comprised of hard-packed soils with several groups of eucalyptus trees, extensive pavement and dry-grassy areas above leach field lines. The northeastern edge of the property includes a water well, water tank, and a group of pressure tanks. There are no formal parking spaces or driveways, playgrounds or other common-area recreational facilities. There is a community room and laundry facility, yet there are no windows and only one door on that structure. Topographically, the site is sloped gently toward the southwest. Low earth berms and relatively shallow drainage ditches are present parallel to McCoy Road.



Entering the property from McCoy Road





Correspondence from the California Division of Housing in 1963 and later the Department of Housing and Community Development in 1966 confirmed a maximum legal occupancy of 500 employees/residents would be allowed. County records confirm the applicant's (Valentine Reyes) desire to, "build for 500 men and messing facilities for 1000 men at a later date."

Correspondence in January 1989 from a property representative to the County Health Department determined that approximately 168 residents lived at Villa Camphora. Since this time and up to the present, additional residents have crowded into the aging 44 units, and as of August 2010 there were 185 residents of which 66 were under the age of 18.

Need

As a measure of housing density, a standard of 2 persons per bedroom and 2 persons per common area was used by South County Housing in 2010 to determine the degree of overcrowding. Under this method, thirteen households were considered overcrowded. The present proposal is intended to alleviate overcrowded conditions for the residents, alleviate specific environmental concerns (see following sections) and to bring the property up to current health, safety and building codes. Of particular concern, septic systems on this less than 5-acre parcel have continually failed and have needed service over the decades. Current Health

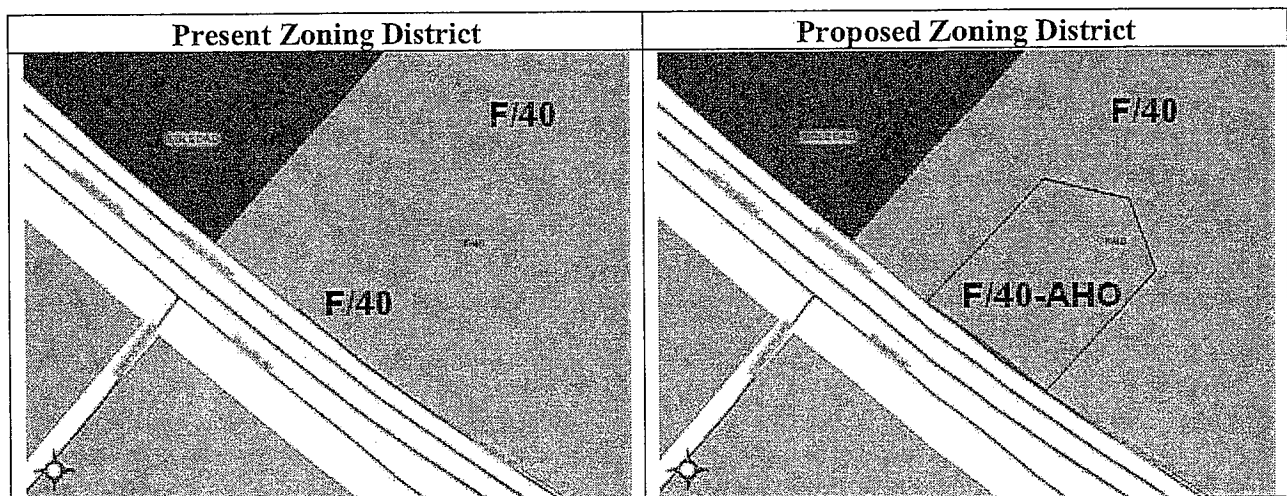
Department standards provide that a land area less than 5 acres in area would only have the potential for 4 septic systems to serve 4 single family residences – much less a population of 185 persons.

Present Proposal.

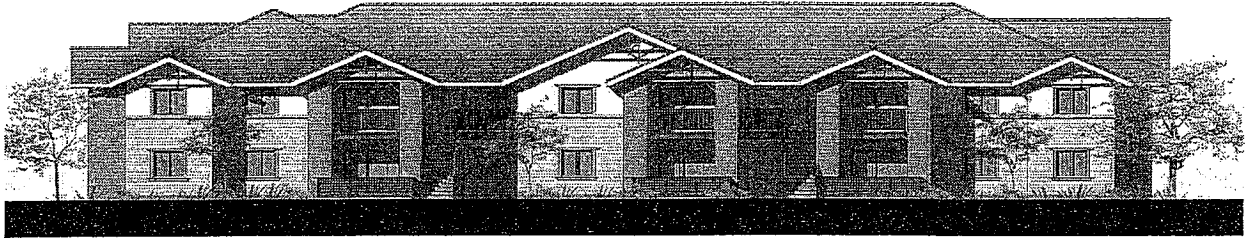
To bring the property into compliance with the 2010 General Plan, the applicants are requesting to add an Affordable Housing Overlay zoning designation to the property, and to redevelop the existing number of units to serve the existing population in the spirit of the new General Plan. As the subject property is zoned F/40, the present concentration of residential uses and structural development on a Farmland zoned parcel is considered non-conforming.

The Camphora Apartment Replacement proposal consists of the following County of Monterey entitlements:

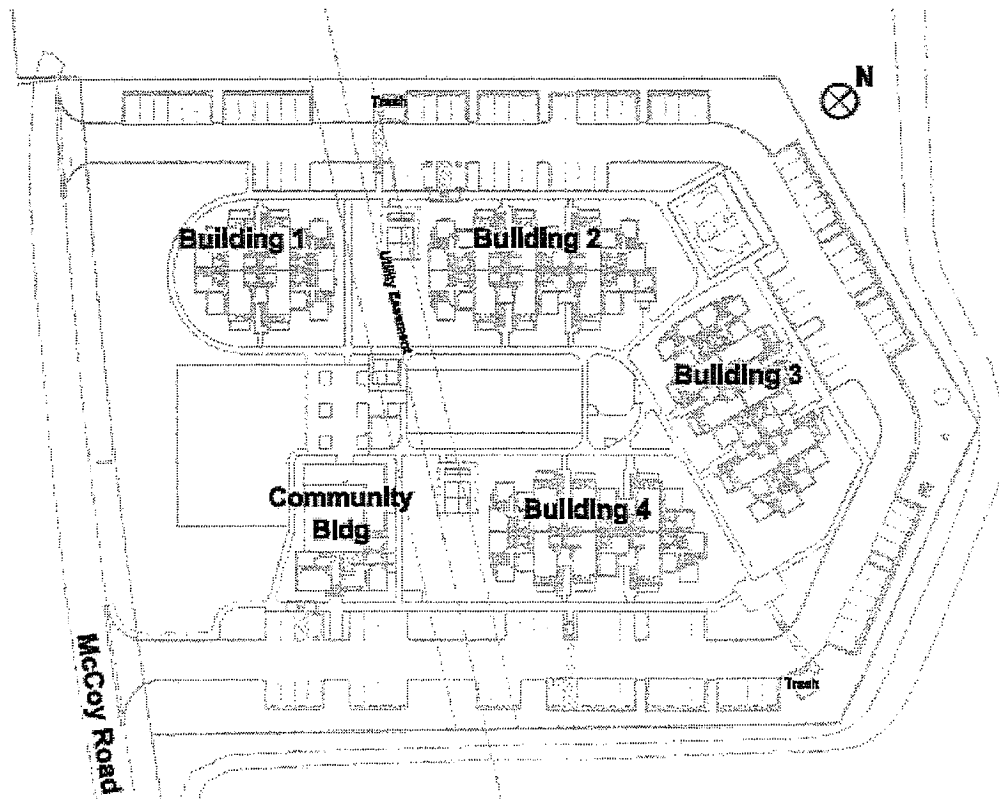
- 1) A rezoning request to add an Affordable Housing Overlay (AHO) district to the existing Farmland Zoning designation on the subject parcel; and
- 2) A Use Permit to allow for the demolition of 44 substandard farm worker housing units; and the construction of 44 new farm worker housing units consisting of:
 - a. 22 two-bedroom (880 square foot) and 22 three-bedroom (1,138 square foot) garden apartments;
 - b. A 4,300 square foot community building with a meeting room, office, storage, laundry room and computer lab;
 - c. A half court basketball area, two turf covered play areas, a tot lot, barbecue patio and seating area, and extensive landscaping;
 - d. Solar panels placed on the covered parking areas;
 - e. Grading of approximately 5,000 cubic yards of cut and 4,500 cubic yards of fill; and
 - f. Connection to the City of Soledad sewer infrastructure.



Representative Elevation of the Camphora Apartment Replacement



Drawing from the applicant's project description, the South County Development Corporation proposes to demolish all the existing improvements on the property except the existing water well. The housing units and community room will be replaced on a one-for-one basis with 44 new garden apartment units. The new complex will consist of 22 two-bedroom 880 square foot units and 22 three-bedroom 1,138 square foot units. They will be built in four clusters in a two-story walk-up configuration. A 4,300 square foot community center will be constructed and will house a large multipurpose room, manager's office, computer lab, kitchen, two baths and laundry room. See attached plans and elevations.



Circulation and Parking

The entire site will be improved with formal on-site circulation and parking, recreation facilities and extensive landscaping. A loop driveway will provide access to all of the units. A total of 121 parking spaces will be provided including 65 covered spaces for residents plus another 23 open

uncovered spaces for resident use. Eighteen additional guest spaces and 15 spaces to serve the community building will also be built. Buses and transit will be able to safely navigate the site to supplement transportation to area work sites.

Recreation and Landscaping

Recreational facilities will be provided for residents to use including a basketball half-court, two turf covered play areas, a tot lot, and a picnic and barbecue area adjacent to the community building. The property will be extensively landscaped. A landscaped earthen berm will be constructed along the McCoy Road frontage of the site to provide for visual separation and noise attenuation from nearby Highway 101.

100% Affordable Housing

Residents now living at the Camphora site are low to very low income families with approximately 66% in occupations classified by the County Economic Development Department as Agricultural Workers (formerly the Housing and Redevelopment Agency). The proposed project will qualify as 100% affordable under County standards. Current residents will be provided temporary housing and relocation during the reconstruction of the site. Extensive rules attached to grant funding sources are in place to assure the least amount of displacement and the right to return for existing residents.

Sewer System Improvements

The on-site septic system will be abandoned and a sewer force main will be installed to connect the Camphora Apartment complex to the City of Soledad sewer system. An existing sewer from the Soledad Prison complex north of the property runs southward along the west side of Highway 101 and then connects to the City of Soledad system. The project will install a connection to that sewer line by tunneling under McCoy Road and Highway 101. Upon approval of the rezoning and development proposal by the County of Monterey, it will be necessary for the project proponents to approach the Local Agency Formation Commission of Monterey County (LAFCO) to seek an "extra-territorial provision of services" to formalize the sewer service being provided by the City of Soledad. A can-and-will serve letter has been issued by the City.

Water Supply and Quality

The existing well on the property will continue to serve the residents. The well was drilled in 1996 to a depth of 690 feet, yields an estimated 500 gallons per minute and meets current drinking water standards. Additional water storage will be incorporated into the project to assure fire flow requirements are met.

Green Building

The new complex will meet "green" building performance standards with the goal of achieving net zero energy use by off-setting projected energy consumption with a large photovoltaic system (solar panels) mounted on the roofs of carports. Upon completion, the construction of the Camphora Apartment complex is intended to meet a LEED Gold level or higher.

B. Surrounding Land Uses and Environmental Setting:

As described above, the site is a 4.6-acre parcel occupied by an aged farmworker housing facility with numerous safety and public health concerns. The site is about halfway between the communities of Soledad and Gonzales in Monterey County and is bound to the southwest by McCoy Road, Highway 101 and the Union Pacific Railroad (UPRR) tracks. Adjacent developed properties to the north include the Hacienda Labor Camp and the Salinas Valley State Prison / Soledad Correctional Facility. Other surrounding lands are cultivated with vineyards.



Regional Features

The project is in the central portion of the Salinas Valley, a major agricultural area. Unique and sensitive areas in the Salinas Valley area include the Pinnacles National Monument and habitat areas for the endangered California condor, among other rare species. These features are located in the non-agricultural Gabilan Range to the east of the Salinas Valley and will be unaffected by the project. The Salinas Valley is seismically active and the project site is approximately 4.35 miles northeast of the Rinconada Fault and approximately 14 miles southwest of the San Andreas Fault (creeping segment). Strong ground shaking should be expected during the design life of the planned development.

Local Features and Environmental Setting / Issues

Noise U.S. 101 and the Union Pacific Railroad (UPRR) are located to the southwest of the site and provide a significant source of noise. Special building construction and site development

considerations have been identified as necessary to attenuate elevated noise levels for some of the closer units to these noise generators.

Roads and Access McCoy Road serves the project site and other industrial/commercial uses and is a two-lane roadway that runs in a north-south direction and extends north from its intersection with the US 101 northbound onramp to its termination point approximately 250 feet north of the existing project site entrance. The pavement of McCoy Road was measured to be 23 feet wide with centerline striping and no shoulders. The pavement width on McCoy Road narrows to generally 20 feet wide at the project entrance with no centerline striping. Sight distance along McCoy Road is adequate since its horizontal alignment is generally straight with very little vegetation. While no increase in the Camphora population or traffic trips are expected with project approval, and hence no mitigation measures addressing capacity improvements are deemed necessary for the project, safety measures, such as increased signage and refreshed pavement striping and markings have been identified. Some additional paving has also been identified to supplement the existing too-narrow 20 foot roadway width of the McCoy Road frontage along the project site to meet minimum County Standards.

Agriculture and Soils The site (prior to the 1960s) and the surrounding areas have been in constant agricultural production for many decades. The organochlorine pesticides DDE, DDT and dieldrin have been detected on the site and several extensive testing regimes and correspondence with the State Department of Toxic Substance Control (DTSC) have occurred. Additionally, there are naturally occurring arsenic levels at the site that exceed present Regional Water Quality Control Board (RWQCB) Environmental Screening Levels. The DTSC has issued a No Further Action Letter based on the soils testing provided by the applicant. These will be further discussed in Section VI.

Septic Systems As introduced above, septic systems on this less than 5-acre parcel have continually failed and have needed constant service over the decades. To alleviate the public health concern of ground water and surface contamination and to serve such an apartment facility it is appropriate to connect to a public sewer.

Overcrowding The existing 44 residential units in six buildings and the one community structure on the property cover approximately 29,586 square feet according to plans submitted by the applicant. Presently these 44 units house approximately 185 persons and at least 13 of these units are overcrowded. Approval of the South County Housing proposal would result in providing nearly 45,000 square feet of living space for the same 44 "households," adding 22 three-bedroom units where no three-bedroom units previously existed. The project also includes a 4,301 square foot common use community center.

Historic Resources While these onsite structures were constructed in the 1960s, none are considered historic. The project area contains no resources listed in the California Inventory of Historical Resources (March 1976), California Historical Landmarks, and the National Register of Historic Places. Within one mile of the project area, the State Highway 101 alignment to the southwest of the project area has been recorded as a historic resource, as well as a farm complex one mile to the southeast.

C. Other public agencies whose approval is required:

The following agencies are being approached or have already provided funding for predevelopment, soft costs and construction:

	Agency	Type of Approval
•	Monterey County Redevelopment Agency	Awarded some funding in 2010
•	California CDBG through Monterey County [Community Development Block Grant Program]	Grant application submitted by Monterey County in April 2012
•	USDA 514 [United States Department of Agriculture Farm Labor Housing Loans and Grants Program]	Applied for unsuccessfully in August 2010 & August 2011. Will apply again in August 2012
•	California HCD HOME - SCH CHDO [California Department of Housing and Community Development, HOME Investment Partnerships Program, assistance for Community Housing Development Organizations]	Will be apply in June 2012
•	United States Department of Labor - Farmworker Housing Grant	One year award in summer of 2011; one year renewal applied for in May 2012
•	California - Low Income Housing Tax Credits (TCAC)	Will be applied for after all other funding is secured

The following agency approvals are required to implement the project:

•	Local Area Formation Commission (LAFCO) Extra-territorial service connection to Soledad Sewer	Applied for concurrently with Monterey County use permit
•	Monterey County Building Department Grading Permit	Will be applied for when funding is in place
•	Monterey County Building Department Building Permit	Will be applied for when funding is in place
•	Central Coast Regional Water Quality Control Board Storm Water Pollution Prevention Plan	Will be applied for when funding is in place

III. PROJECT CONSISTENCY WITH OTHER APPLICABLE LOCAL AND STATE PLANS AND MANDATED LAWS

Use the list below to indicate plans applicable to the project and verify their consistency or non-consistency with project implementation.

General Plan/Area Plan	<input checked="" type="checkbox"/>	Air Quality Mgmt. Plan	<input checked="" type="checkbox"/>
Specific Plan	<input type="checkbox"/>	Airport Land Use Plans	<input type="checkbox"/>
Water Quality Control Plan	<input checked="" type="checkbox"/>	Local Coastal Program-LUP	<input type="checkbox"/>

General Plan/Area Plan. The Project site is within the Central Salinas Valley Area Plan of the 2010 Monterey County General Plan. There are no relevant provisions of the Central Salinas Valley Area Plan that have a particular bearing on the project. The Area Plan speaks to several Special Treatment Areas and the Spence/Potter/Encinal Road Study Area and does not include the Camphora Apartment Replacement project site. This site is not within a designated sensitive or highly sensitive Scenic Highway Corridor. Additionally, the project site does not encroach on the Arroyo Seco or Salinas Rivers in regard to protecting areas for groundwater recharge, nor is the project a visitor serving commercial use. Consistency with the 2010 Monterey County General Plan is discussed in detail in Section VI; issues of appropriate and efficient Land Use, Affordable/Workforce Housing Programs, Adequate Public Facilities and Services, adjacency to Agricultural uses and maintaining the character and natural beauty of Monterey County.

Water Quality Control Plan. The project site is subject to the Water Quality Control Plan for the Central Coastal Basin (Salinas River Hydrological Unit) administered by the California Regional Water Quality Control Board Central Coast Region. Water quality problems most frequently encountered in the Central Coastal Basin pertain to excessive salinity or hardness of local ground waters. Increasing nitrate concentrations is a growing problem in the Salinas River Basin, Los Osos Creek Basin, the Santa Maria Valley, and near Arroyo Grande. This project includes the conversion of failing septic systems and connection to a municipal sewer system for the purposes of protecting water quality, preventing ground pollution and minimizing potential health hazards and exposures. Consistency of the project with the Water Quality Control Plan for the Central Coast Basin is further discussed in Section VI.

Air Quality Management Plan. The project site is subject to the 2008 Air Quality Management Plan of the Monterey Bay Unified Air Pollution Control District. While the project is meant to serve the same population of residents presently on the property and is not considered growth inducing, demolition and reconstruction activities will occur and will have temporary noise and potential air quality impacts. Consistency of the project with the 2008 Air Quality Management Plan is further discussed in Section VI.

IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

A. FACTORS

The environmental factors checked below would be potentially affected by this project, as discussed within the checklist on the following pages.

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

Some proposed applications that are not exempt from CEQA review may have little or no potential for adverse environmental impact related to most of the topics in the Environmental Checklist; and/or potential impacts may involve only a few limited subject areas. These types of projects are generally minor in scope, located in a non-sensitive environment, and are easily identifiable and without public controversy. For the environmental issue areas where there is no potential for significant environmental impact (and not checked above), the following finding can be made using the project description, environmental setting, or other information as supporting evidence.

Check here if this finding is not applicable

FINDING: For the above referenced topics that are not checked off, there is no potential for significant environmental impact to occur from either construction, operation or maintenance of the proposed project and no further discussion in the Environmental Checklist is necessary.

EVIDENCE:

Mineral Resources - The site has been developed with farmworker housing since the mid 1960s and is not in an area of known mineral resources. No locally important mineral resources are indicated on GIS resource maps for the County of Monterey at the project site. In this manner, there will be no impact to mineral resources. (References 1, 2, 3, 7).

B. DETERMINATION

On the basis of this initial evaluation:

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

Taven M. Kinison Brown
Signature

June 22, 2012
Date

Taven M. Kinison Brown

Project Planner

V. EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).

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

VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Have a substantial adverse effect on a scenic vista? (Source:1, 2, 3, 5, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (Source:1, 2, 3, 5, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Substantially degrade the existing visual character or quality of the site and its surroundings? (Source:1, 2, 3, 5, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Source:1, 2, 3, 5, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

While traveling Highway 101 through Monterey County provides great views of hills, mountains and agricultural uses for most of the valley, the low lying flat areas of the Central Salinas Valley are not considered scenic vistas. Under the General Plan though, the hills and mountains that shape the bowl of the valley are considered sensitive and highly sensitive viewsheds. Highway 101 is not designated in Monterey County as a state scenic highway.

a) – b) Less Than Significant Impact. This particular project area is immediately adjacent to Highway 101 and lies south of an existing penal institutions, another labor camp and the flatter agricultural areas planted in grapes. Removal of aging farm labor housing structures, to be replaced by garden apartments as described above, will not have a adverse effect on a scenic vista, damage scenic resources, protected trees, rock outcroppings, or historic buildings within a state scenic highway. Therefore the project will have a less than significant impact on scenic vistas and scenic resources.

c) – d) Less Than Significant Impact. The redevelopment of the project site will provide an “up-grade” to the existing deteriorating site. The new structures and grounds are designed to be walk-up garden apartments with modern amenities and community areas such as a basketball half-court, turf play area, mini soccer field, tot lot, and a large picnic and barbecue area adjacent to the community building. The property will be extensively landscaped. A landscaped earthen berm will be constructed along the McCoy Road frontage of the site to provide for visual separation and noise attenuation from nearby Highway 101. This is a departure from the institutional style of the present facilities. New lighting fixtures will be provided adjacent to walks and areas that need lighting for safety. Standard conditions of approval by the County require that lighting plans be prepared and that all lighting be unobtrusive. The present quality of nighttime lighting is unknown for the site. Less than a mile to the north of the property is the

Salinas Valley State Prison / Soledad Correctional Facility that has very bright obtrusive lighting. Therefore the project will have a less than significant impact on the existing visual character, nor adversely impact nighttime views in the area.

2. AGRICULTURAL AND FOREST RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (Source: 1,2,3,5,7,19)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? (Source: 1,2,3,4,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (Source: 1,2,3,5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use? (Source: 1,2,3,5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? (Source: 1,2,3,5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

While located in the Central Salinas Valley among agricultural resources and farming areas, the 4.6 acre site has been developed with farmworker housing for 50 years and has not been farmed for that period. County geographic information resources data regarding Prime Farmland, Unique Farmland, or Farmland of Statewide Importance indicate that the site and areas northwest of the property as "Urban and Built-up Land." These areas are developed with worker housing. The northeastern and southeastern areas adjacent to the site are considered Prime Farmland. Properties southwest of the Camphora Apartment site, across McCoy Road, Highway 101, the Union Pacific Railroad tracks and Sillman Road (approximately 300 feet away) are also agricultural areas considered Prime Farmland and are protected under Williamson Act contracts.

a) No Impact. The redevelopment of this existing facility on a 4.6 acre site considered “Urban and Built-up Lands” does not convert farmland to non-agricultural use. Therefore the project will have a less than significant impact on Prime, Unique or Farmlands of Statewide Importance.

b) Less Than Significant Impact. Presently the site is zoned Farmland 40 (F/40) and is not under Williamson Act. While the farmworker housing facility does have a Use Permit dating back to its approval in 1958 and its construction in the 1960s, the development is considered legal, but non-conforming to current development standards. Site Development Standards in the F/40 zone specify a minimum building site of 40 acres and maximum building site coverage of 5%, except for greenhouses which are permitted up to 50% coverage with a Use Permit. The present site is 4.6 acres; much less than 40 acres, and has approximately 15% lot coverage. Under the F/40 zoning designation only, the construction of the project would require an acknowledgment of continued non-conformities, and exceptions to development standards. To remedy this situation, the applicants have requested to establish an Affordable Housing Overlay Zoning designation (AHO) to the property under the allowances of the 2010 General Plan. With a project that meets the criteria of the Affordable/Workforce Housing Program outlined in General Plan Policy LU-2.11, and a new Zoning Designation of F/40–AHO the proposed project would be legal and conforming to the General Plan and Zoning designations. As the AHO is part of the applicant’s proposed project, it is not considered mitigation. Land Use and zoning consistency is discussed more thoroughly in Section VI.10. b) Land Use and Planning. Therefore the project will have a less than significant impact on agricultural uses or Williamson Act contracts.

c) - d) No Impact. The project site is not forested and therefore there will be no impact to such forest land resources.

e) No Impact. The site has been developed with farm labor housing for several decades. As the project is the removal and replacement of the same number of dwelling units and bringing such living units up to modern codes and health and safety standards, this is not seen as an intensification of use, or otherwise growth inducing with primary or secondary environmental impacts that could lead to conversion of Farmland to non-agricultural use. Therefore the project will have a less than significant impact on the conversion of farmlands to non-agricultural uses.

3. 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:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan? (Source: 1,10,20)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? (Source: 1,10,20)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3. 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:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? (Source: 1,10,20)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in significant construction-related air quality impacts? (Source: 1,6,10,13,20)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Expose sensitive receptors to substantial pollutant concentrations? (Source: 1,5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Create objectionable odors affecting a substantial number of people? (Source: 1,5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

The project is the demolition of 44 existing residential units and the reconstruction of the same number of units on the same site. The project will involve the grading of approximately 5,000 cubic yards of cut and 4,500 cubic yards of fill. Following construction activities, no greater impact to air quality is foreseen. Construction practices to minimize dust and particulate matter during construction activities will be employed through the imposition of standard conditions of approval. Residential projects are generally exempt from requiring a permit issued by the Air District. According to the 2008 Air Quality Management Plan, prepared by the Monterey Bay Unified Air Pollution Control District, the criteria for Short-term Construction Impact and Long-term Operations are as follows:

- (1) Short-term Construction will emit less than 82 lb/day of PM₁₀ or: will not cause a violation of PM₁₀ AAQS at existing receptors; and the equipment used is "typical construction equipment."
- (2) Long-term operation of the project will:
 - i. Emit less than 137 lb/day of VOC or NO_x;
 - ii. Directly emit less than 550 lb/day of CO or will not cause a violation of CO Ambient Air Quality Standards (AAQS) at existing or reasonably foreseeable receptors;
 - iii. Not significantly impact traffic levels of service or will not cause a violation of CO AAQS at existing or reasonably foreseeable receptors;
 - iv. Directly emit less than 82 lb/day of PM₁₀ on-site or will not cause a violation of PM₁₀ AAQS or contribute 82 lb/day to an existing or projected violation at existing or reasonably foreseeable receptors;

- v. Not directly generate PM₁₀ along unpaved roads or will not cause a violation of PM₁₀ AAQS or contribute 82 lb/day to an existing or projected violation at existing or reasonably foreseeable receptors; and
- vi. Directly emit less than 150 lb/day of SO_x or will not cause a violation of SO₂ AAQS at existing or reasonably foreseeable receptors.

a) - c) Less than Significant Impact: The North Central Coast Air Basin is listed by the U.S. EPA and the California Air Resources Board (CARB) as being in attainment for all criteria air pollutants under federal standards, but is in non-attainment under state standards for PM-10 particulates and ozone.

The first criteria is if the project's air pollutant emissions with respect to the Federal and State Standards will not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, delay their timely attainment, or interfere with the interim emission reductions specified in the Plan. Based on the air quality report for this project which was based on the California Emissions Estimator Model (CalEEMod) (May 2012) (REF #20), the air pollution emissions do not exceed the Federal or State Ambient Air Quality Standards. Results from the CalEEMod computations prepared by staff for the resultant air quality emissions (non-construction) generated by the project are as follows:

- i) The project is estimated to emit 6.79 lbs/day of NO_x. This is less than the 137 lb/day threshold.
- ii) The project is estimated to directly emit 28.87 lbs/day of CO. This is less than the 550 lb/day threshold.
- iii) The Project will not significantly impact traffic levels of service as it is the replacement of 44 residential units with 44 residential units.
- iv) The operational project is estimated to contribute 3.18 lbs/day of PM₁₀ on-site. This is less than the 82 lb/day of PM₁₀ threshold.
- v) The project will not directly generate PM₁₀ along unpaved roads, as all access points to the apartment complex are via paved roads.
- vi) The project is estimated to release 0.05 lbs /day of SO₂. This is less than the 150 lb/day of SO_x threshold.

Therefore, the project meets the first criteria for compliance with the Plan.

The second criteria is compliance with the control measures in the Plan. The Monterey Bay Unified Air Pollution Control District Air Quality CEQA analysis guidelines state that a multi-family residential project of no more than 1,080 units is normally less than significant. The project is the reconstruction of 44 existing residential units and therefore does not rise to a level of significance under this criteria. The computations as described above and below, verify this. Therefore the project will have a less than significant impact on implementation of the air quality plan, will not violate air quality standards or contribute to projected air quality violations, nor result in a cumulatively considerable net increase in criteria pollutants.

d) Less than Significant Impact - Based on the air quality report for this project which was based on the California Emissions Estimator Model (CalEEMod) (May 2012) (REF 20), the air pollution emissions do not exceed the Federal or State Ambient Air Quality Standards. Results

from the CalEEMod air quality computations prepared by staff for the construction activities for the project are as follows:

- i) Construction activities are estimated to emit 32 lbs/day of NO_x. This is less than the 137 lb/day threshold.
- ii) Construction activities are estimated to directly emit 24.11 lbs/day of CO. This is less than the 550 lb/day threshold.
- iii) Construction activities will not affect Levels of Service as local roads currently operate at a Level of Service A and the addition of construction vehicle traffic, while the apartment residents have been relocated, will actually be less traffic than the operational phase of the project.
- iv) Construction activities are estimated to contribute 3.5 lbs/day of PM₁₀ on-site. This is less than the 82 lb/day of PM₁₀ threshold.
- v) Construction activities will not directly generate PM₁₀ along unpaved roads, as all access points to the apartment complex are via paved roads.
- vi) Construction activities are estimated to release 0.05 lbs /day of SO₂. This is less than the 150 lb/day of SO_x threshold.

Standard dust control measures will be implemented during the construction phase of the project and an asbestos survey will be required by the Monterey Bay Unified Air Pollution Control District prior to demolition of the existing buildings. Any identified asbestos-containing materials will be abated in accordance with current regulations prior to demolition. The project will comply with all of the District's applicable rules and regulations. Therefore, construction activities generated by the project will not result in significant air quality impacts.

e) – f) Less Than Significant Impact. The replacement of existing residential units will not introduce substantial pollutant concentrations, nor introduce objectionable odors, and there are no known sensitive receptors within the vicinity of the project site, aside from the neighboring labor camp. Therefore the project will have a less than significant impact on these criteria air quality criteria.

4. BIOLOGICAL RESOURCES	Less Than Significant			
Would the project:	Potentially Significant Impact	With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Source: 1,5,7,19,23)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (Source: 1,5,7,19,23)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4. BIOLOGICAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
c) 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? (Source: 1,5,7,19,23)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (Source: 1,5,7,19,23)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Source: 1,2,3,4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (Source: 1,5,7,19,23)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) - e) No Impact. The property is a developed residential site that was formerly agricultural (50 years in the past); no significant wildlife habitat or natural features are present and the site does not include protected trees. Surrounding lands are either developed or active farmland. The planned project will not affect a listed endangered or threatened species or adversely affect a proposed critical habitat for an endangered or threatened species, or jeopardize the continued existence of a proposed endangered or threatened species. Therefore, the project will not have an impact on these resources.

f) No Impact. Redevelopment of the project site will not conflict with any applicable habitat conservation plan or natural community conservation plan. In review of the websites of the California Department of Fish and Game (CDFG) and United States Fish and Wildlife Service (USFWS) there are no adopted habitat conservation plan or natural community conservation plan along this portion of the Salinas Valley. There are plans in place to protect Yadon's piperia (*Piperia yadonii*) at Pebble Beach, Yadon's Piperia and Hooker's Manzanita at the Presidio of Monterey and Presidio of Monterey Annex Monterey County, and numerous species at Fort Ord: smith's Blue Butterfly, Western snowy plover, California red-legged frog, sand gila, Monterey spineflower, robust spineflower, black legless lizard and Yadon's Piperia. In this manner there will be no impact to these resources or conflicts with adopted plans at the project site.

5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5? (Source: 1,7,14,19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? (Source: 1,7,14,19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Source:1,7,14,19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries? (Source: 1,14,19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) – d) Less Than Significant Impact. While the onsite structures were constructed in the 1960s, none are considered historic. The project area contains no resources listed in the California Inventory of Historical Resources (March 1976), California Historical Landmarks, and the National Register of Historic Places. Within one mile of the project area, the State Highway 1 alignment to the southwest of the project area has been recorded as a historic resource, and a farm complex one mile to the southeast has been identified. No paleontological resources or unique geologic features have been identified on the site. Therefore, construction of the project would not cause a substantial adverse change in the significance of a historical resource or archaeological resource, or directly or indirectly destroy a unique paleontological resource site or unique geologic feature.

While no human remains are expected to be unearthed, a standard practice for the County of Monterey is to apply a condition of approval alerting the site developer to the proper practices to follow should such an occurrence happen during construction.

- “If archaeological resources or human remains are unexpectedly discovered during any construction, work shall be halted within 50 meters (±160 feet) of the find until it can be evaluated by a qualified professional archaeologist. If the find is determined to be significant, appropriate mitigation measures shall be formulated, with the concurrence of the Lead Agency and implemented.”

6. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Source: 1,2,11) Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking? (Source: 1,2,7,11)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction? (Source: 1,2,7,11)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides? (Source: 1,2,7,11)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil? (Source: 1,15)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (Source: 1,7,11)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Chapter 18A of the 2007 California Building Code, creating substantial risks to life or property? (Source:1,7,11)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (Source:1,6,12,16)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

a.i) No Impact. According to the geotechnical report, the site is located within the seismically active Salinas Valley but is outside Alquist-Priolo Earthquake Fault Zones. The site is approximately 4 miles northeast of the Type B Rinconada Fault, 10 miles southeast of the Monterey Bay-Tularcitos fault and 14 miles southwest of the Type B San Andreas Fault (creeping segment). No Type A faults are mapped within 15 miles of the site. Therefore the project will have a less than significant impact on exposure of people or structures to substantial adverse effects including the risk or loss, injury or death involving rupture of a known earthquake fault.

a.ii) Less Than Significant Impact. Referencing the *Monterey County, California Multi-Jurisdictional Hazard Mitigation Plan, Figure E-6. Earthquake Hazard Areas*, it is probable that the site will experience moderate seismic events. According to the geotechnical report, strong ground shaking should be expected during the design life of the planned development. At a minimum, the planned improvements should be designed to resist seismic shaking in accordance with current California Building Code (CBC) requirements. Seismic design parameters based on the 2010 Edition of the California Building Code are presented in the geotechnical report. Therefore the project will have a less than significant impact on exposure of people or structures to substantial adverse effects including the risk or loss, injury or death involving strong seismic ground shaking.

a.iii) Less Than Significant Impact. Based on the Monterey County Relative Liquefaction Susceptibility Map, the site is in an area having a low liquefaction potential and potentially liquefiable soils were not encountered in borings. No mitigation measures have been determined necessary. Therefore the project will have a less than significant impact on exposure of people or structures to substantial adverse effects including the risk or loss, injury or death involving seismic related ground failure including liquefaction.

a.iv) No Impact. The site is in the flat central areas of the agricultural Salinas Valley, far removed from slopes or potential landslides. Therefore the project will have a less than significant impact on exposure of people or structures to substantial adverse effects including the risk or loss, injury or death involving landslides.

b) No Impact. Approval of the project would not result in soil erosion or substantial loss of top soil in that the site has been disturbed for many decades and any "quality" top soil has been long lost. Standard construction techniques and drainage methods will be employed during construction and in final site development; no increased potential for soil erosion is anticipated. Therefore the project will have a less than significant impact on soil erosion or the loss of topsoil.

c) – d) Less Than Significant Impact. The primary geotechnical concern is the potential for disturbance of the soil during demolition of the existing structures and removal of the septic system. A program of remedial grading is recommended to recompact soils disturbed during demolition and to increase the density of the loose soils within the foundation bearing zone. Such grading and compaction will be done in accordance with current California Building Code (CBC) requirements, and therefore, does not rise to the level of "mitigation" for the purposes of this environmental review. On- or off-site landslide potential, lateral spreading, subsidence, liquefaction or collapse are not concerns for this project. The soils at the boring locations are non-plastic and therefore should have a low expansion potential. Measures other than moistening and compacting the soil are not considered necessary. Therefore the project will have a less than significant impact on unstable soils.

e) Less Than Significant Impact. As introduced in the Project Description, the project site has had problematic and historically failing septic systems. Present Monterey County Code for sizing septic systems would restrict a 4.6 acre project site to serving no more than 4 single-family households. The site presently serves 186+/- persons and the soils, septic system components and leach areas are not serving such a large population well. The on-site septic

system is to be abandoned and a sewer force main will be installed to connect the Camphora Apartment complex to the City of Soledad sewer system. An existing sewer from the Soledad Prison complex north of the property runs southward along the west side of Highway 101 and then connects to the City of Soledad system. The project will install a connection to that sewer line by tunneling under McCoy Road and Highway 101. In this manner, the project proposes to alleviate a chronic issue with the soils of the project site, as septic treatment systems will no longer be used. Therefore the project will have a less than significant impact on soils incapable of adequately supporting the use of septic tanks or alternate alternative wastewater disposal systems.

7. GREENHOUSE GAS EMISSIONS	Less Than Significant			
	Potentially Significant Impact	With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Source: 1,6,10,20)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Source: 1,6,10,20)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) – b) Less than Significant Impact. The project is the replacement of existing residential units. The project’s air quality impacts have been analyzed by staff through the California Emissions Estimator Model (CalEEMod) and data has been presented in the Air Quality Section above. None of the criteria air quality pollutants for the construction and operational phases will be exceeded by implementation of the project (See Section VI.3). The project includes a full complement of new landscaping including the planting of 55+ mixed hardwood and other trees, an attempt to be “off-the grid” for electricity production with the incorporation of photovoltaic solar panels above the carports, and the project proponents intend to construct the project to meet a LEED Gold level or higher. In this manner, the project’s contributions to Greenhouse Gas Emissions are considered less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS	Potentially	Less Than	Less Than	No
	Significant Impact	Significant With Mitigation Incorporated	Significant Impact	Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Source: 1,6,12)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Source: 1,6,12)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Source:1,5,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Source: 1,6,12,21)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? (Source:1,2,5,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? (Source: 1,2,5,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Source:1,2,6,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? (Source:1,2,6,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

Due to the age and history of the existing facilities, there are remnants of past agricultural and building practices that are no longer used and have been long discontinued due to human and environmental health concerns. DDT and other organochlorine pesticides have not been used in decades for agricultural applications, and lead paint and asbestos are no longer allowed to be used in residential applications. Additionally, there are naturally occurring arsenic levels at the

site that exceed present RWQCB Environmental Screening Levels. The applicant has prepared several reports carefully evaluating potential hazards and hazardous materials at the project site:

- Phase I Soil Analysis. Phase I Environmental Site Assessment, Camphora Labor Camp, 32101 McCoy Road, Soledad, California. Prepared by Earth Systems Pacific, dated July 10, 2009.
- Additional Phase II Pesticide Testing, Camphora Apartments, 32101 McCoy Road, Soledad, California. Prepared by Earth Systems Pacific, dated May 16, 2011.
- Phase II Addendum - Arsenic, Camphora Apartments 32101 McCoy Road, Soledad, California. Prepared by Earth Systems Pacific, dated August 16, 2011.

Each of these reports and the conclusions within were reviewed by the California Department of Toxic Substance Control (DTSC), who responded with a letter to Mr. Seth Capron, Senior Project Manager, South County Housing Corporation, dated August 18, 2011. These reports and the conclusions and recommendations of the California Department of Toxic Substance Control will be discussed further below.

a) Less Than Significant Impact. The project is the demolition of existing deteriorating residential structures and replacement with the same number of modern garden apartments. While there are concerns and precautions to be made during the construction process as described herein, there will be no new creation of significant hazards to the public, nor the introduction of routine transport, use or disposal of hazardous materials produced on site. Therefore the project will have a less than significant impact on the public due to routine transport, use or disposal of hazardous materials.

b) Less Than Significant Impact. As described in the Project Description and above, there is the potential of releasing several materials known to be hazardous during the construction processes. This section will address: organochlorine pesticides, lead (paint), asbestos, and naturally occurring arsenic.

The organochlorine pesticides DDE, DDT and Dieldrin.

The organochlorine pesticides DDE, DDT and Dieldrin were detected on the Site. Dieldrin, endrin and taxophene were detected on the site at levels above the California Human Health Screening Level (CHHSL) thresholds. The elevated levels are concentrated within the upper foot of soil at the site with impacts to a depth of about 2 feet at a particular sampling location (S-8). Using the California Department of Toxic Substances Control's Hazard-Risk Calculator (Cal EPA 2005) for DDE, DDT and dieldrin, the residential carcinogenic risk is 2.03 with dieldrin being the risk driver. A risk-index value greater than one indicates that the cancer risk exceeds one in one million if no remedial action is performed.

According to Mark E. Piros, P.E. Unit Chief – South Bay Counties Brownfields and Environmental Restoration Program of the CDTSC, “The risk from dieldrin, DDE and DDT in site soil ... is within the acceptable risk range as prescribed by the U.S. EPA and used by DTSC.” Toxicity measurements were applied to measurements of soil materials from the upper one foot of soil at the site. The Monterey County Monterey Health Department, Division of

Environmental Health, Hazardous Materials Management Services also concluded that the toxicological assessment conducted by the State Department of Toxic Substance Control (DTSC) determined that the concentrations of these contaminants are within the acceptable risk range as prescribed by the USEPA and DTSC. Therefore, no significant hazard to the public or the environment exists pertaining to these materials and that the addition of mitigation measures has been determined not necessary. In this manner of the existing readings being within standards accepted by the US EPA, State of California and Monterey County Health Department, there is a less than significant impact to the public or environment for this criterion.

Lead Paint and Asbestos

To address the potential discovery and resolution of lead paint and asbestos during demolition of this aging farm worker housing facility, the following conditions of approval can and will be applied to the project. As the remediation of these materials are addressed sufficiently under present laws and codes, they do not rise to the level of being mitigation measures.

Lead Paint - If, during demolition of the existing on-site residence, paint is separated from the building material (e.g. chemically or physically), the paint waste shall be evaluated independently from the building material by a qualified hazardous materials inspector to determine its proper management. All hazardous materials shall be handled and disposed in accordance with local, state and federal regulations. According to the Department of Toxic Substances Control (DTSC), if paint is not removed from the building material during demolition (and is not chipping or peeling), the material can be disposed of as construction debris (a non-hazardous waste). The landfill operator shall be contacted prior to disposal of building material debris to determine any specific requirements the landfill may have regarding the disposal of lead-based paint materials. The disposal of demolition debris shall comply with any such requirements.

Asbestos - Prior to the demolition of existing structures, the structures shall be sampled as part of an asbestos survey in compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP). If asbestos is found, asbestos-related work, including demolition, involving 100 square feet or more of asbestos containing materials (ACMs) shall be performed by a licensed asbestos abatement contractor under the supervision of a certified asbestos consultant and asbestos shall be removed and disposed of in compliance with applicable state laws. Regardless of whether asbestos is identified in any building, prior to demolition the Air Pollution Control District (APCD) shall be notified and an APCD Notification of Demolition and Renovation Checklist shall be submitted to both APCD and the RMA – Planning Department.

Complying with local, state and federal regulations in the manner described in the two conditions of approval above that will be applied to the project will assure a less than significant environmental effect for potential exposure to lead paint and asbestos.

Arsenic

There are naturally occurring Arsenic levels at the site that exceed present Regional Water Quality Control Board (RWQCB) Environmental Screening Levels and California Human Health Screening Levels (CHHSL). According to the letter to Mr. Seth Capron, Senior Project Manager, South County Housing Corporation from the California Department of Toxic

Substance Control, dated August 18, 2011, “the range of arsenic detected in soil samples collected at the site was 1.7 to 4.7 milligrams per kilogram (mg/kg). The Phase II Addendum Report concludes these detections can be attributed to naturally-occurring concentrations of arsenic. DTSC agrees that the detected arsenic is within the range of naturally occurring concentrations.”

As the California Department of Toxic Substance Control concludes that, “no further action is required at the site,” the potential impact of exposure to naturally-occurring arsenic has been determined to be less than significant.

c) No Impact. The Project is not within one-quarter mile of an existing or proposed school and as a residential land use, is not expected to emit hazardous emissions or handle hazardous or acutely hazardous materials. Therefore the project will have a less than significant impact to schools in this manner.

d) No Impact. Accessing the California Department of Toxic Substance Control website (EnviroStor June 4, 2012), (<http://www.envirostor.dtsc.ca.gov/public/>) the project site is not a listed hazardous materials site in Monterey County. The CDTSC acknowledges that an evaluation was conducted (as described herein) and that, “Row crops were grown and a labor camp was located on the site in the past. At the time the Phase I Environmental Site Assessment was performed, there were six occupied multi-residential structures on the site. Development of the site as a multi-family apartment complex was planned at the time DTSC issued the no further action letter.” Therefore the project will have a less than significant impact to the public or the environment for potential exposure to listed hazardous materials site in Monterey County.

e) – f) Less Than Significant Impact. Referencing Monterey County GIS data for Monterey County reveals that no public or special use airports are within two miles of the Camphora Apartment Replacement project site, and therefore no public safety hazard is assumed as related to the project’s vicinity to public or special use airports. While private airstrips in the Salinas Valley serve to support agricultural production in the Valley, no private airstrips have been identified in the vicinity of the project site. Therefore the project will have a less than significant impact to public safety in this manner.

g) – h) Less Than Significant Impact. The project is the replacement of existing residential units with the same number of units in the same location and is considered urban and not adjacent to wildlands. No conflict or interference with emergency response plans or emergency evacuation plans is anticipated. The project site is not located within a State Responsibility Area (SRA) fire hazard zone, but is within the Mission Soledad Rural Fire Protection District. Development review comments received from the Fire Department offer a condition of approval that the project’s water system not only meet drinking water demands but meet the requirements for fire suppression. Therefore the project will have a less than significant impact to emergency response plans, and will not expose people or structures to wildland fire risks.

9. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements? (Source: 1,6,16)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)? (Source: 1,6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial <u>erosion or siltation</u> on- or off-site? (Source: 1,5,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 <u>flooding</u> on- or off-site? (Source: 1,5,6,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? (Source: 1,5,6,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality? (Source: 1,5,6,7,16)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? (Source: 1,2,5,6,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? (Source: 1,2,5,6,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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? (Source: 1,2,5,6,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow? (Source: 1,2,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) Less Than Significant Impact. The project is not expected to violate any water quality standards or waste discharge requirements, in that it is the redevelopment of an existing facility to meet modern housing and building and safety codes, including connecting the apartment complex to a formal sewer system and cleaning up and removing the existing septic treatment areas and facilities. The Monterey County Water Resources Agency will be requiring a stormwater detention plan to address on-site and off-site impacts. The plan will include detention facilities to attenuate the impact of impervious surface stormwater runoff. Best management practices will be incorporated into construction activities to attenuate unintended run-off. In this manner the project will have a less than significant impact to water quality standards or waste discharge requirements. Therefore the project will have a less than significant impact to water quality and waste discharge requirements.

b) Less Than Significant Impact. The existing well on the property will continue to serve the residents. The well was drilled in 1996 to a depth of 690 feet, yields an estimated 500 gallons per minute and meets current drinking water standards. In this manner, the project is not expected to 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 in that the service level and draw needed from this well will still serve the same number of residential units. Therefore the project will have a less than significant impact on depletion of groundwater supplies.

c) – d) Less Than Significant Impact. The project will not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or offsite or substantially increase the rate or amount of surface run-off in a manner that would result in flooding on- or off-site., in that the project area is in a flat area of the Salinas Valley and no substantial grading is to occur changing contours or surface flow directions or generally increasing erosion. No stream channels or river courses will be affected by the redevelopment of this site. A landscaped berm will be incorporated into the western frontage of the project site that may affect some flows and drainage, but this is not considered to be significant. Therefore the project will have a less than significant impact on existing drainage patterns of the site or area.

e) Less Than Significant Impact. The project will not substantially 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, in that the Water Resources Agency has required a stormwater detention plan to address on-site and off-site impacts, so that such impacts do not occur. The plan will include detention facilities to attenuate the impact of impervious surface stormwater runoff and will include oil/grit separators for paved parking areas. The applicant will also be required to provide certification from a registered civil engineer or licensed contractor that stormwater detention facilities have been constructed in accordance with the approved drainage plan. Therefore the project will have a less than significant impact on the creation or contribution of runoff.

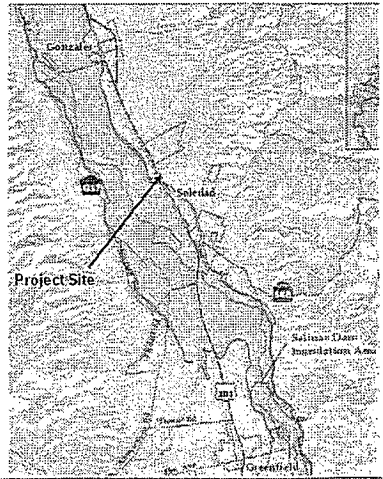
f) Less Than Significant Impact. The project will not substantially degrade water quality, in that the Monterey County Environmental Health Bureau is requiring that water system improvements

meet the standards as found in Titles 17 and 22 of the California Code of Regulations and as found in the Residential Water Supply Standards. Additionally, the existing onsite wastewater treatment system (OWTS) will be demolished or abandoned pursuant to the standards found in Monterey County Code (MCC), Chapter 15.20.090. In this manner the project will not substantially degrade water quality. Therefore the project will have a less than significant impact on water quality.

g) - h) No Impact. Drawing from Geographical Information System maps prepared by the County of Monterey included in the 2010 General Plan, the project would not place housing within a 100-year flood hazard area, nor place structures within a 100-year flood hazard area which would impede or redirect flood flows. Therefore the project will have a less than significant impact regarding these criteria.

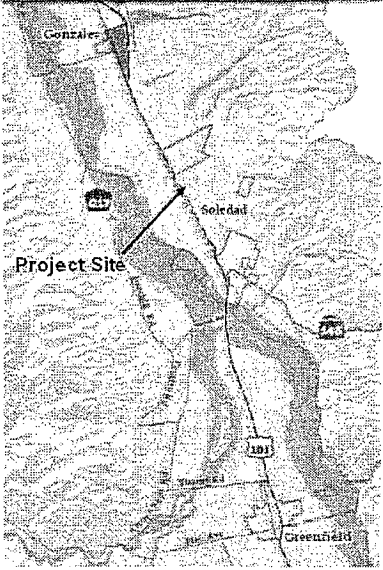
100-year Flood Hazard Area indicated in shaded areas west of the site running in a north west to southeast direction.

i) Less Than Significant Impact. While proximate to areas that may become inundated as a result of dam failure, the project site, agriculture fields and developments on the east side of US Highway 101 in this vicinity are not modeled to be subject to significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. Therefore the project will have a less than significant impact regarding this criterion.



Salinas Dam Failure Inundation Areas indicated in shaded areas west of the site running in a north west to southeast direction.

j) No Impact. The project site and location in the central portion of the Salinas Valley do not expose it to inundation by seiche, tsunami, or mudflow. Therefore the project will have no these criteria.



impact on

10. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community? (Source: 1,2,3,5,18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? (Source: 1,2,3,4,6,16)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan? (Source: 1,5,7,19,23)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) Less than Significant Impact: The project is the demolition and reconstruction of a long-standing residential complex housing approximately 185 persons among 44 units. The potential for permanent displacement and division of this community could be considered potentially significant – yet the applicant, South County Housing Corporation has built into their project a formal Relocation Plan (Reference 18) whose intent and purpose is to retain as many qualifying residents as possible.

The Relocation Plan provides for Moving Expense Payments and Temporary Relocation Expenses where housing costs will be limited to their current rent plus utilities. “South County Housing will pay any increased costs for housing directly to the prearranged temporary landlord. Due to the temporary nature of these moves accommodations will also be made for storage of personal property, if necessary. If a household does not return to the Camphora Apartments upon notification of an available unit, any rental or relocation assistance will be terminated.”

From the Relocation Plan prepared by Auto Temp for South County Housing (SCH):

As a result of the Project, based upon available information, SCH anticipates that all but five of the existing households will be temporarily displaced, to allow reconstruction to occur in an orderly and safe manner. Five of the households have not participated in the interview process and are presumed to be over income to remain on site and will potentially be permanently displaced.

This Plan sets forth policies and procedures which would be necessary to conform to statutes and regulations established by the Federal, Uniform Relocation Act (46 U.S.C. § 4600 et seq.), its implementing regulations (49 C.F.R.) Part 24); and, the California Relocation Assistance Law, California Government Code Section 7260 et seq (the “CRAL”) and the California Relocation Assistance and Real Property Acquisition

Guidelines, Title 25, California Code of Regulations, Chapter 6, Section 6000 et seq. (the "Guidelines") for residential displacements and the funding agencies' own rules and regulations.

Currently, there are 185 residents on site, of which 66 are under the age of 18. Most households with children expressed a desire to remain in the current school district during their temporary displacement. Nine households rely upon public transportation, while 13 households requested to remain in close proximity to doctors and medical facilities.

The standard housing density utilized provides for two (2) persons per bedroom and one person in a common living area for tenant occupied units although, this can be adjusted to include two persons in the common living area. If a family's size is above or below these standards, then those families would be referred to appropriate sized housing, if available. Currently, thirteen households are considered "over-crowded", and the newly constructed units, which include three bedroom units, will be able to accommodate the larger households.

Relocation activities will consider individual household needs to be close to public transportation, employment, schools, public/social services and agencies, recreational services, parks, community centers, or shopping.

Relocation Assistance information and assistance will be provided in the primary language of the displaced occupants, in order to assure that all displaced occupants obtain a complete understanding of the relocation plan and eligible benefits.

In this manner of the applicant complying with state laws regarding the potential of displacements of persons and the potential to divide and established community, the applicant's proposed Relocation Plan provides for the current residents to maintain and continue in their community. In this manner this potential impact is considered to be less than significant.

b) Less Than Significant Impact. The project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. The following table has been assembled from the applicable policies of the 2010 General Plan to demonstrate the project's consistency with the policies and regulations.

GPU Goals and Policy Numbers	Text of GPU Goals and Policies	Review of project consistency
GOAL LU-1 PROMOTE APPROPRIATE AND ORDERLY GROWTH AND DEVELOPMENT WHILE PROTECTING DESIRABLE EXISTING LAND USES.		
LU 1.7	Clustering of residential development to those portions of the property which are most suitable for development and where appropriate infrastructure to support that development exists or can be provided shall be strongly encouraged. Lot line adjustments among four lots or fewer, or the re-subdivision of more than	The project is the redevelopment of an existing 44 residential units on a parcel less than 5 acres in area. While the site has been used for concentrated residential living for decades, this housing Replacement Project will make the site and living conditions more

GPU Goals and Policy Numbers	Text of GPU Goals and Policies	Review of project consistency
	four contiguous lots of record that do not increase the total number of lots, may be allowed pursuant to this policy without requirement of a general plan amendment.	"suitable." Water and transportation infrastructure are present and sewer service will be provided by a connection to the City of Soledad sewer service and through a LAFCO action.
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.	<p>The 2010 General Plan designates the property as Farmland. The General Plan also provides that Affordable Housing Overlays (AHO) may be proposed by applicants.</p> <p>If a property meets all of the suitability criteria, the property owner may voluntarily choose to develop an Affordable Housing Overlay project, rather than a use otherwise allowed by the underlying land use designation. See discussion below for Policy 2.11. With an AHO designation applied to the property, and development according to the proposal provided by the applicant, the project will be consistent with the policies of the Plan.</p>
LU-1.12	Structures in electrical transmission corridors or rights-of-way shall be prohibited	An electrical transmission line presently runs through the property in a northwest to southeast direction. New structures have been sited to not be directly under these transmission lines and to meet the setback needs of the utility.
LU-1.18	If the standards in this General Plan render a legal lot of record substandard in size, the substandard size of the parcel shall not by itself render the parcel a legal nonconforming use. Any proposed expansion, enlargement, extension, or intensification of uses on such a lot shall not be prohibited due to its substandard size unless there are overriding public health impacts. Development of the lot shall comply with all other policies, standards and designated land use requirements of this Plan.	The 4.6 acre parcel is zoned F/40 and maintains the legal, but non-conforming Camphora Housing Development. Standards for this F/40 district most appropriately provide for farming operations and relatively large parcels and become complicated for smaller parcels that have relatively greater lot coverage needs. While this policy would not necessarily prohibit the "extension" of non-conforming uses on such a small lot, the applicant's proposal to develop consistent with the parameters of the AHO designations described in the General Plan will allow the redevelopment of the lot to comply with additional policies, standards and designated land use requirements of this Plan, and become a legal and conforming development. See discussion of the <i>Affordable / Workforce Housing Program</i> below.
LU-1.19	Community Areas, Rural Centers and	The Applicant has proposed that an

GPU Goals and Policy Numbers	Text of GPU Goals and Policies	Review of project consistency
	<p><u>Affordable Housing Overlay</u> 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.....</p>	<p>Affordable Housing Overlay (AHO) be applied to this property and has proposed a development consistent with and exceeding the affordability and suitability criteria for such developments. In Policy LU-1.19, the General Plan treats AHOs equally to Community Areas and Rural Centers as being a priority for development in unincorporated areas. In this manner, the project is not subject to the Development Evaluation System required of LU-1.19. The criteria and thresholds for an existing or proposed designation of an AHO are clarified in the Affordable / Workforce Housing program of LU-2.11 below.</p>
LU-1.20	<p>Residential development within unincorporated Monterey County shall be limited to area build-out. Area build-out means specific land use/density designations as mapped in the area plans and adopted as part of this General Plan. The Resource Management Agency shall develop a tracking system for build-out by Planning Area and shall present an annual report before the Planning Commission.</p>	<p>As stated above, the property is designated as F/40 and the development standards within that designation apply well to large lot farming activities. The term "build-out" is relatively incongruous with a discussion of agricultural and farmland uses as F/40 it is not a district intended for residential development – only those residential units that would support and enhance the use of prime, productive and unique farmlands. F/40 allows: single family dwellings, not exceeding four accessory to the agricultural use; licensed residential care homes; and farm worker / employee housing facilities – yet parcel sizes can range from less than one acre to thousands of acres. The redevelopment of 44 residential units on this less than 5 acre site will not contribute additional residential density as at least 44 units have existed on this site for decades.</p>
<p>GOAL LU-2 ENCOURAGE RESIDENTIAL DEVELOPMENT OF VARIOUS TYPES AND DENSITIES FOR ALL INCOME LEVELS IN AREAS WHERE SUCH DEVELOPMENT WOULD BE ACCESSIBLE TO MAJOR EMPLOYMENT CENTERS AND WHERE ADEQUATE PUBLIC SERVICES AND FACILITIES EXIST OR MAY BE PROVIDED.</p>		
LU-2.1	<p>Sufficient sites for housing shall be designated, including rental housing, factory built housing and mobile homes, to make adequate provision for the existing and projected needs of all economic segments of the community.</p>	<p>This policy relates more to where new housing sites should be located in the County. The redevelopment of this site for a very low and low income demographic does though provide for an existing and projected (continuing) need to provide such housing opportunity.</p>
LU-2.2	<p>Residential development shall be limited in areas that are unsuited for more intensive development due to physical hazards and</p>	<p>Reuse and redevelopment of the present site should not be limited here for need of protecting natural resources, avoiding</p>

GPU Goals and Policy Numbers	Text of GPU Goals and Policies	Review of project consistency
	development constraints, the need to protect natural resources, or the lack of public services and facilities.	physical hazards and constraints or for lack of public services. Having been intensely used for decades for farmworker housing at this same density, the site is suited for this "intensive" development". The provision of additional public services, such as the connection to the Soledad sewage treatment system, and the removal of aged and failing onsite septic systems further protect the residents as well as adjacent farmland and agricultural resources.
LU-2.3	High density residential areas shall be designated closest to urban areas, in community areas, rural centers or existing unincorporated communities.	This policy relates more to where new high density housing sites should be located in the County. Projects that meet the criteria for establishment of an Affordable Housing Overlay are treated equally under the 2010 General Plan as Community areas and Rural Centers. While certainly not an "urban" setting, the project is and will be rebuilt to a density exceeding 9.5 units to the acre. And while the project is still to be served by an on-site high producing water well instead of an municipal water system, the project's tie-in to Soledad's sewage treatment system is a good utilization of its proximity to the urban services afforded by the City of Soledad.
LU-2.4	Areas designated for residential use shall be located with convenient access to employment, shopping, recreation, and transportation. Higher density residential areas should be located with convenient access to public transit.	The site is not presently designated for residential use but with the AHO will be. As the site is to continue to serve farm workers, the site does maintain convenient access to employment and is quickly accessible to Highway 101. The site has been designed in consideration of farm worker buses being able to easily enter and drive through and pick up employees. The nearest shopping opportunity will remain the City of Soledad.
LU-2.8	The County shall designate and establish regulations for an Agricultural Buffer/conservation easement (AB) designation to protect the existing agricultural operation (see <i>Policy AG-1.2</i> for buffer criteria).	See below.
AG-1.2	The County shall require that well-defined buffer areas be provided as partial mitigation for new non-agricultural development proposals that are located adjacent to agricultural land uses on farm lands designated as Prime, of Statewide	The site presently has relatively no agriculture buffer and does not maintain a conservation easement for this purpose. The 4.6 acre residentially developed site is not considered Prime Farmland, of Statewide Importance, Unique, or of

GPU Goals and Policy Numbers	Text of GPU Goals and Policies	Review of project consistency
	<p>Importance, Unique, or Local Importance.</p> <p>a. Criteria. The following criteria shall be used to establish agricultural buffers to protect current and reasonably foreseeable future agricultural operations:</p> <ol style="list-style-type: none"> 1. The type of non-agricultural use proposed, site conditions and anticipated agricultural practices. 2. Weather patterns, crop type, machinery and pesticide use, existence of topographical features, trees and shrubs, and possible development of landscape berms to separate the non-agricultural use from the existing agricultural use. <p>b. Buffers. Buffers and/or easements shall be:</p> <ol style="list-style-type: none"> 1. Designed to comply with applicable state and local laws regulating school buffers, pesticide buffers, and other controls. 2. Provided on the land designated for the proposed new use and not on the adjacent agricultural land unless by mutual agreement between the two landowners. Buffer maintenance will be the responsibility of the underlying fee title owner and shall be enforceable by the County of Monterey. 3. Designed to be used for the purposes and manner described in this policy and for no other purposes unless agreed to by abutting landowners. Drainage, shading, vegetation, and erosion control shall be made beneficial to the adjacent agricultural use. <p>In circumstances in which a buffer is not meant to be permanent, it will be terminated once the underlying agricultural purpose for the buffer no longer exists. The Agricultural Advisory Committee shall review and make recommendations on establishment of, and changes to, buffer zones.</p>	<p>Local Importance -- although neighboring vineyard properties to the northeast and southeast are considered Prime Farmland.</p> <p>The new project sets residential structures and the community building back into the property 75-90 feet from property lines. Within this 75-90 foot wide area is the circular drive path through the site, the pedestrian pathways, landscaping and tree plantings, water storage tanks, carports with solar arrays, and new perimeter fencing.</p> <p>The Camphora Apartment Replacement project has been designed to assure that drainage, shading, vegetation / landscaping, and erosion control will not impact or compromise adjacent agricultural uses.</p> <p>In discussing the plan with the Monterey County Agricultural Commissioners Office, they found the 75-90 foot wide agricultural buffer proposal to be an improvement over the present Camphora Apartment configuration which has structures 15 to 22 feet from property lines. The Agricultural Commissioners office indicated that the proposal was in keeping with the intent and purposes of agricultural buffers as provided for in the Plan</p> <p>It is apparent that after five decades of this site being used for residential purposes that the clear demarcation and fencing of the residential property from the adjacent vineyards has not deteriorated or compromised the adjacent agricultural practices. The continued use of this site by virtually the same residents and with new perimeter fencing should not change this relationship.</p>
<i>Affordable/Workforce Housing Program</i>		
LU-2.11	The County shall encourage the development of affordable and workforce housing projects through the establishment of an Affordable Housing Overlay Program, based on the	The County has not yet developed the Affordable Housing Overlay Program since adoption of the General Plan October 2010, yet this project has been

GPU Goals and Policy Numbers	Text of GPU Goals and Policies	Review of project consistency
	<p>following parameters.</p> <p>a. The following areas shall be designated as Affordable Housing Overlay (AHO) Districts: (1)-(5)</p> <p>b. Properties shall meet the following suitability criteria in order to be eligible for the Affordable Housing Overlay Program:</p> <p>(1) The property is located within an Affordable Housing Overlay (AHO) District;</p> <p>(2) Development within the Affordable Housing Overlay District shall be approved on a project-by-project basis and achieve the following levels of affordability (plus or minus 1%):</p> <ul style="list-style-type: none"> • 10% Very Low • 15% Low • 15% Moderate • 20% Workforce I, and • 40% Workforce II. <p>Individual projects may increase the percentage of Very Low, Low and Moderate income categories by reducing the percentage of Workforce I or Workforce II income levels. A project may be allowed to replace up to 25% of the Workforce II housing allocation with market-rate units if one or more of the following criteria are met:</p> <p>i) the County has identified a different mix of levels needed for affordable housing in the local area;</p> <p>ii) special economic factors, such as land cost or infrastructure upgrades, affect the cost of development within the local area;</p> <p>iii) the applicant proposes to accommodate at least 15% farm worker housing.</p>	<p>submitted for review and processing.</p> <p>This is not applicable as the legal but non-conforming farmworker housing complex already exists outside of one of the five districts indicated in the GP. The applicant is requesting to newly place an AHO district over the Camphora Apartment site to make it legal and conforming to code.</p> <p>The applicant is requesting to newly place an AHO district over the Camphora Apartment site.</p> <p>The Camphora Apartment Replacement Project will be providing 100% Farm worker (and related family) housing.</p> <p>The project is consistent with the minimum percentages listed to the left as developers are allowed to increase the percentage of Very Low, Low and Moderate income categories by reducing the percentage of Workforce I or Workforce II income levels. The increase of these very low and low income levels serves the housing needs of farm workers.</p> <p>While the applicant, who proposes to provide much more than 15% farm worker housing units under item iii), may request to provide some market rate units, it is staff's understanding that the applicant's funding sources require South County Housing to make this 100% affordable to farm workers. Such a project, not constrained by these funding source requirements could though provide an alternative combination of affordability and still meet the requirements.</p>
	<p>3) Mixed use development that combines residential with commercial uses shall be encouraged to tie in with surrounding commercial and residential land uses. A mix of housing types shall be provided on sites in excess of 5 acres, i.e., at least two</p>	<p>This is not a mixed use development.</p> <p>The site is less than 5 acres in area and a single housing type (for-rent apartments) is proposed.</p>

GPU Goals and Policy Numbers	Text of GPU Goals and Policies	Review of project consistency
	<p>product types, such as for-rent apartments, for-rent townhomes, ownership townhomes, or ownership single family homes. On sites of less than 5 acres, a single housing type may be allowed. The mix of housing types and designs shall be sensitive to neighboring uses.</p>	
	<p>c. If a property meets all of the suitability criteria in "b", above, the property owner may voluntarily choose to develop an Affordable Housing Overlay project, rather than a use otherwise allowed by the underlying land use designation.</p>	<p>The Applicant's project meets and exceeds the (income) suitability criteria in (b) above and has proposed to develop a voluntary AHO project.</p> <p>By meeting the criteria and requesting the AHO designation, this will allow the applicant to supplement the underlying allowances of the F/40 District with an Affordable Housing Overlay Project. In this manner the resulting 44 unit Farmworker Housing project will be legal and conforming to the new F/40-AHO district to be applied to this 4.6 acre parcel.</p>
	<p>d. The minimum density for an Affordable Housing Overlay project shall be 6 units per acre, up to a maximum of 30 units per acre. An average density of 10 units per acre or higher shall be provided. The maximum lot size for detached single-family affordable units shall be 5,000 square feet.</p>	<p>The property exceeds the minimum density requirements for an AHO, and is within the maximum density allowed.</p> <p>44 units / 4.6 acres = 9.56 units per acre.</p>
	<p>e. To encourage voluntary participation in the Affordable Housing Overlay process, the County shall provide incentives for Affordable Housing Overlay projects such as:</p> <ol style="list-style-type: none"> (1) Density bonuses; (2) Streamlined permitting process, including assigning experienced staff to such projects, hiring outside contract planners, plan checkers and building inspectors (at the cost of the developer) (3) Waiver or deferral of planning and building permit fees (but not fees for the purpose of financing infrastructure); (4) Priority allocation of resource capacity such as water and sewer over other projects not yet approved. (5) Modified development standards and grant funding assistance. 	<p>The applicant's project meets the criteria for a waiver of land use and development fees under the existing fee ordinance for the Monterey County RMA Planning Department. Fees to conduct environmental review are not subject to the fee waiver allowance.</p>

GPU Goals and Policy Numbers	Text of GPU Goals and Policies	Review of project consistency
	f. Within Community Areas, affordable housing projects meeting the provisions of this policy may proceed prior to adoption of a Community Plan and needed regional infrastructure as long as all project related infrastructure improvements are made concurrent with the development.	This project is not within a Community Plan area.
	g. Within Rural Centers, affordable housing projects meeting the provisions of this policy may proceed prior to preparation of an Infrastructure and Financing Study as long as all project related infrastructure improvements are made concurrent with the development.	This project is not within a Rural Center
	h. When affordable housing overlay projects are proposed in Community Areas that are also designated Redevelopment Areas, tax increment may be used from the project area to finance off-site infrastructure and level of service improvements and to subsidize the Very Low and Low income units within the Affordable Housing Overlay project.	This project is not within a Community Area and is not in a designated Redevelopment Area. Redevelopment Areas are no longer sanctioned /empowered by the State of California.
	i. The Board of Supervisors shall review the 25% exemption cap for market rate units (<i>paragraph b.2 above</i>) every two years to assure that this Affordable Housing Overlay policy achieves its intended goal of encouraging developers to voluntarily produce Affordable Housing Overlay projects.	This October 2012 will be two years since GP approval
LU-2.12	<p>Monterey County shall establish a program for retaining affordable housing units. For-sale housing units with affordability restrictions developed within redevelopment project areas (Boronda, Castroville, Fort Ord, and Pajaro), Community Areas and Rural Centers prior to the adoption of their Plans, as well as any project developed under the Affordable Housing Overlay Program shall be consistent with term of affordability provisions in State Redevelopment law. Rental units shall be deed restricted in perpetuity countywide.</p> <p>(More to LU-2.12 yet not applicable to rental units)</p>	<p>The project does not develop for-sale units, but it is a proposed project under the AHO program.</p> <p>The affordability provisions in State Redevelopment law have gone away with dissolution of Redevelopment Agencies February 1, 2012.</p> <p>According to Jane Barr of the Monterey County Economic Development Department, "the Project is in conformance with the Affordable Housing Overlay. Specifically, it conforms to Section LU-2.12 regarding the County's program for retaining affordable housing units. It is expected that the Project will be 100% affordable. The rental units will be deed-restricted for a term that is consistent with other affordable housing funding sources. It is expected that the term will be for a minimum of 55 years."</p>
LU-2.13	The County shall assure consistent application	Whereas the County must act

GPU Goals and Policy Numbers	Text of GPU Goals and Policies	Review of project consistency
	<p>of an Affordable Housing Ordinance that requires 25% of new housing units be affordable to very low, low, moderate, and workforce income households. The Affordable Housing Ordinance shall include the following minimum requirements:</p> <ul style="list-style-type: none"> a. 6% of the units affordable to very low-income households b. 6% of the units affordable to low-income households c. 8% of the units affordable to moderate-income households d. 5% of the units affordable Workforce I income households 	<p>evenhandedly in requiring new housing units created under an Affordable Housing Ordinance to have 25% of the units affordable according to the 6%, 6%, 8% and 5% figures, the applicant has proposed a project where all of the 44 units will be affordable to very low and low-income farm workers. This greatly exceeds the targeted minimums.</p>
City Centered Growth		
LU-2.14	<p>Work with AMBAG and cities to direct the majority of urban growth including higher density housing development into cities and their spheres of influence with an emphasis on redevelopment and infill.</p>	<p>The project is not really urban growth – but it is higher density housing development according to County Standards.</p> <p>The project is the re-use of a developed site between the major developed areas of the City of Soledad: the city core and the Correctional Facilities to the north. Upon approval of LAFCO, the City of Soledad will provide sewer service to the Camphora Apartments.</p>
LU-2.15	<p><i>Urban Reserve (UR).</i> An Urban Reserve overlay shall be applied in areas where an incorporated City may expand (annex) or provide the necessary infrastructure to a proposed project. Growth limits identified in a City’s adopted general plan and determined to be consistent with the County’s adopted General Plan may be included as part of the Urban Reserve area. Expansion of an Urban Reserve shall be subject to <i>Policy LU-2.18</i> and may be established through a Memorandum of Understanding (MOU) between a City and the County. Development in an Urban Reserve area shall be determined by the County’s underlying land use designation. The County shall consult with the pertinent City regarding projects located within their Urban Reserve.</p>	<p>The Camphora Apartment Complex is approximately 1.3 miles north of the City of Soledad Sphere of Influence line and is not within an Urban Reserve (UR) Area.</p> <p>While the project does not propose to expand the City of Soledad’s Sphere of Influence, the City of Soledad has offered that it Can and Will serve the project with sewer service. As discussed within this report, a City sewer connection runs from the Correctional facilities north of the project and runs southward parallel to Highway 101.</p>
LU-2.16	<p>In coordination with the cities, sufficient land shall be designated to locate new housing as close to employment centers as feasible, and to minimize conflicts, competition, and consumptive land use patterns.</p>	<p>This policy relates more to where new housing sites should be located in the County. The redevelopment of the long-used site though does minimize conflicts, competition, and consumptive land use patterns.</p>
LU-2.19	<p>The County shall refer amendments to the</p>	<p>While the project was referred to the City</p>

GPU Goals and Policy Numbers	Text of GPU Goals and Policies	Review of project consistency
	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.	of Soledad for their review, the project does not represent an increase in new housing units, merely the replacement of 44 existing legal but non-conforming units. The addition of the Affordable Housing Overlay district (zone change) has been referred to Soledad for review and comment and will serve to have the resulting development be in conformance with the Monterey County General Plan and codes.
GOAL C-1 ACHIEVE AN ACCEPTABLE LEVEL OF SERVICE BY 2030		
C-1.8 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.	The County Traffic Impact Fee is currently being developed in accordance with the General Plan to address cumulative impacts to the County roadway system. In this instance, McCoy Road would be the County facility of potential impact. This project's traffic report did not identify cumulative impacts to the County Roadway system though; therefore mitigation fees for cumulative impacts to the County roadway system would not be applicable, according to the Public Works Department.
C-1.11	In addition to the County Traffic Impact Fee established in <i>Policy C-1.8</i> , 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.	The Regional Traffic Impact Fee was developed to address cumulative impacts to the regional roadway system, and is required to be applied to development by adopted County Ordinance. Such regional facilities in this case would be Highway 101 itself and the Camphora Gloria on- and off- ramps and overpass. Pursuant to Monterey County Code Chapter 12.90 the applicant shall pay the Regional Development Impact Fee (RDIF).
C-4.2	All new road and interior circulation systems shall be designed, developed, and maintained according to adopted County standards or allowed through specific agreements and plans.	The project site proposes two driveways for access to the parking areas. Review of the plan proposed by the applicant shows conformance to the County's parking standards. Adoption of the development plan proposed, supplemented by a condition of approval applied to the project for conformance to standards will assure that this Policy is met.

GOAL OS-1		
RETAIN THE CHARACTER AND NATURAL BEAUTY OF MONTEREY COUNTY BY PRESERVING, CONSERVING, AND MAINTAINING UNIQUE PHYSICAL FEATURES, NATURAL RESOURCES, AND AGRICULTURAL OPERATIONS.		
OS-1.8	Programs to encourage clustering development in rural and agricultural areas to maximize access to infrastructure, protect prime agricultural land, and reduce impacts to designated visually sensitive and critical habitat areas shall be established.	While specific programs to encourage clustering development in rural and agricultural areas have not yet been developed, the redevelopment of the 44 units on this already impacted 4.6 acre site does serve to protect prime agricultural lands, in that no new impacts to exiting agricultural areas are anticipated. At a density exceeding 9 units per acre this project may be considered to be a clustered development.
GOAL PS-3		
ENSURE THAT NEW DEVELOPMENT IS ASSURED A LONG-TERM SUSTAINABLE WATER SUPPLY.		
PS-3.1	<p>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.</p> <p>This Requirement shall not apply to: c. development related to agricultural land uses within Zone 2C of the Salinas Valley groundwater basin.</p>	<p>The project is not necessarily “new” development in that the existing condition of the property includes 44 residential units and the completed project will have an equivalent 44 units. “Redevelopment” would be a more appropriate term.</p> <p>Farmworker Housing is directly related to the surrounding agricultural uses.</p> <p>The project is within Zone 2C of the Salinas Valley groundwater basin.</p> <p>Therefore this policy does not apply to this project.</p>

Additional Policies of the Public Service Element direct the County to:

- Create additional criteria and implementation methods, programs and ordinances if necessary to assure Long-term sustainable water supply for new development. (PS-3.2)
- Create specific criteria to evaluate the adequacy of all new domestic wells. (PS-3.3)
- Assess impacts on adjacent wells and in-stream flows for high-capacity wells, including high-capacity urban and agricultural wells. (PS-3.4)
- Disallow construction of wells in known areas of saltwater intrusion. (PS-3.5)
- Coordinate and collaborate with all agencies responsible for the management of existing and new water resources. (PS-3.6)
- Develop a program to eliminate overdraft of water basins. (PS-3.7)

Policies PS-8 through PS-3-15, also give direction to the County as in the above bullets, but do not necessarily speak to this Farmworker Housing Replacement project.

The project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. In this manner the project will have a less than significant effect.

c) No Impact. Redevelopment of the project site will not conflict with any applicable habitat conservation plan or natural community conservation plan. In review of the websites of the California Department of Fish and Game (CDFG) and United States Fish and Wildlife Service (USFWS) there are no adopted habitat conservation plan or natural community conservation plan along this portion of the Salinas Valley. There are plans in place to protect Yadon's piperia (*Piperia yadonii*) at Pebble Beach, Yadon's Piperia and Hooker's Manzanita at the Presidio of Monterey and Presidio of Monterey Annex Monterey County, and numerous species at Fort Ord: smith's Blue Butterfly, Western snowy plover, California red-legged frog, sand gila, Monterey spineflower, robust spineflower, black legless lizard and Yadon's Piperia. In this manner there will be no impact to these resources or conflicts with adopted plans at the project site.

11. MINERAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (Source: 1,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (Source: 1,2,3,7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) – b) No Impact. See Section IV.

12. NOISE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source: 1,2,15,19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? (Source: 1,2,15,19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (Source: 1,2,15,19)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (Source: 1,2,15)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (Source: 1,2,3,5,7,15)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? (Source: 1,2,3,5,7,15)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) Less Than Significant Impact. As introduced in the project description, U.S. Highway 101 and the Union Pacific Railroad (UPRR) are located to the southwest of the site and provide a significant source of noise. An Acoustical Analysis was provided by the applicant that describes these environmental conditions and offers mitigation measures that the applicant has incorporated into the project design.

While the railroad line is 365 feet to the west of the closest apartment building, approximately four freight trains and two passenger trains pass through the Salinas Valley daily. There is an at-grade crossing at Camphora Road across the freeway and slightly to the north of the project site. Train engineers are required to sound the warning horn when approaching within approximately 1000 feet of a grade crossing. Train noise levels are therefore higher at locations near grade crossings. The report also indicates that the train warning horns were only faintly audible above the traffic noise produced by Highway 101.

Special building construction and site development considerations have been identified as necessary to attenuate elevated noise levels for some of the closer units to these noise generators. The Health and Safety Element of the 2010 General Plan states that interior noise exposure within new residential developments should not exceed acceptable levels. Most local jurisdictions apply an interior noise standard of 45 dB CNEL (or DNL). This is consistent with the interior noise exposure criteria referenced by the California Noise Insulation Standards and the U.S. Department of Housing and Urban Development (HUD).

The county's exterior noise level standard is 65 dB CNEL within outdoor activity areas of multi-family residential uses. Common outdoor activity areas are located throughout the project site and include a tot lot, two mini soccer fields, several BBQ areas and a half-court basketball area. Individual outdoor activity areas for the project include individual patios and second-floor decks at each of the apartment buildings.

Most common outdoor activity areas would be located at least 300 feet from the center of the freeway. Additionally, the project developer has proposed that an earthen berm with a minimum height of six (6) feet be constructed along the frontage of the site. When attenuation of sound with increasing distance from the freeway and acoustic shielding provided by the earthen berm are considered, it is concluded that all common outdoor activity areas would comply with the county's 65 dB CNEL exterior noise level standard.

The proposed buildings have been designed and oriented so that individual patios and decks are partially enclosed and do not directly face the freeway. The earthen berm would provide acoustic shielding of individual patios at the lower-floor level. Noise exposure within individual patios and decks would therefore be expected to comply with the county's 65 dB CNEL standard for all buildings except for the upper-floor decks of the closest apartment building Highway 101 and the Union Pacific Railroad.

As the applicant has incorporated recommended measures from the Acoustical Analysis into the project design to attenuate exterior and interior Noise Levels for residents, these have become features of the proposal – and do not rise to the level of being Mitigation Measures

- An earthen berm will be constructed along the west side of the property to acoustically shield common outdoor activity areas and lower-floor individual patios within the development. The berm will have a minimum height of six (6) feet relative to the finished floor elevation of the closest residential buildings. The top of the berm may be irregular in shape but should maintain the required minimum height.
- The minimum laboratory-tested STC rating for windows and sliding glass doors to be installed on the north, south and west sides of the closest apartment building to the freeway will be 32. Acoustically rated windows and sliding glass doors are not required at other locations within the project.
- Air conditioning or mechanical ventilation will be installed in all residential buildings so that windows and doors may remain closed for the required acoustical isolation.
- Exterior doors, excluding glass doors, shall be solid-core wood or insulated steel with perimeter weather-stripping and threshold seals.
- Acoustic baffles will be installed on the interior side of attic vents that face or are perpendicular to U.S. Highway 101.

In this manner of incorporating the recommended sound attenuation features into the project design and building improvement plan, the project will result in a less than significant exposure of persons to noise levels in excess of standards established in the local general plan, noise ordinance, or standards of other agencies.

b) Less Than Significant Impact. The project will not generate or expose persons to ground-borne vibrations from highway traffic, trains and adjacent agricultural practices beyond existing conditions. Therefore the project will have a less than significant impact to new exposures to ground-borne vibrations.

c) No Impact. As the project is the replacement of the same number of residential units, the project will not result in an increase in ambient noise levels in the project vicinity above levels existing without the project. Therefore there will be no impact to ambient noise levels in the project vicinity.

d) Less Than Significant Impact. While the demolition and construction activities will result in a temporary increase in ambient noise levels in the project vicinity above levels existing without the project, the residents will have been relocated and moved from the project site prior to these activities. Following construction and the cessation of the temporary increase in noise, the residents will return. The neighboring property to the north that also includes farm worker housing may experience the noises of construction, yet with the ambient noise levels of the Highway 101 and UPRR, this is expected to be less than significant.

e) No Impact. The subject property is not located within two miles of a public airport or public use airport.

f) No Impact. The subject property is not known to be within the vicinity of a private airstrip and therefore would not expose people residing or working in the project area to excessive noise levels.

13. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (Source: 1,16)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (Source: 1,2,3,5,18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? (Source: 1,2,3,5,18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) Less Than Significant Impact. The redevelopment of the apartment complex will not induce population growth at the site or in the area. While the project will be connecting to the City of Soledad Sewer, this line already exists from the city core northward to the correctional facility complex. The Camphora Apartments will merely tap into this existing in-place line. The size of the lateral has been sized to accommodate the needs of the Camphora Apartments and does not provide for additional capacity to serve future users. Therefore the project is considered less than significant in regard to growth inducing impacts.

b) –c) Less Than Significant Impact. As discussed throughout this Initial Study, the project will directly displace the present residents of the facility in order to rebuild new garden apartments on the site for those qualifying residents to return to. Please, see the discussion above under Section 10.a) Land Use and Planning. In this manner the proposal will not displace a substantial number of housing units or persons necessitating the need for replacement housing elsewhere, and is considered to be less than significant.

14. PUBLIC SERVICES		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:					
a)	Fire protection? (Source:1,6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Police protection? (Source:1,6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Schools? (Source:1,6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Parks? (Source:1,6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Other public facilities? (Source:1,6,16)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) – e) Less Than Significant Impact. No new or physically altered government facilities are needed for the project, and therefore there will be no substantial adverse impact from the non-construction of such facilities. While the project is the reconstruction of a similar number of residential units in the same location, the project does propose to connect to the City of Soledad sewer treatment system. The City of Soledad has indicated its willingness to allow the connection and has provided a letter stating that they can and will extend service to the facility.

While no new governmental facilities are to be constructed, the applicant will extend a tie-in pipe under McCoy Road and Highway 101 to reach the existing City of Soledad sewer line infrastructure. Following County review and approval of the project, a LAFCO application will be processed for an extraterritorial annexation into the City of Soledad Sewer District. Therefore the project is considered to be less than significant across these criteria.

15. RECREATION	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (Source: 1,6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (Source: 1,6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) – b) Less Than Significant Impact. Unlike the present facility, the redeveloped property will include a half court basketball area, two turf-covered play areas, a tot lot, barbecue patio and seating area, and extensive landscaping. These on-site amenities may reduce the need for persons living at the complex to travel to existing regional parks or other recreational facilities. No deterioration of existing parks or other recreational facilities is foreseen with the redevelopment of this site, and no construction or expansion of recreational facilities which might have an adverse physical effect on the environment is foreseen. In this manner there will be a less than significant effect on public recreational resources.

16. TRANSPORTATION/TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source: 1,2,3,4,6,13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with the goals, objectives, and policies of the 2010 Regional Transportation Plan for Monterey County, including, but not limited to level of service standards and travel demand measures, or other standards established by the Transportation Agency for Monterey County (TAMC) for designated roads or highways? (Source: 1,2,3,4,6,13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks? (Source: 1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Source: 1,5,6,13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access? (Source: 1,5,6,13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? (Source: 1,2,6,13)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) – b) Less Than Significant Impact. The project will add no new traffic to the roadway system. As discussed in the Land Use and Planning Section 10.b) above the project does not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system as in Goal C-1. To address cumulative impacts to the regional roadway system, the applicant shall pay the Regional Development Impact Fee (RDIF) pursuant to the requirements of Monterey County Code Chapter 12.90. In this manner of not adding traffic to County road systems and the project being required to pay fees for regional system impacts, the project's impacts on these resources is considered to be less than significant.

c) No Impact. There will be no impact to air traffic patterns.

d) Less Than Significant Impact. The redevelopment of the Camphora Apartment Complex will not increase hazards such as sharp curves or dangerous intersections, in that most work is to be performed on the 4.6 acre site and does not have public use travel-ways running through the property. Deficiencies have been identified though in the pavement width and edges of McCoy Road fronting the project at its near dead-end to the Soledad Correctional Facilities. The pavement of McCoy Road was measured to be 23 feet wide with centerline striping and no shoulders. The pavement width on McCoy Road narrows to generally 20 feet wide at the project entrance with no centerline striping. Some additional paving has been identified to supplement the existing too-narrow 20 foot roadway width of the McCoy Road frontage along the project site to meet minimum County Standards. Additionally, safety measures, such as increased signage and refreshed pavement striping and markings have been identified as needed. These will be applied as conditions of approval to the project, not mitigation measures. Presently, the site is surrounded by perimeter fencing that separates this residential use from the adjacent farmland and associated equipment use. This fence will be removed and replaced with new fencing and the potential for conflict with farm equipment will remain unchanged and negligible. Therefore, the potential impacts from hazardous design features are less than significant.

e) Less Than Significant Impact. Emergency access and general circulation through the site will be improved with the redevelopment proposal. Presently, only one driveway enters the property, paving has long since crumbled and is irregular, and driving pathways and directions are not clear or defined. Parking spaces are not demarcated and apartment numbering is not well identified. The redevelopment proposal includes two well-defined driveways off of McCoy Road and a very distinct circular driveway navigates the perimeter of the property. Five apartment buildings and the community structure will clearly be numbered and identified accordingly for emergency services, residents and guests to access. Therefore the project will not result in inadequate emergency access and is considered to be less than significant to this criterion.

f) No Impact. As the project is the replacement in-kind of existing residential facilities, there are no known impacts to policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, nor a foreseen decrease in the performance or safety of such facilities. In this manner the project is considered to have no impact on these transportation resources.

17. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (Source: 1,6,16)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? (Source: 1,6,16)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

17. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source: 1,6,16)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (Source: 1,6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Source: 1,6,16)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? (Source: 1,6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste? (Source: 1,6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

The project is not expected to violate any water quality standards or waste discharge requirements, in that it is the redevelopment of an existing facility to meet modern housing and building and safety codes, including connecting the apartment complex to a formal sewer system and cleaning up and removing the existing septic treatment areas and facilities. The Monterey County Water Resources Agency will be requiring a stormwater detention plan to address on-site and off-site impacts. The plan will include detention facilities to attenuate the impact of impervious surface stormwater runoff.

a) – c) Less Than Significant Impact. Development of the project will remove failing septic treatment facilities on the property, clean and remove contaminated soils, and will formally connect to the City of Soledad Sewer infrastructure. To accomplish this, the applicant will obtain encroachment permits to cross under McCoy Road to connect with the existing City of Soledad sewer line. No adverse environmental impacts are anticipated from the tunneling activities and connection to existing systems. As this is a residential connection, no materials placed in the sewer are expected to exceed wastewater treatment requirements of the Regional Water Quality Control Board, such as may be characterized by some industrial activities. In this manner, the impact to these several resource categories is expected to be less than significant.

d) Less Than Significant Impact. The existing well on the property will continue to serve the residents. The well was drilled in 1996 to a depth of 690 feet, yields an estimated 500 gallons per minute and meets current drinking water standards. Additional water storage will be

incorporated into the project to assure fire flow requirements are met. In this manner there are sufficient water supplies available to serve the project from existing entitlements and resources, and the impact to this resource category is considered to be less than significant.

e) Less Than Significant Impact. The City of Soledad has offered that it Can and Will serve the project with sewer service. At the time of the applicant's request for a sewer connection with the City of Soledad, a larger project of approximate 60 units had been contemplated at the site; and the City extended its offer to serve the project. Since this time the project has been sized to 44 replacement units only. A telephone call to the City of Soledad Water Resources Manager, Edward Waggoner on June 20, 2012 revealed that the treatment facility has the capacity to treat as much as 5.5 million gallons a day, while present treatment levels are only 2.2 million gallons a day. Calculations by Ifland Engineers for the project calculate that the Peak Daily Design Flow for the 44 unit development would be 105,600 gallons day. In this manner of the project only contributing 105,600 gallons per day into a system that presently has an excess capacity of 3.3 million gallon a day, this impact would be considered less than significant.

f) – g) Less Than Significant Impact. The replacement of 44 existing units with 44 new units to serve the same population of residents is not expected to generate additional solid waste disposal, nor violate any federal, state, and local statutes and regulations related to solid waste. In this manner the impact is considered to be less than significant.

VII. MANDATORY FINDINGS OF SIGNIFICANCE

NOTE: If there are significant environmental impacts which cannot be mitigated and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Source: 1-24)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that are individually limited, but cumulatively considerable? (Source: 1-24) ("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)? (Source: 1-24)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (Source: 1-24)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

a) Less Than Significant Impact. There are no significant wildlife habitat or natural features present on the site, nor examples of the major periods of California history or prehistory. Redevelopment of the project site will not conflict with any applicable habitat conservation plan or natural community conservation plans, as there are no adopted habitat conservation plans or natural community conservation plans along this portion of the Salinas Valley. Therefore the project will not have the potential to degrade the environment in this regard and is considered to be less than significant.

b) Less than Significant Impact. The redevelopment of the subject property and the replacement of 44 residential units with 44 residential units does not introduce new impacts that are cumulatively considerable. In the project description and analysis of the environmental criteria contained in the above checklist, the project has been designed to meet or exceed a LEED Gold Level standard. No thresholds of the air management district will be exceeded or require mitigation, and the project has been determined to have a less than significant effect on Greenhouse Gasses through the use of the CalEEMod air quality model prepared by County staff

and included in the analysis above. Furthermore, staff recommends that a Negative Declaration is the appropriate environmental determination for the project as no mitigation measures have been determined necessary. Beyond the temporary impacts of noise and effects related to construction vehicles, the project is considered to have less than significant impact on cumulative resources.

c) Less than Significant Impact. The project is intended to improve and correct existing adverse living conditions for the residents of the Camphora Apartment Complex. The project has been designed to alleviate overcrowding and to remove failing septic treatment systems and to connect to public sewer infrastructure. Furthermore, the project site will be built to modern building code standards and will include outdoor and recreational amenities for the residents. No significant (negative) environmental impacts have been identified for the project. The project will be a direct improvement in the quality of life for these residents. In this manner the project is considered to be less than significant in that it will not have an adverse affect on human beings.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

VIII. FISH AND GAME ENVIRONMENTAL DOCUMENT FEES

Assessment of Fee:

The State Legislature, through the enactment of Senate Bill (SB) 1535, revoked the authority of lead agencies to determine that a project subject to CEQA review had a “de minimis” (minimal) effect on fish and wildlife resources under the jurisdiction of the Department of Fish and Game. Projects that were determined to have a “de minimis” effect were exempt from payment of the filing fees.

SB 1535 has eliminated the provision for a determination of “de minimis” effect by the lead agency; consequently, all land development projects that are subject to environmental review are now subject to the filing fees, unless the Department of Fish and Game determines that the project will have no effect on fish and wildlife resources.

To be considered for determination of “no effect” on fish and wildlife resources, development applicants must submit a form requesting such determination to the Department of Fish and Game. Forms may be obtained by contacting the Department by telephone at (916) 631-0606 or through the Department’s website at www.dfg.ca.gov.

Conclusion: The project will be required to pay the fee.

Evidence: Based on the record as a whole as embodied in the Planning Department files pertaining to PLN100446 and the attached Initial Study / Proposed Negative Declaration.

IX. REFERENCES

1. Project Application/Plans
 - a. Architectural Plans and Elevations
 - b. Landscape Plans
 - c. Civil Improvement Plans
2. 2010 Monterey County General Plan
3. South County Area Plan
4. Title 21 of the Monterey County Code (Zoning Ordinance)
5. Site Visit conducted by the project planner on September 27, 2011.
6. Interdepartmental Review Comments received from Monterey County Land Use Agencies: Public Works Department, Environmental Health Bureau, Water Resource Agency, Mission Soledad Fire Department, and the Economic Development Department (Formerly Redevelopment and Housing).
7. Monterey County Geographical Information Systems (County GIS).
8. Use Permit 363, Planning Commission Resolution No. 3352: Allowing a Labor Camp with a maximum of 1,000 men, dated September 30, 1958.
9. Planning Commission Minutes, September 30, 1958, Page 16. (portion)
10. CEQA Air Quality Guidelines, Monterey Bay Unified Air Pollution Control District, Revised February 2008.
11. Geotechnical Report. "Geotechnical Engineering Report, South County Housing, Camphora Apartments, 32101 Mc Coy Road, Soledad, Monterey County, California. Prepared for South County Housing by Earth Systems Pacific, dated January 25, 2011 (LIB120132)
12. Environmental Testing Reports
 - a. Letter to Mr. Seth Capron, Senior Project Manager, South County Housing Corporation from the California Department of Toxic Substance Control, dated August 18, 2011.
 - b. Phase I Soil Analysis. Phase I Environmental Site Assessment, Camphora Labor Camp, 32101 McCoy Road, Soledad, California. Prepared by Earth Systems Pacific, dated July 10, 2009. (LIB120133)
 - c. Additional Phase II Pesticide Testing, Camphora Apartments, 32101 McCoy Road, Soledad, California. Prepared by Earth Systems Pacific, dated May 16, 2011. (LIB120135)

- d. Phase II Addendum -Arsenic, Camphora Apartments 32101 McCoy Road, Soledad, California. Prepared by Earth Systems Pacific, dated August 16, 2011. (LIB120136)
- 13. Traffic Impact Analysis.
 - a. Trip Generation and Traffic Operations Study for the Proposed Camphora Residential Development, Prepared for South County Housing by Hexagon Transportation Consultants, Inc., dated February March 1, 2011. (LIB120137)
- 14. Archeological and Historic Reports (LIB120138)
 - a. Phase I Archaeological Study for the Camphora Apartments Project, Soledad, Monterey County, California (Doane and Breschini: December 2010)
 - b. Letter to Seth Capron, South County Housing, from the Office of Historic Preservation, Regarding Farm labor Camp Demolition and Construction Project, 32101 McCoy Road, Soledad, CA. Dated August 12, 2011.
- 15. Acoustical Analysis
 - a. Acoustical Analysis, Camphora Apartments 32101 McCoy Road, Monterey County, California. BBA Report No. 10-10-039. Prepared for South County Housing by Brown-Buntin Associates, Inc. Visalia, California July 28, 2011. (LIB120139)
- 16. Utility Service / Wastewater Report
 - a. Memorandum: Preliminary Sewer Demand Calculations for Camphora Housing Redevelopment Project (Revised). Prepared by Ifland Engineers for Seth Capron, South County Housing, dated November 17, 2011. (LIB120140)
 - b. Letter. Re: "Camphora Apartments Sanitation Services Will Serve Request (sic)." From the City of Soledad to Matt Huerta, Director of Housing Development, South County Housing Corporation, dated July 27, 2010.
 - c. Letter. Re: Camphora Apartments Sanitation Services Will Serve Request. From Matt Huerta, Director of Housing Development, South County Housing Corporation to Cliff Price, Director of Public Works, City of Soledad, dated August 3, 2009. (LIB120141)
 - d. Memorandum: Preliminary Sewer Demand Calculations for Camphora Housing Redevelopment Project. Prepared by Ifland Engineers for Seth Capron, South County Housing, dated August 3, 2009.
- 17. Utility Service / Water Supply
 - a. Well Completion Report, dated November 1, 1996
 - b. Water Well Drillers Report, dated February 9, 1978
 - c. Water Well Drillers Report, dated July 6, 1974
- 18. Tenant Relocation Plan
 - a. Relocation Plan, Camphora Apartments, 32101 McCoy Road, Soledad, CA. Prepared for South County Housing, by Autotemp, dated August 2010. (LIB120143)

19. Environmental Assessment In Compliance with the National Environmental Policy Act: Camphora Farmworker Housing, 32101 McCoy Road, Soledad, Monterey County, California. Prepared For: USDA Rural Development, 744-A La Guardia Street Salinas, CA 93905. On behalf of: South County Housing, 7455 Carmel St. Gilroy, CA 95020. Prepared by RNC Environmental, LLC., dated September 15, 2011.
20. California Emissions Estimator Model (CalEEMod) for the Camphora Apartment Replacement Project, prepared by the Monterey County Resource Management Agency Planning Department Staff (May 2012).
21. The California Department of Toxic Substance Control Website (EnviroStor) (<http://www.envirostor.dtsc.ca.gov/public/>) June 4, 2012.
22. SMARA Designation Report No.7. Designation of Regionally Significant Construction Aggregate Resource Areas in the South San Francisco Bay, North San Francisco Bay, Monterey Bay Production-Consumption Regions. Prepared by the California Department of Conservation Division of Mines and Geology Under Direction of the State Mining and Geology Board, January 1987.
23. The websites of the California Department of Fish and Game (CDFG) and United States Fish and Wildlife Service (USFWS).
24. Memo from the Monterey County Public Works Department June, 19, 2012 addressing the policies of Goal C-1 of the Monterey County General Plan.