

Exhibit A

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ATTACHMENT A PROJECT DISCUSSION

General Project Description

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

The applicant has considered this direction, modified the project scope and now proposes an amendment to the Las Palmas Ranch Specific Plan (LPR SP) to allow an additional 30 residential units, a vesting tentative map to allow a subdivision resulting in 26 residential lots and an open space parcel, and a Use Permit to allow development on slopes in excess of 25%. The proposed residential lot sizes vary between 4,249 square feet and 11,785 square feet; the median lot size would be 5,796 square feet. The proposed lots are clustered within the interior of the parcel pursuant to Section 21.12.060.A of the Monterey County Zoning Ordinance, Title 21. The subdivided parcels would encompass approximately 160,000 square feet of the project site. However, due to site coverage and setback limits, less than 160,000 square feet of the project site would be developed with residences with the remainder would be left as open space). The total area of the modified project scope would be 30,000 square feet less than that of the originally proposed senior assisted living facility and would encompass approximately 23.2 percent of the project site, 4.4 percent less than the senior assisted living facility.

Similar to the originally proposed project, the residential subdivision would be accessible via Woodridge Court and a new residential roadway, portions of which would be constructed on slopes in excess of 25%. The internal roadway network includes 13 off-street guest parking spaces (not associated with a specific residence). Water, sewer, electricity, and natural gas would be provided by the same purveyors as proposed under the original project. Subdivision improvements would require the removal of approximately 70 eucalyptus trees, which is less than the 80 trees that would require removal under the proposed project. These trees are not protected and do not require a permit for their removal. Although vertical construction is not proposed at this time, future residences would be restricted to a maximum height of 20 feet from average natural grade, which is less than the maximum allowable building height of 30 feet from average natural grade pursuant to the development standards within Title 21 section 21.12.060.

Site Access

Access to the project would be provided from the signalized intersection of River Road and Las Palmas Road to River Run Road, then Woodridge Court, which currently terminates at the project site boundary. River Road is a public road maintained by the County of Monterey. Las Palmas Road, River Run Road, and Woodridge Court are private roads maintained by the Las Palmas Homeowners Association (LPHOA). The project applicants, currently pay a monthly

road maintenance fee to the LPHOA. Pursuant to a future private agreement between the applicant and the LPHOA, the applicant would pay a proportionate share for the use of the roads based on construction impacts and operation of the facility. Although the subject property is adjacent to River Road, there is no direct access from River Road to the site, and none is proposed.

Land Use

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

The MDR district (Title 21 section 21.12.060.A) requires a minimum building site of 6,000 square feet, unless otherwise approved as part of a condominium, planned unit development or similar clustered residential subdivision. As described earlier, there are proposed lots under 6,000 square feet, but the lots have been clustered so that the development and roadways would be located within the center of the lot, leaving a buffer of open space areas. In addition, the project has been conditioned requiring rezoning of the property to include a B-6 overlay, which would prevent lots to be further subdivided. Further, the project is similar in design and density to the Las Palmas Ranch residential neighborhood to the east.

Development on Slopes in Excess of 25%

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

Design Review & Scenic Resources

The subject property is located within a Design Control overlay zoning district and is visible from a scenic-designated stretch of State Route (SR) 68 for approximately 3,000 feet (0.57 mile). The project site is adjacent to River Road but is minimally visible from this roadway, and the River Road/SR 68 intersection, due to existing topography and vegetation. The site is also visible from portions of Reservation Road and the Las Palmas Ranch subdivision. The LPRSP EIR, adopted by the County on September 20, 1983, anticipated that views from River Road would become more urbanized, and that development would be visible from scenic-designated SR 68. The LPRSP EIR established mitigation measures to reduce aesthetic impacts associated with development of the Las Palmas Ranch Specific Plan Area. Those measures, such as tree planting

and a River Road setback, are incorporated into the plans of the proposed project. Development of the project site, therefore, does not represent an aesthetic impact that has not previously been analyzed and found to be less than significant.

Environmental Review

As summarized in the cover staff report, a Draft Subsequent Environmental Impact Report (DSEIR) and a Final SEIR was in accordance with the California Environmentally Quality Act (CEQA) which addressed potential and unavoidable impacts of the proposed senior assisted living facility. Pursuant to CEQA Guidelines Section 15126.6, the DSEIR/FSEIR identified project alternatives and the required analysis. As directed by the Monterey County Board of Supervisors on October 12, 2021, the project scope was modified and an augmentation to the FSEIR was prepared to update the project objectives and include and analyze “Alternative 3b” – a residential subdivision for up to 30 residential lots. Although the project before the Commission includes 26 residential lot and an open space parcel, Alternative 3b analyzed up to 30 lots to ensure adequate environmental analysis if it were to be feasible to construct 4 inclusionary housing units onsite (see the *Affordable Housing* discussion in the cover staff report). Together, the Augmentation and the FSEIR, concludes that Alternative 3b would result in less environmental impacts than the senior living facility project and would meet most of the objectives of the proposed project and was therefore chosen as the proposed project. No new impacts or mitigations have been identified for Alternative 3b.

Project Objectives

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

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

Aesthetics

Alternative 3b was found to have less significant impacts than the originally proposed project. The applicant proposes that future single family dwellings built onsite would not be taller than 20 feet high. To ensure the resulting lots would be subject to a 20 foot height restriction, a non-standard condition of approval has been incorporated requiring a rezone of the property to include the 20 foot height limitation. The eucalyptus trees retained on the western portion of the property under Alternative 3b are within the critical viewshed (see Toro Area Plan Policies T-1.7 and T-3.3). Although eucalyptus trees are not considered protected within Monterey County, the trees aid in shielding the potential development from the viewshed of SR 68, River Road, and Las Palmas #1. Similar to the senior living facility, Alternative 3b would potentially impact scenic vistas and the visual character of the site and would introduce new sources of light and glare to the project site and vicinity. However, implementation of identified Mitigation Measures AES-1, AES-2, AES-3, and AES-4, as well as the non-standard condition for the 20 foot height limit, potential aesthetic and viewshed impacts (from State Route 68 and other nearby public

viewing areas) would be reduced to less-than-significant.

Biological Resources

Potential biological impacts resulting from Alternative 3b would also be minimized due to the reduced development, compared to the senior assisted living facility which included a total of 190,000 square feet of coverage. The proposed subdivision encompasses approximately 160,000 square feet; with a maximum building site coverage of 35%, less than 60,000 square feet of the subdivision would be covered. This is significantly less than the originally proposed senior assisted living facility. Additionally, biological mitigation measures, including MM BIO-1 – MM BIO-6, have been incorporated to ensure pre-construction surveys for multiple special status species are conducted prior to construction.

Traffic

The updated traffic report determined that the proposed project would still result in an unavoidable significant impact to SR 68 as the roadway currently operates at a Level of Service “F”. However, the proposed subdivision would have fewer daily trips as estimated within the traffic report. The assisted senior living facility would have an estimated 362 daily trips opposed to the residential subdivision which would have an estimated 264 daily trips. Therefore, the unavoidable traffic impacts associated with Alternative 3b would be less than the originally proposed senior living facility. Similarly, greenhouse gas emissions would be reduced as well as impacts to air quality due to the proposed project encompassing less area and providing housing for fewer people. Implementation of traffic mitigation measures (MM TRA-1 and MM TRA-2) included in the FSEIR prepared for the senior living facility would reduce overall traffic trips and during peak traffic hours resulting from employee travel to and from the facility. These mitigations require implementation of a shuttle service plan and a specific employee schedule to ensure shift changes are not during peak traffic hours. Alternative 3b would not be an employee intensive use and these mitigations would not be applicable in this case. Therefore, they have been removed from the proposed conditions of approval.