

Exhibit B

This page intentionally left blank.

DISCUSSION

The proposed project, the conversion of an Office and storage area operation into a Mini-storage facility is located within a previously disturbed 7.429 acre site that has housed a similar mixed commercial use. The Property is zoned "HC" or Heavy Commercial and is bisected by two Area Plans where 0.35 acre located in the Toro Area Plan and the remaining 7 acres is in the Greater Salinas Area Plan.

Consistency with Applicable Regulations

The ~~0.35 acre~~ floodway portion of the parcel is subject to the Toro Area Plan. No development is proposed in this floodway and therefore is consistent with this area plan. The rest of the parcel is subject to the Greater Salinas Area Plan that provides policy GS-1.5 for regulating commercial land uses along the Salinas River and near Highway 68. Proposed development is characterized as general commercial and would neither harm riparian habitat nor further deteriorate water quality in the Salinas River. Therefore, implementation of the proposed project is found consistent with the Greater Salinas Area Plan.

Pursuant to Chapter 21.20.060.C and R, of Monterey County Zoning Ordinance (Title 21), mini storage facilities over 5,000 square feet requires a Use Permit.

Potential Environmental Impacts

Less Than Significant Impact

During the process of the Initial Study, Less Than Significant impacts have been identified for the following resources: Air Quality, Biological Resources, Geology/Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Population/Housing, and Utilities/Service Systems. Implementation of the project would incorporate conditions of approval to assure compliance with County requirements to the extent that they reduce the identified potential impacts. Therefore, mitigations were not necessary for the project to have a less than significant impact on these resources.

Air Quality

Potential impacts on Air Quality are reduced to Less Than Significant with implementation of Monterey County Code (MCC) Chapter 16.12 standard conditions for erosion control.

Biological Resources

Implementation of the proposed project would not have direct adverse effect on any riparian habitat or other sensitive natural community. Downstream impacts on U. S. Fish and Wildlife Service (USFWS) Salinas River National Wildlife Refuge would be reduced to less than significant impact through implementation of a condition of requiring submittal of an approved drainage plan. Therefore, implementation of the proposed project would have a less than significant impact on the USFWS SRNWR.

Geology / Soils

The Geotechnical Report recommends structural design of any building on the parcel account for a 7.0 magnitude earthquake. In addition, the Geotechnical Report includes seismic design criteria for foundation systems and building slabs. The Geotechnical report also describes results of percolation tests at the nearby analyzed properties as suitable to adequately support the use of an OWTS. Additionally, recommendations for managing effluent to the drainfield are made in order

DISCUSSION

to maximize longevity and usefulness of the system.

Greenhouse Gases

The applicant provided a “Trip Generation Analysis” prepared by Hexagon Transportation Consultants, Inc. on 30 March 2017. This report estimates that the currently proposed project would generate 77 fewer trips per day than those generated by the former tenant uses and operations. Therefore, the proposed project would result in reduction of traffic-generated emissions and thus, less than significant impact caused by GHGs.

Hydrology and Water Quality

Spreckels Lane Water System (WS) #3, the water source for this property, draws water from the 180/400-foot Aquifer (Pressure Subbasin) of the Salinas Valley Groundwater Basin. The new well must be tested for ability to meet daily demand. If tests do not meet maximum daily demand requirement, then additional storage shall be required. If additional storage is required, the applicant shall submit engineered plans for a water system storage upgrade that may include a pressure system. Another condition regarding water quality is that the new well undergo one year of quarterly sampling for Maximum Contaminate Level (MCL) of Nitrates due to initial test results that approached the MCL threshold for Nitrates. If water samples reach or exceed MCL thresholds, then a treatment system shall be required and approved by EHB.

Drainage to Salinas River is regulated by Regional Water Quality Control Board (RWQCB). The applicant must enroll with RWQCB for a Waste Discharge Identification number (WDID) that is submitted to EHB before building or grading permit approval. Therefore, implementation of the proposed project, as conditioned, would result in less than significant impacts caused by stormwater runoff.

The proposed project no longer includes construction of residential studio apartments and the current project description follows with the land use change in **bold**:

.Combined Development Permit consisting of: 1) General Development Plan (Operational Plan); 2) Use Permit for the establishment of a mini storage facility; 3) Use Permit to allow **conversion of existing two-story office building into one office and seven storage units on the first floor, and one two-bedroom apartment (relocation of an existing Caretaker's Unit) and eight storage units on the second floor**; and 4) Administrative Permit for a small water system.

The current scope of work no longer includes conversion of the second story office space to nine studio apartments. Therefore, the water use would be even lower than calculated for the previous project description.

The Balance report calculates the post-project water use of the currently proposed project would be 0.90 afy which would be a net reduction in water use of 2.25 afy ($3.15 - 0.9 = 2.25$).

Population / Housing

There is less than significant impact on population and housing from implementation of the currently proposed project due to the elimination of housing from the project description.

DISCUSSION

Utilities / Service Systems

Elimination of residential use (with the exception of replacing the caretaker's unit) and of the portable toilet service on the parcel reduces demand on utilities and service systems, especially that of water.

Public Response to Previous Project Description

Previous Project Description

The previous project description is as follows with the obsolete part of the description in **bold**:

Combined Development Permit consisting of: 1) Use Permit for the establishment of a mini storage facility; 2) **Use Permit to allow the conversion of existing second story offices to residential units**; 3) Administrative Permit for a small water system; and 4) General Development Plan.

The previous scope of work included conversion of the second story of an existing two-story building to one office and nine studio apartments which would have introduced residential use on the parcel. A mix of residential use in a commercial use zone is consistent with both the Land Use Element and the Housing Element of the *Monterey County 2010 General Plan*

Public Comment: Water

Comments were received that raised concerns about water use increase for the parcel. The Spreckels Lane Water System (WS) #3, the water source for this property, draws water from the 180/400-foot Aquifer (Pressure Subbasin) of the Salinas Valley Groundwater Basin, which has experienced groundwater depletion and significant seawater intrusion.

The proposed project, as conditioned by Bureau of Environmental Health (EHB), Water Resources Agency (WRA), and RMA-Environmental Services (ES) would have minimized impacts to Hydrology and Water Quality in the areas of ground water, drainage patterns, runoff, water quality, flood hazard, and flood flows (Initial Study, 18 January 2017, pp. 25-27, 36).

A public response included a Technical Memorandum prepared by Parker Groundwater (Parker, Timothy K., 8 February 2017) that estimated existing water use at 0.96 acre-feet per year (afy) using standard usage rate data for 9,800 square feet office space and a two bedroom caretaker unit. The Parker memo estimated post-project water use at 2.32 afy using typical water usage rates for studio apartment residences, office space, and self-storage unit sector averages.

The applicant submitted a response to the Parker memo, prepared by Balance Hydrologics, Inc., that provided analysis considering water use associated with the same aforementioned land uses along with those related to the contractor yard. The United Site Services (USS) is a portable toilet service/storage facility that occupied 1.7 acres of the subject parcel 2002-2016. Using an algorithm that entailed calculations from electric meter readings and water meter readings across variable time periods, the Balance report estimated the existing water use on the parcel closer to 3.15 afy. The difference in pre-project and post-project water use would then be a net reduction in water use of 0.83 afy ($3.15 - 2.32 = 0.83$).

Staff Response to Public Comment on Water

See above under *Hydrology and Water Quality*.

DISCUSSION

Public Comment: Traffic

Comments were received that raised concerns about traffic on Highway 68. The parcel location is approximately half a mile from Hwy 68, with on- and off-ramps approximately one quarter mile away. The level of service is rated “F” for traffic along most segments of Hwy 68, west of Toro Regional Park.

The previous scope of work was estimated to generate approximately five additional traffic trips per day (Taluban Engineering, Inc., 8 Sep 2014, “Potential Traffic Trips vs. Existing Traffic Trips,”). Taluban Engineering, Inc. provided an addendum to the report qualifying the traffic trip increase as not impacting the Hwy 68 or Reservation Road corridors (Taluban, 27 Jan 2017). This addendum further characterized the customer demographic of this mini-storage facility as residents of Salinas, Chualar, Gonzales, Soledad, and Greenfield, all of whom would approach the facility from Hwy 68, east of Toro Regional Park.

Staff Response to Public Comment on Traffic

County of Monterey RMA-Public Works reviewed the report and addendum by Taluban, and concurred with the analysis and results of each, respectively.

Current Project Description: Traffic Study

See above under *Greenhouse Gases*.

Public Comment: Referral to Toro Land Use Advisory Committee

A comment was received that raised concerns about the project not going to the Toro Land Use Advisory Committee despite the fact that a portion of the parcel is within the Toro Land Use Plan.

Staff Response to Public Comment on Referral to Toro Land Use Advisory Committee

Development for proposed project is located on the portion of the parcel zoned Heavy Commercial and where the appropriate community advisory body to review this project is the Spreckels Neighborhood Design Review Committee (NDRC). (See Exhibit C – Zoning of Parcel at 14 Spreckels Lane, Salinas). The project was referred to the Spreckels (NDRC) for review. Based on the LUAC Procedure guidelines adopted by the Monterey County Board of Supervisors, this application warranted referral to the LUAC because it requires a CEQA review.

A portion of the subject parcel is zoned Farmland, where there is no development. Therefore, it was determined the Toro LUAC would not be the appropriate community advisory body to review this project proposal.

Public Comment: Monterey Bay Area Resources District (MBARD)

Recommendations from MBARD are as follows:

- Analyze potential air quality impacts compared to significance thresholds as identified in the MBARD 2008 CEQA Guidelines.
- Include quantitative analysis of potential greenhouse gas emissions using thresholds adopted by MBARD or the San Luis Obispo Air Pollution Control District.

DISCUSSION

- Utilize California Emission Estimator Model (CalEEMod) for determining emissions of both particulates and greenhouse gases.
- Consider that demolition and/or renovation of existing buildings may be subject to two MBARD rules. These are 1) Rule 424: contains investigation and reporting requirements for asbestos, including required notification to MBARD at least ten days prior to renovation or demolition activities; and 2) Rule 439: prohibits release of any visible emissions from building removals.
- Identify whether any new stationary sources would be part of the proposed project and determine if an operational permit is required from MBARD.
- Utilize construction equipment with lower emissions such as that which conforms to California Air Resources Board (CARB) Tier 3 or Tier 4 emissions standards. Whenever feasible, utilize construction equipment that operates with alternative fuels such as compressed natural gas (CNG), propane, electricity, or biodiesel.

Staff Response to Public Comment from MBARD

Implementation of the project would result in temporary impacts resulting from construction and grading activities that require fuel combustion of construction vehicles, a primary source of GHG precursors, NO_x and ROG. Typical construction equipment would be used for the project and ROG and NO_x emitted from that equipment have been accommodated within the MBARD 2008 *Air Quality Management Plan for the Monterey Bay Region (AQMP)*.

See above under *Air Quality*.

See Conditions #5 and #6 (Exhibit C) for MBARD Rule 424 and Rule 439 as placed on this development project for compliance.

The recommendation to use construction equipment with lower emissions has been noted.

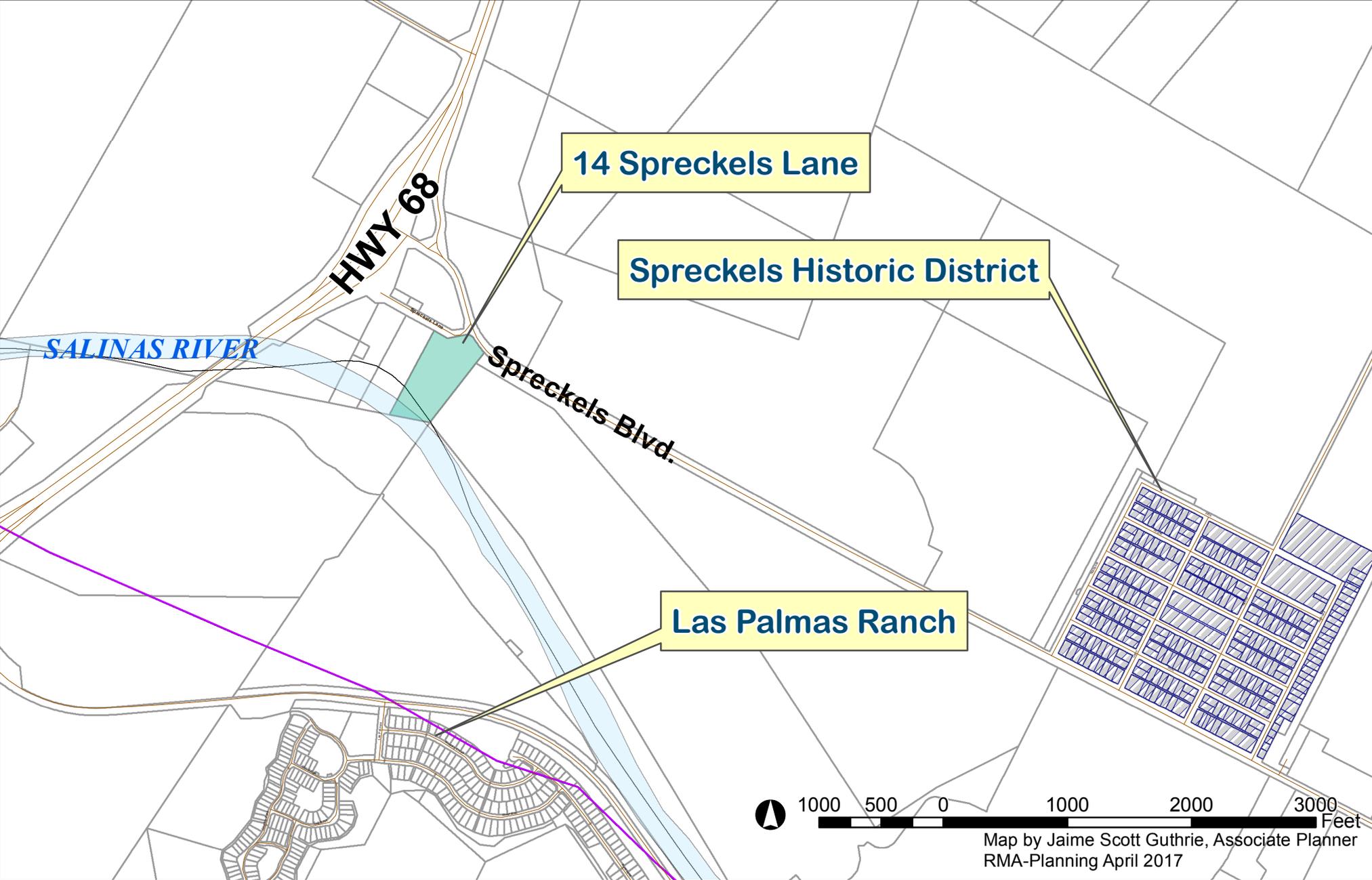
Public Comment: Monterey County 2010 General Plan Policy LU 1.19

Policy LU 1.19 establishes the intention to develop a “Development Evaluation System (DES)” for development outside Community Areas, Rural Centers, and Affordable Housing Overlay districts that are five or more lots or units and those of equivalent or greater traffic, water, or wastewater intensity. The previous project description included 10 studio apartments (including replacement of the existing caretaker’s unit). Pursuant to Policy LU1.19, the project would have been subject to evaluation using the DES. The current project description is not subject to evaluation through the DES

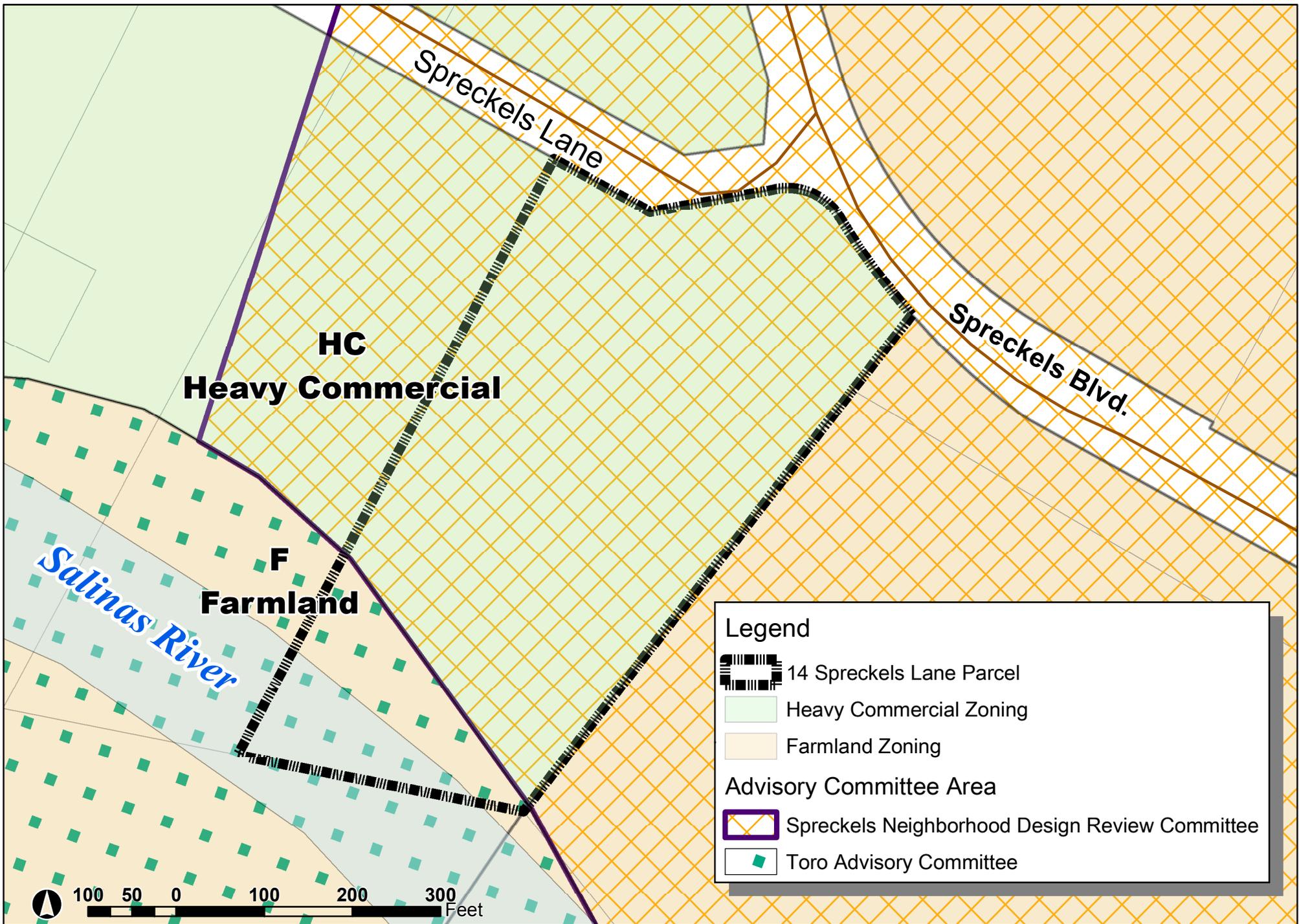
Context Map of 14 Spreckels Lane

County of Monterey

EXHIBIT B



Map by Jaime Scott Guthrie, Associate Planner
RMA-Planning April 2017



Zoning of Parcel at 14 Spreckels Lane, Salinas
County of Monterey

EXHIBIT B
 Map by Jaime Scott Guthrie, Associate Planner
 RMA-Planning April 2017

This page intentionally left blank