Exhibit A

This page intentionally left blank.

EXHIBIT A
DISCUSSION

Design

Carmel Valley Master Plan Policy CV-1.1 requires that development follow a rural architectural theme to preserve the rural character of Carmel Valley. Policy CV-1.20 of the Carmel Valley Master Plan requires that materials and colors be consistent with the rural character of the valley and be compatible and appropriate for the immediate surrounding area. Consistent with these policies, the project would incorporate three architectural styles (Spanish Colonial, Transitional, and Traditional), with colors and materials consisting of earth-tone colors and materials that are complementary to the area (see **Figure 1** and **Exhibit B2**). The Applicant curated these three architectural styles by cataloging and identifying key architectural elements found in existing development in the surrounding areas (Monterey, Carmel Valley & Carmel-by-the-Sea):

- The proposed Spanish Colonial design would have low-pitched gabled roofs, stucco exterior walls with limited masonry, symmetrical windows, and simple massing forms. A beige exterior stucco color is proposed, with dark or light brown trim options. The architectural style is found throughout Carmel Valley and is very prominent in the City of Carmel-by-the-Sea. This design reflects the area's rural architectural theme and is comparable to existing development in the area.

- The proposed Transitional architectural style is meant to represent a thoughtful evolution of architectural styles found throughout Monterey Peninsula and Carmel Valley. The Applicant described this style as "blending traditional and modern elements into a classic and contemporary adaptation of an architectural style creates homes that are [rooted] in Carmel Valley's rural heritage and response to modern living." The proposed design would incorporate steeper-pitched roofs with composite shingles, stucco exterior walls with stone accents, and simple massing forms. A gray exterior stucco color is proposed, with light brown or beige/ivory trim options. Examples of this architectural style can be found throughout Carmel Valley. This design reflects the area's rural architectural theme, which helps to preserve the rural character of Carmel Valley.

- The proposed Traditional architectural style is a blend of the area's bungalow and craftsman style residences. These architectural traditions are rooted in early 20th-century coastal development and reflect a philosophy of craftsmanship, natural materials, and human-scale design. The proposed design would include low and steep-pitched gable roofs with weathered wood shingles, covered porches, and simple massing forms. A gray exterior stucco/board and batten is proposed, with dark blue/gray or white trim options. This design reflects the area's rural architectural theme and is comparable to existing development in the area.

These architectural styles, as well as the four proposed floor plans for the single-family dwellings and two floor plans for the townhomes, make up the project's proposed Pattern & Design Book. Approval of this Pattern & Design Book would serve as a blanket Design Approval over the subject subdivision and allow the proposed single-family dwellings and townhomes to be constructed without individual Design Approvals. As conditioned, a Homeowners Association will be created and will be required to enforce the Pattern & Design Book's guidelines. Exterior lighting (residential structures) and street lighting requirements would also be incorporated into the Pattern & Design Book, and enforced by the HOA. Compliance with the Pattern & Design

Book would mirror the requirements of General Plan Policy LU-1.13 which requires that exterior lighting (street lighting and residential development) is downlight, and all roof-mounted solar panels have a non-reflective coating or other appropriate design to reduce glare. Landscaping on private residential lots and within open spaces would be enforced by the HOA through the creation of a Master Landscape Guideline book. This would ensure that areas are appropriately landscaped, water-efficient measures are implemented, and no invasive species are introduced that would disturb the surrounding environment.

Figure 1. Proposed colors and materials; conceptual streetscape.

Visual Resources

Within the Carmel Valley Master Plan, Carmel Valley Road and Laureles Grade are recognized as a scenic corridor, and those views of the Carmel River, or the distant hills as seen from key public viewing areas such as Garland Ranch Regional Park, are protected (CVMP Policy CV-3.3). The proposed development would be visible from the intersection of SR-1 and Carmel Valley Road, but all views of the development would be distant and subordinate to the surrounding commercial and developed character of this intersection. The project site is located 0.2 miles south of Carmel Valley Road. Views of the project site from Carmel Valley Road are heavily screened by existing vegetation along the corridor (see **Figure 2**). The proposed project would introduce 74 units (all structures are 30 feet tall). The proposed development may be visible for limited instances along a 500-foot segment of Carmel Valley Road, but would be filtered by existing vegetation and would not block views of the Carmel River or the distant hills. The proposed structures' ridgelines would be at or below the surrounding tree canopies. No hillsides will be modified (CVMP Policy CV-3.4). Due to distance, the proposed development would not be visible from Laureles Grade Road, or Garland Ranch Regional Park.

The project site is not visible from the northern extent of Palo Corona Regional Park due to intervening vegetation; however, construction of the proposed development would be visible along a 0.2-mile stretch of an internal hiking trail due to minimal changes in elevation and the height of the structures. From this vantage point, two-story commercial developments along Carmel Rancho Boulevard and low-density residential development are distantly visible and heavily screened by intervening vegetation. From this vantage point, the introduction of two-story residential development and associated site improvements would not substantially degrade

the semi-rural, vegetated viewshed, as the development would be complementary and consistent in height, bulk, and mass with surrounding development. Additionally, the project site is visible from the park's first ridge/mountain, known as Inspiration Point (0.8 miles south) (see **Exhibit F**). From Inspiration Point, which is recognized by the Monterey County Regional Park District as a vista for the express purpose of hiking, viewing, and sightseeing, the project site is entirely visible, and thus the proposed development would also be distantly visible from Inspiration Point. Due to the elevation change of approximately 600 feet, only limited portions of the proposed southern facades and the roofs would be visible. Further, at 0.8 miles south of the project site, the proposed development's scale would appear much smaller due to distance and elevation change.

As proposed, the project complies with the 2010 General Plan and Carmel Valley Master Plan's policies regarding protection of visible hillsides and viewsheds from scenic corridors. As described above, the proposed colors and materials will aid in the development by being less visually intrusive when visible.

Figure 2. View of project site from Carmel Valley Road.

Inclusionary Housing

The Project is required to comply with the Inclusionary Housing Ordinance requirement to provide a minimum of 20% affordable housing units (Monterey County Code Chapter 18.40). The project proposes more than five units and, therefore, may provide the required inclusionary units on-site or off-site. As proposed, the project includes 15 on-site affordable units (townhomes), which will be deed-restricted to low-income individuals. This is consistent with the County's Inclusionary Housing requirements and Builder Remedy inclusionary housing requirements. The affordable townhome units will be located on Lot 60 and will be managed by the HOA. HCD-Housing has reviewed the proposed inclusionary housing and added one condition of approval, which requires an Inclusionary Housing Agreement.

State Density Bonus Law

State Density Bonus Law (SDBL) (Gov. Code § 65915, *et seq*.) created a mechanism to obtain more favorable development requirements for projects with affordable or senior units. To meet the affordable housing goals, developers are entitled to a density bonus that corresponds to specified percentages of units set aside for very-low, low, or moderate-income households. In addition to the density bonus, SDBL provides three additional benefits for qualifying projects:

1. One or more concessions/incentives that provide cost reductions for the development. Under the law, a concession includes a reduction in site development standards and/or regulations when such regulations potentially make the project economically infeasible for the developer to build. These can include a reduction in site development standards or modification of zoning or architectural design requirements that exceed minimum building standards. The number of allowed concessions/incentives is determined on a sliding scale based on the percentage of units that will be set aside as affordable units and the household income category of those affordable units.

   Concessions/incentives may only be denied if the County has substantial evidence that the concession/incentive would be contrary to state or federal law; does not result in identifiable and actual cost reductions; or would have a "specific, adverse impact" on public health and safety; or on property listed in the California Register, based on objective standards, which cannot be mitigated. "Objective" standards must be verifiable by reference to an external and uniform benchmark.

2. Waivers are reductions or modifications of any development standards and other regulations that would physically preclude the development of a project at the density permitted and with the allowed incentives or concessions. Development standards include, but are not limited to, height limitations, setback requirements, site coverage, open space requirements, or parking requirements that apply to a residential development pursuant to any ordinance, general plan element, policy, resolution, or regulation. There is no limit on the number of waivers an applicant can request through SDBL.

   Grounds for the denial of a requested waiver are limited to: the requested waiver would have a specific, adverse impact on health or safety that cannot be mitigated; would be contrary to state or federal law; or would have an adverse impact on property listed in the California Register of Historic Resources.

3. Reductions in parking requirements, provided based on the number of bedrooms in each unit and the type of project.

Here, by deed restricting 20% of the proposed units BMR, the project is eligible for three concessions/incentives and an unlimited number of waivers. The applicant submitted a letter requesting a concession to the County's requirement that affordable units provide a similar number of bedrooms as the market rate units (**Exhibit G**). The requested waivers are to reduce the required minimum building site, density maximum, and building site coverage. In this case, staff has determined that the concession is not needed to find the project consistent with

applicable County Code, and supports the granting of three waivers to modify specific site development standards.

- *Similar Bedroom Count:* Monterey County Code section 18.40.070.B(3) requires that on-site inclusionary housing units contain a "similar" number of bedrooms as the market rate development, with "total square footages suitable for the number of bedrooms". The proposed affordable townhomes will consist of two and three-bedroom units, while the market rate single-family dwellings will have 4 and 5 bedrooms. The Applicant's concession request letter identifies that the proposed clustering of the affordable units and at their sizes allows for the project to maintain its overall density. The Applicant's justification for this concession also finds that the current bedroom count and size result in an identifiable and actual cost reduction. Put simply, increasing the number of bedrooms for the affordable units would increase the cost per square foot and could render such units' construction economically infeasible.

  After a conversation with the HCD-Director and Housing Program Manager, HCD staff reviewed the requested concession and determined that it is not required to satisfy Monterey County Code section 18.40.070.B(3). Two- and three-bedroom affordable housing units are favorable in the Monterey County and, in this case, will provide meaningful housing to low-income households and individuals. While the affordable unit's bedroom count is not the same as the market rate residence's bedroom count, County Code does not require like-for-life, only similar. Here, two- and three-bedroom affordable housing units will likely be occupied by the same number of individuals and/or household members as a four-to-five-bedroom residence. The proposed townhome's bedroom count will provide more meaningful, affordable housing than one-bedroom or studio alternatives. The proposed sizes of the affordable townhomes are suitable for two- and three-bedroom units. Therefore, staff recommends the Planning Commission agree that 1) the two- to three-bedroom affordable townhome units are proportionally similar to four- to five-bedroom market-rate single-family dwellings; 2) the proposed unit mix (nine three-bedroom and six two-bedroom units) is acceptable; and 3) meets the intent of Monterey County Code section 18.40.070.B(3), which is to provide affordable units for a range of household sizes (e.g., 2-person households, multigenerational households, households with children, etc.).

  The affordable townhomes will not be discernible from those of the market rate units with regard to finishes and architectural elements, as required by Monterey County Code section 18.40.070.B(2). The affordable units will have access to the project's parks, roadways, etc. Therefore, staff believes the requested concession is not required, and the County is not required to determine whether it will not have a specific, adverse impact on public health and safety, or be contrary to state or federal law.

- *Minimum Building Site, Density Maximum, and Building Site Coverage:* The Low-Density Residential Zoning District requires lots to be 1-acre, unless a part of a clustered development, which allows 0.5-acre lots, and to have a maximum development density of 1 unit per acre. Further, LDR zoned lots are limited to 35% building site coverage. Here, the project proposes a minimum lot size of 5,000 square feet (0.11 acres), rather than the

required 1-acre minimum, with an overall density of 5.92 dwelling units per acre. If required to provide the 1-acre per building site would physically preclude the construction of the proposed number of lots (60), as the underlying zone would only allow 12 lots. Similarly, requiring 1 unit per acre density would physically preclude the proposed density or number of units (74 units on 12.5 acres = 5.92DU/A), as only 12 units would be allowed on the 12.5-acre lot. Further, as a Builder's Remedy project, the County cannot reduce the proposed density. While a waiver is not required to modify the underlying density, staff recognizes the applicant's request for such a waiver. Therefore, staff recommends the Planning Commission grant these two waivers (density and lot site).

Additionally, while the proposed smaller single-family dwellings (2,790 square feet) may comply with 35% site coverage, the proposed larger residences (up to 3,920 square feet) may exceed allowable coverage, up to 56%. The proposed townhomes will have a building site coverage of 40%. Overall, all proposed developments will result in a site coverage of 31%. Complying with the required site coverage (35%) would require each lot size to increase in size. This would thereby physically preclude the construction of housing units and the project as designed because the number of lots would need to be decreased. Similarly, decreasing the size of townhomes and residences to comply with the 35% site coverage limitation could render the project economically infeasible. Strict application of the zoning district's site development standards would preclude the density and scale of the proposed project. There is no feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the development unaffordable to very low, low, and moderate income households. Therefore, the staff recommends that the Planning Commission grant the requested site coverage waiver.

Subdivision

As outlined in the attached resolution, the project meets all required findings of the Subdivision Map Act and Title 19 of the Monterey County Code (subdivision ordinance). All necessary facilities, including sewage and water services, will be provided and the site has been determined by staff to be suitable for the proposed development with incorporated mitigation measures.

Site Development Standards

As discussed above, the applicant has requested the granting of three waivers to find the proposed development (single-family dwellings and townhomes) compliant with the required density, site coverage, and lot size requirements. The project is consistent with all other required development standards in the LDR zoning district. Pursuant to Title 21 section 21.14.060, main structures are limited to 30 feet in height and shall have setbacks of 30 feet (front), 10% of the lot's width to a maximum of 20 feet (side), and 20 feet (rear), unless within an approved building envelope. As shown on the attached plans (also see **Figure 3**), the proposed townhomes and single-family dwellings will have heights of 30 feet and will be located within the proposed VTM's building envelopes. As proposed, typical setbacks will be 6 feet for the front (except for 20 feet on Lots 1, 39, 51, and 59), 5 feet for the side (except 10 feet on Lots 29, 29, and 59), and 10 feet for the rear. The project will provide 307 parking stalls (garages, driveways, and on-street guest parking), which exceeds the required number of parking stalls per Chapter 21.58.

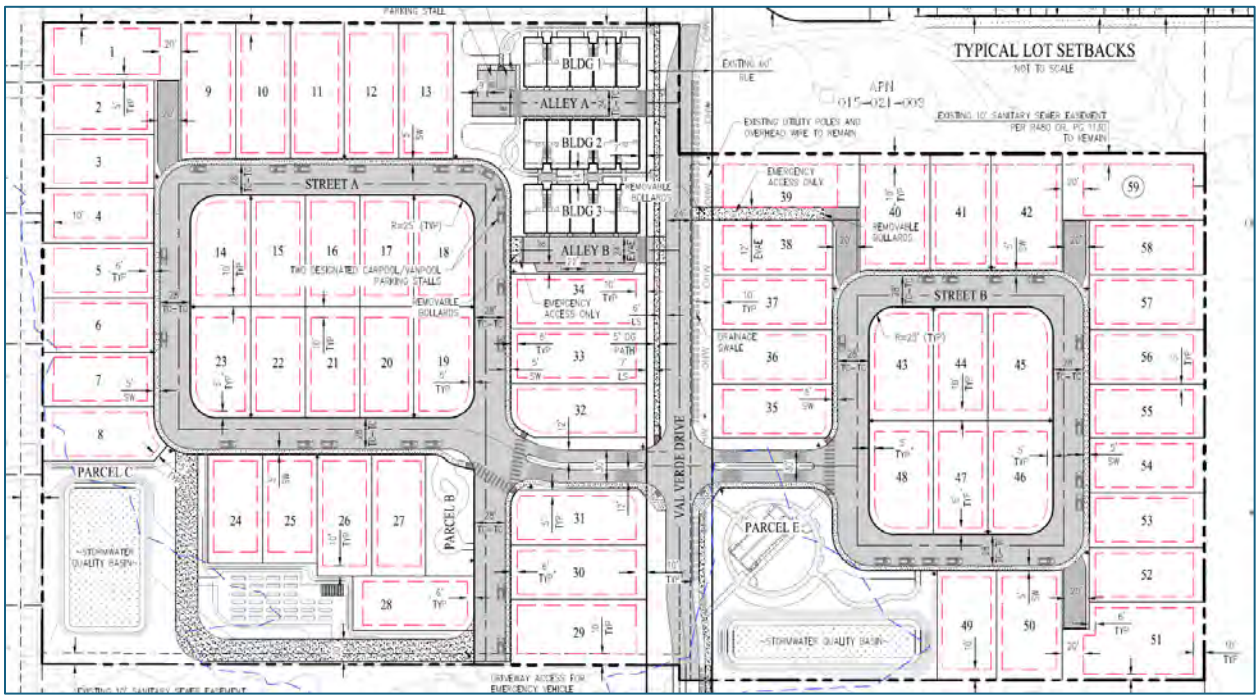

Figure 3. Proposed subdivision layout, building envelopes, on-site improvements, etc.

Surface Water & Flood Control

Local drainages contribute to the Lower Carmel River/Lagoon Sub-Watershed of the Carmel River. The Carmel River passes approximately 1,100 feet south of the southern boundary of the project site. There are no drainages defined in the National Hydrography Dataset that cross the project site, and a review of recent aerial imagery did not reveal the presence of any defined channels or riparian areas. However, the site and surrounding areas are known to be exposed to flood risks from two distinct flooding sources:

1) overbank flows from the Carmel River (FEMA floodplain); and
2) overland flows from the current downstream end of the relatively large north bank tributary known as County Drainage Area 27 (DA-27).

As described below under *Development Within the Carmel River Floodplain*, the project has demonstrated consistency with Carmel Valley Floodplain regulations, and residential development will be safe from Carmel River flooding and FEMA Special Hazard Areas.

Flooding issues resulting from DA-27 are known to exist in this area. Flooding associated with DA-27 generally flows in a southwesterly direction across the project site towards the Carmel River. This runoff originates in the foothills of the valley wall north of the Carmel River. Flow paths within DA-27 are well-defined in the steep canyons north of Carmel Valley Road, but essentially disappear on the south side of the road, where a small ditch carries flow for a short distance before ending at a point approximately 700 feet north of the project site. The overland flow modeling presented in the County's County Service Area 50 Final Lower Carmel River Stormwater Management and Flood Control Report (CSA-50 Report) shows that much of the runoff originating in DA-27 would flow south and west to cross Val Verde Drive at the Project

site, towards the Barnyard, Rio Road, and Carmel Rancho Boulevard. The modeling shows that as much as 46 acre-feet could enter CSA-50 from DA-27, and much of this would be overland flow through the site. Ponding, or flooding, depths of a 100-year event were modeled to be between 0.5 feet and 6 feet throughout various areas of CSA 50's boundary (see **Figure 4**).

Figure 4. CSA-50 Report illustrating ponding/flooding depths through the CSA area. Project site shown in red.

The extent of and potential solutions to the DA-27 flooding were studied in the County's CSA-50 Report. Recommended options to address flooding associated with DA-27 include the construction of perimeter protection (levees) and conveyance of DA-27 runoff via pipeline or drainage ditch from Carmel River to the Carmel River.

CSA-50 is actively collecting fees from affected property owners to help fund drainage improvements. The subject property owner pays approximately $36 per month into CSA-50 through tax assessments. None of the improvements recommended in the CSA-50 report have been installed as of date. However, the adjacent property (Rancho Canada Subdivision Project) is currently in the process of installing an 84-inch stormwater pipe along its western property line. This stormwater pipe is adequately sized to receive and distribute all runoff from DA-27 to the Carmel River, but it will only be installed for the length of the property. Therefore, although this pipe is expected to be installed in the summer of 2026, it is not connected to the runoff outlets at Carmel Valley Road. Accordingly, it will not properly function without a pipe being installed between it and Carmel Valley Road. The County may construct a connecting pipe, but capital improvement plans, funding sources, timelines, etc., have not been approved, and therefore, reliance on a future, potential pipe would be inappropriate to demonstrate compliance with Title 16 requirements.

Therefore, the project's hydrologists analyzed overland flooding impacts under current conditions. As modeled in the CSA-50 report, the eastern portion of Val Verde Drive within the project site would be inundated by up to 1 foot in 100-year storm events. The western half of the property would be primarily inundated by up to 0.5 feet, but as high as 1 foot on the western

property line. Limited portions of the eastern half of the project site are anticipated to be affected by 100-year storm events (up to 0.5 feet).

Compliance Flood Control Provisions

Title 16 section 16.16.050 establishes provisions for flood hazard reduction. Title 16 requires that the project ensure that the proposed development "will not significantly reduce the capacity of existing rivers or watercourses or otherwise adversely affect any other properties by increasing stream velocities or depths, or diverting the flow." Section 16.16.050.C requires that new construction be elevated at least one foot above base flood elevations. Although the project proposes on-site stormwater control measures to maintain on-site drainage/run off, as required by County Code, these improvements are not sized or intended to address the overland flows (surface water) that may impact the project site during 100-year storm events. In accordance with Title 16 section 16.16.050.C, the proposed finished floor of the residential lots anticipated to be inundated by overland flows (up to 1 foot) would be elevated over one foot above the modeled ponding depths. This is accomplished by leveling the project site and slightly elevating the western half of the site by 1-3 feet. Finished floors of the proposed residential development will add another 10-12 inches of freeboard. Although not subject to major flooding, the eastern half of the project site will be raised 0.1 to 2.5 feet. Therefore, as designed, the proposed residential development will not be subject to surface water flooding of DA-27 and is consistent with Title 16 section 16.16.050.C.

Flooding associated with DA-27 is known within the project site and the surrounding areas. Although the site, as proposed, would be safe from modeled inundation by raising it above projected ponding depths, nearby properties may be affected by increased velocities or depths. By raising the site, as discussed above, the overland flows that would otherwise occupy the site would be displaced elsewhere, thereby increasing the flooding or ponding depths of nearby properties, specifically those to the north.

Compliance with Title 16 requires that the project ensure that the proposed development "will not significantly…affect any other properties by increasing stream velocities or depths, or diverting the flow." Therefore, additional drainage on-site improvements are needed to manage and reduce impacts from overland flows of DA-27 that may result in increased off-site flooding depths. County staff discussed other alternatives with PWF&P to help alleviate stormwater runoff from DA-27. Other alternatives include off-site improvements or payment of fair share contributions for future drainage improvements. However, given constraints that are not in control of the Applicant/Owner (e.g, rights of entry, funding, timing, etc.), staff has determined that on-site improvements are the only viable option at this time.

Therefore, as conditioned, the project would be required to install on-site drainage improvements that would allow DA-27 runoff to be received on-site, rather than displaced elsewhere, but in a controlled manner (Condition No. 24). The site would be improved through fine grading, drainage pipes, and/or other measures to collect runoff along the northern property lines and direct the runoff south within the proposed street rights-of-way or within controlled drainage improvements throughout the property. The drainage improvements would be sized to accommodate the projected volumes of overland water, while still ensuring that all properties (on- and off-site) have safe access to nearby roads. The captured or conveyed runoff would then continue in its current flow pattern (southwest) or may be redirected to nearby public (County)

stormwater drainage improvements. Improvements would be constructed concurrently with subdivision improvements (grading, utilities, roads, etc.). However, should an alternative improvement option be made available prior to final map approval, such as the County's conveyance pipe becoming an actual project, the Applicant/Owner may utilize or contribute to such an improvement, subject to PWF&P approval.

To ensure compliance with Title 16 requirements, Condition No. 24 has been applied. This condition requires that the project ensures that DA-27 run on received on-site is routed through the subject property or otherwise controlled in a manner that ensures 1) on-site habitable structures are safe from overland floods, and 2) off-site properties are not adversely impacted or subject to increased overland flooding depths during 20-year and 100-year storm events, as demonstrated by a hydrology and hydraulic analysis, capacity assessments, and/or other appropriate documentation, prepared by a licensed civil engineer.. Per this condition, the following would occur:

1) The Applicant/Owner shall construct on-site drainage improvements throughout the property to necessary to meet the performance standard above, subject to PWFP review and approval, or other improvement alternatives determined appropriate by the Director of PWFP that are equally or more effective, and better address DA-27's overland flow issues and the goals, policies, and text of the 2010 General Plan and Monterey County Code. Required improvements shall be roughly proportional to the project's impact on overland flows and shall not require addressing pre-existing deficiencies. Required improvements shall be shown on the final map and constructed concurrently with subdivision improvements.
2) However, if the County (including CSA-50) confirms that the drainage conveyance pipe connecting DA-27 to the Carmel River is an actual, planned project (funded, permitted, and scheduled to be completed prior to inspection of subdivision improvements), the Applicant/Owner shall pay a fair-share contribution toward the construction of that improvement, as determined by PWFP, prior to approval of the final map.

Staff recognizes the severity of flooding issues in this area, which were also raised at the LUAC meeting. The above condition and conceptually described on-site improvements would address overland floods in the area, but would not resolve the area's issue. Completely resolving the area's flooding issues is not the responsibility of the property project. However, it is required that the project demonstrate that off-site flooding impacts are not worsened. Accordingly, by capturing, controlling, and directing (or redirecting) DA-27 overland flows, rather than displacing those flows, would ensure that off-site ponding depths are not in excess of current modeling conditions. With implementation of this condition, and as designed, staff believes that the project complies with the County's flood hazard provisions. The occupants of the proposed project will not be subject to either Carmel River flooding or DA-27 overland floods. Furthermore, implementation of the project, as conditioned, will not significantly reduce the capacity of existing rivers or watercourses or otherwise adversely affect any other properties by increasing stream velocities or depths, or diverting the flow.

Development Within the Carmel River Floodplain

Pursuant to Title 21 section 21.64.130.D.2, development within Carmel Valley floodplain is permissible, provided that all structures, including related utilities, shall be so located and

constructed so as to minimize or eliminate infiltration of flood waters into the systems and discharges from the systems flood waters. Any habitable development within the floodplain must be elevated one foot above the base flood elevation. The proposed project would not meet the exclusions listed in Title 21 section 21.64.130.G and therefore requires the granting of a Use Permit.

At the Land Use Advisory Committee (LUAC) hearing on March 16, 2026, members of the LUAC and the public raised concerns regarding residential development within the floodplain and ultimately cited this as the reason for their recommendation of denial. 1.2 acres of the property are located within the floodplain.

Due to the special flood hazard area (100-year floodplain), the project's hydrologist designated the southwest corner of the property as "non-buildable", making it optimal for the required stormwater quality basin. Accordingly, the project's bioretention basins (Parcels C and E) are located within the flood hazard area and exceed the required capacity required to accommodate a 95th percentile storm event (see **Figure 3**, floodplain boundary shown in blue line). If a flood (overtopping of the Carmel River) did occur, the bioretention basins would help minimize on-site floodwater ponding that could mobilize pollutants, ensuring that stormwater is conveyed away from residences and would not rise to levels capable of inundating pollutant sources. Anchoring to prevent flotation, collapse, or lateral movement of the proposed recreational amenities on Parcels C and E is required in accordance with Monterey County Code. A limited portion of three residential parcels (Lots 6-8) lies within the 100-year floodplain; all other residential parcels would be located outside of the floodplain (see **Figure 3,** floodplain boundary shown in blue line). The portions of Lots 6-8 within the floodplain would serve as rear yards and would be graded to direct flood flows away from the residences and south toward the bioretention basin adjacent to Lot 8, as shown in the Preliminary Grading Plan. Per the Preliminary Stormwater Control Plan (sheet C-9 of the project plans), no residential units or building foundations are anticipated to be developed within any portion of the 100-year floodplain. Although not anticipated, should structural development within the floodplain occur, it would be subject to the requirement of Chapter 16.16 of the County Code and require that finished floors be elevated one foot above the base flood elevation to minimize related risk and hazards to an acceptable level. As shown on the attached plans, Lots 6-8 would have pad elevations of 37.2-37.4 feet with implementation of proposed grading activities, which is above the identified 35-36 foot base flood elevation. Additionally, finished floors would be an additional 10-12 increase of freeboard. Further, while the southern portion of Val Verde Drive and Rio Road are within the floodplain, in the event of a flood, there will be additional emergency egress to Carmel Valley Road from the northern portion of Val Verde Drive, which is well outside of the floodplain. **Exhibit G** includes two memorandums detailing the project's stormwater control measures and compliance with the County's Carmel River Floodplain regulations.

Separately, as detailed in **Exhibit L**, the Applicant/Owner is voluntarily offering a $100,000 grant directly to CSA 50, which would fund approximately three years of its obligations with an estimated 10% buffer, to support a portion of its responsibility for the Carmel Floodplain Restoration Environmental Enhancement (CRFREE) Project. The purpose of CRFREE is flood risk reduction, habitat restoration, groundwater recharge and hydrologic connectivity and watershed resilience. This financial contribution would provide immediate and flexible support

toward advancing restoration work. This contribution would be made prior to issuance or acceptance of wheeling agreements from the State Water Resource Control Board.

Biological Resources

The project site has been historically cultivated. The Carmel River is approximately 1,100 feet south of the project site. The site is surrounded by commercial uses to the west, and existing low-density residential to the north and south. The Rancho Canada Subdivision is directly east and is currently under construction. Despite the disturbed condition of the site and the surrounding development, implementation of the project could impact habitat for special status species, disrupt nesting birds, and alter natural habitat. Two Biological Assessments were prepared (County of Monterey Library No. LIB240302 and LIB250157; **Exhibit I**) for the project site. No special status plant species were observed during the field surveys. Based on the absence of suitable habitat and previous site disturbance, the field surveys determined that special-status plant species do not have the potential to occur on the project site. Three special status animal species were identified as having the potential to occur within the project site based on the presence of suitable habitat or foraging. The planted mixed woodland provides suitable habitat for Monterey dusky-footed woodrat, California red-legged frog, overwintering monarch butterfly, and potential nesting and foraging habitat for non-game migratory birds and native birds. However, implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4 would reduce these impacts to a less than significant level by requiring pre-construction surveys and training, biological monitoring, and avoidance measures, including exclusionary fencing.

Cultural/Tribal Cultural Resources

Monterey County GIS identifies the project site as having high archaeological sensitivity but not within 250 feet of known archaeological resources. The project site is disturbed as it has been historically cultivated. An archaeological report was prepared and concluded that there is no surface evidence of potentially significant archaeological resources. While no historic or archaeological resources have been identified within the project site, the site is located within an area of regional archaeological sensitivity and five recorded cultural resources. Although the potential to encounter historic or archaeological resources is low based on site-specific study, construction of the project would require ground disturbance, such as grading and excavation in an area of regional sensitivity. Mitigation Measure CR-1 will be implemented, which requires an on-call archaeological monitor to be retained for the duration of all project related ground-disturbing activity and a pre-construction cultural awareness training to be conducted prior to the commencement of any such activity.

Pursuant to Public Resources Code section 21080.3.1 et seq., Monterey County HCD–Planning initiated consultation with the Oholone/Coastonan-Esselen Nation, the KaKoon Ta Ruk Band of the Ohlone-Costanoan, and the Esselen Tribe of Monterey County on January 9, 2026. The Esselen Tribe of Monterey County requested consultation which occurred on February 3, 2026. Representatives of the tribe requested the on-site presence of a Native American monitor to observe all ground-disturbing activities associated with the subdivision improvements and development of the site. In addition, the tribal representative requested that the Esselen Tribe of Monterey County be included in any resource recovery program or reburial. Although the Esselen Tribe of Monterey County requested monitoring for all ground disturbance, including utilities, trenches, landscaping, foundations, etc., it is up to the lead agency to make the final

determination of mitigation measures to be implemented. The County of Monterey, as lead agency, respectfully disagrees with the extent of the requested monitoring as grading and construction related to the residential structures will not impact soils that have not already been disturbed and monitored by initial subdivisions' improvement grading (roads, utilities, detention ponds). This ensures that all disturbed soil will be monitored by a tribal representative without unduly burdening the project applicant by requiring soils to be monitored twice. Therefore, further monitoring is not warranted unless the disturbance exceeds the depths of initial grading activities.

Mitigation Measure TR-1 will be implemented, which requires a Tribal Monitor affiliated with the area to be on-site for all initial ground disturbance for subdivision improvements and for any further development that requires ground disturbance at depths deeper than what has already been monitored and excavated. Adherence to the County's standard cultural resource condition of approval (Condition No. 3) and Mitigation Measures CR-1 and TR-1 will result in less than significant impacts on cultural and tribal cultural resources.

Traffic

Access to the project site is via Rio Road. The site does not directly connect to Carmel Valley Road, though there is an excavation route to this corridor during an emergency. According to the Traffic Impact Assessment, existing daily traffic along Rio Road east of Carmel Rancho Boulevard is approximately 1,160 trips, with 45 morning and 116 evening peak hour trips. The project would add approximately 685 daily trips, including 48 morning and 66 evening peak hour trips, all entering and exiting via Rio Road.

The Transportation Impact Assessment (**Exhibit J**) analyzed 10 roadway segments to determine LOS conditions. Under existing and existing plus project conditions, three of the 10 roadway segments operate at an acceptable level of service. The other seven roadway segments operate at an unacceptable level of service. The project would not have a significant impact on these roadway segments because it would not worsen the LOS by one letter grade. Accordingly, the project would not cause an intersection's LOS to degrade below acceptable LOS or have a significant impact on an intersection already operated below acceptable levels (D-F) (Source: IX.63). Accordingly, the project would not conflict with the General Plan as it pertains to roadway congestion.

With implementation of the project, more than 0.01 in volume to capacity (V/C) ratio would be added to the intersection of Carmel Valley Road and Carmel Rancho Boulevard, which already operates at an unacceptable level of service under existing conditions and would continue to operate at an unacceptable level of service under project conditions. This change in V/C ratio conflicts with 2010 General Plan LOS standards for signalized intersections. Therefore, Mitigation Measure T-1 requires that the project convert the existing northbound left-through (middle lane of this intersection) to a northbound through-right at Carmel Valley Road/Carmel Rancho Boulevard to improve the level of service to an acceptable level and result in a less than significant impact (Condition No. 59). Additionally, the project will be conditioned to pay into the Carmel Valley Traffic Impact Program (CVTIP), which would support additional improvements within the Carmel Valley Master Plan (Condition No. 27). Adherence to Mitigation Measure T-1 and standard conditions of approval requiring payment of fair share

traffic fees would ensure impacts are less than significant relative to roadway congestion and conflicts with local transportation policies or programs.

Pedestrian and Bicycle Improvements
The project would not conflict with Section 21.64.250 of the County's Zoning Ordinance, which requires residential developments of 25 or more units to incorporate feasible trip reduction measures that reduce dependence on automobiles. Val Verde Drive would be widened to accommodate two 10-foot travel lanes, two-foot shoulders, and a five-foot decomposed granite pedestrian path (**Figure 3**). These improvements are consistent with roadway strategies in Section 21.64.250 of the County's Zoning Ordinance, which encourage maintaining safe and efficient local access and supporting multimodal connectivity within neighborhood-scale roadway networks. These improvements to Val Verde Drive would provide adequate access, internal circulation, and encourage alternative modes of travel to reduce vehicle trips. Onsite, bicycle repair and secure parking would be provided throughout. As conditioned, the project would also construct a sidewalk along Rio Road from Val Verde Drive to Carmel Rancho Boulevard, ensuring a seamless connection to the existing pedestrian network to enhance connectivity (Condition No. 26).

VMT
The Countywide average VMT per capita for residential projects is 11.4. To meet the screening threshold for a less than significant impact, a project must be equal to or less than 85 percent of the County average, or 9.7 VMT per capita. Based on the project location, the VMT per capita for the site is estimated at 11.3, which is slightly below the County average, but above the 85 percent threshold. To reduce VMT, the project, as proposed, would implement the TDM strategies. The seven proposed TDM strategies would result in a 14 percent reduction in VMT (Vehicle Miles Travelled) and a project VMT per capita of 9.7, thereby meeting the local threshold (9.7 VMT). Although the County has not adopted a formal VMT policy, HCD-Planning and Engineering Services has reviewed the proposed TDM measures below and concurs with their applicability and related VMT reduction percentage, which are consistent with VMT reduction targets used by neighboring jurisdictions following the California Air Pollution Control Officers Association Handbook. See **Exhibit J** (VMT Memo).

1. Transit Subsidies [TDM-1 (4% reduction)]: to encourage the use of nearby transit, the project would implement subsidized transit fare in the amount of $5.96, for residents who occupy the 20 percent deed restricted affordable housing units.
2. Travel Behavior Change Program [TDM-2 (4% reduction)]: the project would include the development and implementation of a travel behavior change program that would inform residents through passive educational and promotional materials on the facilities available at the project site, such as bike parking and carpool/vanpool areas, and nearby transit stops to promote the use of various transportation options.
3. Carpool/Vanpool [TDM-3 (1% reduction)]: the project would incorporate an easy access location for carpools or vanpools, which is shown on the project plans and will be identified with signage and painted curbs.

4. Bicycle Facilities [TDM-4 (1% reduction)]: the project would incorporate secure bicycle parking, as shown on project plans, to provide the added convenience and security needed to encourage the use of bicycling as a viable form of travel to destinations.
5. Pedestrian Facilities [TDM-5 (2% reduction)]: the project includes complete internal and external pedestrian network improvements including the construction of a sidewalk along the entirety of Val Verde Drive to Rio Road, thereby providing safe access for pedestrians to nearby retail areas and transit stops within 0.5 miles of the project. The project's decomposed granite pedestrian path and internal sidewalk system would connect the residences to nearby commercial services and existing transit options where no pedestrian or bicycle facilities currently exist, thereby aligning with AMBAG's Metropolitan Transportation Plan/Sustainable Communities Strategy, and Monterey County Active Transportation Plan goals.
6. EV Chargers [TDM-6 (1% reduction)]: all 148 parking spaces as shown on the project plans, would be compatible with Level 1 or Level 2 electric vehicle chargers.
7. Affordable Housing [TDM-7 (1% reduction)]: the project would include 15 deed-restricted affordable housing units, representing 20 percent of the total residences. The affordable housing units would provide opportunities for lower-income households to live closer to job centers and transit, thereby improving the jobs-housing balance, which reduces VMTs.

With implementation of the proposed TDM measures, the project would meet the County's screening threshold for a less than significant VMT impact. To ensure these TDMs are implemented into the Final Map and/or final construction plans, their requirements are either shown on the project plans or implemented through condition of approvals. Many of the TDMs would be managed by the required HOA.

Long-Term Water Supply

Currently, water on the Project site is provided by three on-site groundwater wells. The Monterey Peninsula Water Management District has confirmed that the existing water use on site has historically averaged 34.97-acre feet (AF) per year over a 10-year baseline period spanning 2016-2025, and 25 AF per year over a 20-year baseline period spanning 1993-2023. The 10-year water demand is recognized by State Water Resources Control Board and Monterey Peninsula Water Management District as the property owner's riparian water rights. The projected water demand for the development is 15.71 AF (interior annual average water demand [13.35AFY] plus exterior annual average water demand [2.36 AFY] but is rounded up to 16 AF per year for a conservative estimate) (see **Exhibit K**). As a result, the Project would result in an 18.97 AF per year reduction of water use compared to the historical 10-year average demand. Note: the project's water demand is based on one dwelling unit per lot (Lots 1-59) and 15 townhomes on Lot 60, and does not contemplate ADUs or additional structures that may require water fixtures. Future development of the proposed lots would be required to demonstrate an adequate water supply.

There are three potential water supply options that the project could utilize, some more feasible than others:

1. Obtain 16 AFY of water credits from the County's allocation to serve the project. However, per MPWMD Ordinance 197, the County's allocation of water cannot be used to establish new meters until the Cease and Desist Order (CDO) has been lifted. Here, there are no existing CalAM meters on the project site, and therefore, if the project site were to receive a water allocation, the project would not have a water source until such time as the CDO is lifted. Further, the County is currently in the process of drafting a water allocation policy and is not issuing water to property owners. Under this scenario, there is inadequate evidence of water supply to support the proposed project and make the required public health and safety findings.
2. Utilize the property's riparian water rights and establish a private water system. Under this scenario, water would be pumped out of two of the three on-site wells, treated on-site at a water treatment system, and then distributed to the proposed residential lots. To accomplish this, a private water system would need to be created and would be regulated by the State Water Resources Control Board. However, the State Water Resource Control Board will not authorize the establishment of a new water system until it has been proven that a project cannot connect to a public purveyor, such as a CalAm. While the project site cannot utilize a typical CalAm connection due to the lack of on-site meters and the current CDO, the property could utilize its riparian rights and enter into a wheeling agreement to receive water from CalAm. Therefore, there is a water supply option (wheeling agreement) where the project site could be served by a public purveyor. This wheeling agreement option is described below and is the preferred water supply option according to the State Water Resource Control Board.
3. Utilize the property's riparian water rights, wheel a portion of those rights to CalAm via a wheeling agreement, and permanently forbear the remaining rights. Given the issues with relying on the above two water supply options, the proposed project's water demand would be reliant on a wheeling agreement, which has been reviewed and approved by local and state agencies. It is described in more detail below.

Under the proposed wheeling agreement, the property owner would transfer, or "wheel", approximately 16 acre-feet/year (AFY) of its riparian water rights to CalAM to serve the Project. Cal-Am would draw 16 AF/Y of raw water from their existing wells within the same alluvial aquifer as the project site and treat the water for domestic use. Cal-Am confirmed via email on February 6, 2026 that Cal-Am has the "capability and capacity to treat the additional 16 acre-feet per year of groundwater for iron and manganese at its Begonia Iron Removal Plant." The treated domestic water would be distributed through the existing water main on Val Verde Drive, which would be conveyed to the residences through a system of new 8-inch water pipes located within the proposed street rights-of-ways. Under this scenario, all on-site water wells would be abandoned as they would not be necessary to provide domestic or landscaping water. CalAM has issued a conditional can-and-will serve letter confirming this approach (**Exhibit M**).

The applicant also proposes to formally dedicate, or otherwise permanently forbear, the remainder of their riparian rights (18.97 AF of riparian water per year) for beneficial in-stream uses in the Carmel River, which will help to improve the Carmel River instream flows. The property is hydraulically connected to the Carmel River alluvial aquifer; reduced pumping of the

Project Wells would directly benefit surface water conditions not only at the project site but throughout the interconnected aquifer system. Increased instream flows provide multiple ecological benefits, including improved aquatic habitat conditions, habitat connectivity, enhanced water quality, and improved passage and rearing conditions for steelhead and other native species within the lower Carmel River.

This wheeling agreement proposal was confirmed by the State Water Resource Control Board (SWRCB) to not be in conflict with the existing Cease-and-Desist Order, which restricts Cal-Am's diversions from the Carmel River (**Exhibit L**). A similar wheeling agreement was utilized for the adjacent Rancho Canada Subdivision project. The SWRCB found, "Project's reduction in consumptive use and dedication or permanent forbearance of water to instream beneficial use will contribute to reducing reliance on unlawful Carmel River diversions, while providing a net environmental benefit to the watershed." This finding is contingent upon implementation of the project as described, including completion of the Water Code section 1707 instream flow dedication or a permanent forbearance agreement, adherence to the identified water demand for the housing development, and completion of the restoration commitments described in the City Ventures' April 1, 2026 proposal (**Exhibit L**).

The fundamental intent of the County General Plan Goal PS-3.1 and associated policies is that new development must have a long-term water supply in terms of quantity and quality. The analysis shows that the Project would not increase consumptive water use, would result in increased recharge to the Carmel Valley Alluvial Aquifer, and would not result in any substantial adverse effect on Carmel River instream flows. In short, the proposed project, as conditioned, has demonstrated that there is a long-term adequate water supply to support the proposed 74 units.

Prime Farmland

Within the 12.5-acre project site, approximately 11.2 acres are designated as Prime Farmland under the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP). Approximately 10 acres of the 12.5-acre project site are currently used for row crop agriculture producing strawberries, melons, artichokes, squash, pumpkins, fennel, fava beans, zucchini, radishes, and flowers. The project would convert the entire 11.2 acres designated as Prime Farmland from the current agricultural use to non-agricultural use as a residential development.

Chapter 21.92 (Regulations to Mitigate For Development On Farmland) of the County's Zoning Ordinance establishes regulations to mitigate the loss of farmland, as designated by the FMMP, as a result of development or the conversion of farmland to non-agricultural uses or the redesignation of land from an agricultural designation, pursuant to the General Plan (e.g., Farmland, Permanent Grazing, and Rural Grazing) to any designation other than an agricultural designation. However, Chapter 21.92 only applies to land designated or zoned for agriculture. The project site is designated in the Carmel Valley Master Plan (CVMP) as Low Density Residential and is zoned as Low Density Residential within a Design Control District, both of which are designated for residential uses. Therefore, Chapter 21.92 does not apply to the proposed project and does not trigger mitigation requirements.

Because the project site contains 11.2 acres of land designated as Prime Farmland, a LESA report was prepared to quantitatively evaluate the project's potential impacts on agricultural resources. A Land Evaluation and Site Assessment (LESA) report was prepared (**Exhibit N**)

The California LESA model is a quantitative methodology used to evaluate potential agricultural resource impacts based on the quality of agricultural soils and the surrounding land uses. These factors are scored and combined to generate a total LESA score. The purpose of the report was to provide a quantitative assessment to evaluate the project's potential impacts to agricultural resources. LESA scores range from zero to 100, with scores between zero and 39 indicating no significant impact to agricultural resources, scores of 80 or higher indicating a significant impact, and scores between 40 and 79 considered potentially significant depending on individual sub-scores. According to the LESA report, the project's overall LESA score is 68.5. While scores within the 60–79 range can indicate a significant impact, significance is not triggered when either the Land Evaluation or Site Assessment sub-score is below 20 points. The project's Land Evaluation sub-score is 49.75, reflecting the agricultural capability of underlying soils, while the Site Assessment sub-score is 18.75 due to the limited extent of surrounding agricultural lands. In addition, the LESA report concludes that the site is isolated from other important farmlands and does not function as part of a broader agricultural landscape, meaning the conversion of Prime Farmland to non-agricultural use for the project would not significantly affect agricultural resources.

The Monterey County Agriculture Commissioner's Office reviewed the proposed project and the LESA and concurred with its less-than-significant impact determination. Therefore, based on the site's residential land use designations and the LESA sub-scores indicating a limited agricultural context, the project would not result in a significant impact converting Prime Farmland to non-agricultural use.

Development on Slopes in Excess of 25%

While the 12.5-acre project site is relatively flat. However, there are approximately 1,800 square feet of man-made slopes that are in excess of 25%. The steeper slopes are on the perimeter of the property's cultivated area, and drainage ditches along portions of Val Verde Drive. Implementation of the project will require grading of the entire site and, therefore, will involve approximately 1,800 square feet of development (grading) on slopes in excess of 25%.

Pursuant to the Monterey County General Plan Policy OS-3.5, development on slopes in excess of 25% shall be prohibited unless a Use Permit is obtained and the appropriate authority makes one or both of the following findings based upon substantial evidence:

1. there is no feasible alternative that would allow development to occur on slopes of less than 25% and/or
2. the proposed development better achieves the resource protection objectives and policies contained in the Monterey County General Plan, accompanying Area Plans, and all applicable master plans.

In this case, there is no feasible alternative that would allow the proposed 60-lot subdivision and 74-unit housing development project to not impact slopes in excess of 25%. Primarily, the impacts to slopes are occurring as a result of required road improvements to Val Verde Drive,

which are being required to provide adequate ingress/egress to the subdivision, as well as meet the access requirements of the Fire Department.

Additionally, the housing development project cannot be conditioned or modified to its lower density to comply with subjective standards, such as Policy OS-3.5, pursuant to the Housing Accountability Act, and further, it cannot be modified without the County finding, based on a preponderance of the evidence, that the housing development project would have a specific, adverse impact upon the public health or safety and there is no feasible method to mitigate the public health and safety impact without lowering the density or rendering it unaffordable.

Here, staff recommends the Planning Commission find that the project meets the criteria of Policy OS-3.5.

Fire Hazard and Emergency Evacuation

The project site is located within a Moderate Fire Hazard Severity zone but is not located within a state responsibility area. All new structures and utility infrastructure are required to include fire safety requirements, such as fire-residence rating and fire protection systems in accordance with Section 18.14.080 of the Monterey County Code. A Fuel Management Plan for the project was prepared for the project, which was reviewed by the Cypress FPD on November 18, 2024, and did not raise any concerns or indicators of inconsistencies with applicable requirements.

Staff received additional comments from Cypress FPD on April 13, 2026 requesting additional emergency egress points from each respective side of the subdivision, which have been provided and are indicated on the project plans. At the Land Use Advisory Committee (LUAC) hearing on March 16, 2026, public comment was made regarding potential inadequate evacuation plans in the case of an emergency. In response to public comments, a condition has been prepared to require that the Applicant/Owner/HOA prepare an Emergency Action Plan (EAP). The EAP will be provided to each single-family dwelling owner and each tenant of the affordable townhomes. The EAP shall include emergency contact information, before -, during- and after-evacuation procedures, specific duties of tenants, transportation arrangements, and Evacuation Guide & Checklist (prepared by the Monterey County Office of Emergency Services), and a site plan illustrating emergency exit routes and areas of refuge.

CEQA (Mitigated Negative Declaration)

Pursuant to Public Resources Code Section 21083, and California Environmental Quality Act (CEQA), the Lead Agency shall conduct environmental review in the form of an Initial Study to determine if the Project may have a significant effect on the environment, and shall prepare a Negative Declaration if there is no substantial evidence that the Project or any of its aspects may cause a significant effect on the environment. Monterey County, as Lead Agency, through HCD-Planning, prepared an initial study pursuant to CEQA (**Exhibit C**). The Initial Study identified several potentially significant effects, but the applicant has agreed to the proposed mitigation measures that avoid the effects or mitigate the effects to a point where clearly no significant effects would occur. Based upon the analysis of the initial study, HCD-Planning prepared a mitigated negative declaration (**Exhibit C**).

Resource areas that were analyzed in the IS/MND included: aesthetics, agriculture and forest resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation/traffic, tribal cultural resources, utilities and service systems, and wildfire. The County identified potentially significant impacts to Biological Resources, Cultural Resources, Noise, Transportation/Traffic, and Tribal Cultural Resources. Mitigation measures have been proposed to reduce the identified impacts to a level of less than significant and are further discussed throughout this Exhibit.

Pursuant to CEQA Guidelines Section 15073(e), public agencies were sent the Draft IS/MND. Five public agencies submitted comments on the Initial Study and Mitigated Negative Declaration: California Department of Conservation (DOC), Monterey Bay Air Resources District (MBARD), California Highway Patrol (CHP), California Department of Transportation (Caltrans), and State Water Resources Control Board (SWRCB) (**Exhibit D**). Minor applications and clarification changes to the Draft IS/MND were made (**Exhibit D2**). Recirculation was not warranted, and no additional mitigation measures are required to address the comments.

Responses to comments are attached as **Exhibit D1**, and are summarized below:

1. DOC letter states that the conversion of agricultural land represents a permanent loss and impact on agricultural resources. This commenter recommended that the IS/MND address mitigation for the loss or conversion of agricultural land and provided general guidance on the information to include in environmental review for projects that involve the conversion or loss of agricultural land. As detailed in Section IV.2 of the IS/MND, *Agricultural Resources*, the Land Evaluation and Site Assessment (LESA) report prepared for the project found that because the site is isolated from other important farmlands and does not function as part of a broader agricultural landscape, the project would not significantly impact agricultural resources. The Monterey County Agricultural Commissioner's office reviewed the LESA and concurred with the less-than-significant impact finding. The site is designated and zoned for Low Density Residential use under the applicable Carmel Valley Master Plan. Because the site's land use designation is residential, County Zoning Ordinance Chapter 21.92, which establishes mitigation requirements for development on agriculturally designated land, does not apply to the project.
2. The MBARD letter describes the context and requirements of MBARD Rules 402, 424, and 439, states that fugitive dust should be mitigated during project construction, recommends that all buildings proposed for demolition test for asbestos in the building materials, recommends the use of Tier 3 and 4 construction equipment, and recommends alternatives to open hearth fireplaces. As described in Section VI.3 of the IS/MND, *Air Quality*, the project would have less than a significant air quality impact. Fugitive dust emissions generated during project construction would be temporary, short-term, and below MBARD significance thresholds. As stated in Section IV.9 of the IS/MND, *Hazards and Hazardous Materials*, demolition and construction would be required to comply with MBARD Rule 424, which enforces the National Emissions Standards for Hazardous Air Pollutants regulation with authority delegated by the United States Environmental Protection Act. As described in Section VI.3 of the IS/MND, *Air Quality*,

all construction equipment would be equipped with United States Environmental Protection Act Tier 4 engines. The project does not propose open hearth fireplaces within any of the residential structures. Project construction would conform to all applicable air quality standards and regulations, including Rules 402, 424, and 439.

3. The CHP letter states that the project would result in increased vehicular travel, which would impact traffic safety on SR-1 and surrounding roadways. CHP raised concerns relative to increased incidents requiring emergency response during project construction; traffic congestion near Rio Road and SR-1; increased congestion during peak commute hours, which could increase crashes and slow emergency response times; and additional enforcement demands. The commenter's concern regarding increased congestion resulting in an increase in crashes and slower first responder response times is acknowledged. The County confirmed with Cypress Fire Protection District that there are emergency access gates on the north end of Val Verde Drive, at the intersection of Val Verde Road and Carmel Valley Road, which would provide a secondary means of ingress and egress to facilitate emergency access during project construction and operation. Cypress FPD is located 0.5 miles west. Implementation of the project will not interfere with the FPD's access to the site or nearby properties. As described in Section VI.9 of the IS/MND, *Hazards and Hazardous Materials*, the project would not impair an adopted emergency response plan or emergency evacuation plan. The project site is located near Carmel Valley Road and SR 1, which are identified as evacuation routes in the General Plan Safety Element. Although the project would result in an increase in population and associated vehicular travel, as discussed in Section VI.15 of the IS/MND, *Public Services*, it would not generate population growth beyond that anticipated in the County's General Plan or require new or expanded police protection facilities. Section VI.17 of the IS/MND, *Transportation and Traffic*, evaluates increased vehicular travel associated with project construction and operation using vehicle miles traveled (VMT), consistent with the requirements of CEQA Guidelines Section 15064.3(b) and guidance from the Governor's Office of Land Use and Climate Innovation. As discussed in Section II of the IS/MND, *Project Characteristics*, the project incorporates traffic demand management (TDM) strategies consistent with County policies to reduce vehicle trip generation. Pursuant to Senate Bill 743, level of service (LOS) and congestion are no longer used to determine the significance of transportation impacts under CEQA. The IS/MND includes an informational discussion of LOS and congestion to demonstrate consistency with the County's Circulation Element. Vehicle safety rules and enforcement requirements would continue to apply to project construction and operation, consistent with existing laws and regulations.
4. Caltrans' letter states that the IS-MND should incorporate a summary of the analytical results in the Traffic Impact Analysis on the intersections on SR-1, specifically Rio Road and Carmel Valley Road, to enable Caltrans to review the potential impacts and issue further comments that may be warranted. CEQA Guidelines Section 15064.3 specifies VMT as the sole appropriate metric to evaluate transportation impacts. As described in Section VI. 17 of the IS/MND, *Transportation and Traffic*, the transportation and traffic analysis was based on a VMT assessment conducted in accordance with CEQA requirements and the Governor's Office of Land Use and Climate Innovation. The traffic analysis's results regarding the intersections on SR-1 are outside the scope of CEQA. However, the IS MND includes a discussion of LOS and congestion, including at SR-1,

for informational purposes. Caltrans commented on and reviewed the various traffic reports throughout the review of this project. Caltrans requested revisions to the draft IS/MND to identify additional transit services nearby and update reference to 2024 CAPCOA Handbook, consult with Monterey-Salinas Transit if transit improvements are proposed, and requests additional information about the specifics of the transit subsidy. As recommended by Caltrans, Section VI. 17 of the draft IS/MND, *Transportation and Traffic*, was revised to also describe Routes 5 and 91 as transit services in the project vicinity, and updated to include reference to 2024 CAPCOA Handbook, rather than the 2010 CAPCOA Handbook. The analysis that relied on the 2010 CAPCOA Handbook remains adequate, and no other changes are needed. No transit improvements are proposed. The additional details regarding transit subsidies, including cost and duration, will be developed through the implementation of Condition No. 31, but is not yet available. However, the subsidies will be at least $5.96 per day (administered on a monthly basis), provided to all affordable housing tenants, and managed through the HOA.

5. The SWRCB letter commented on the project three potential water supply options. However, the proposed project is only reliant on the wheeling agreement water supply option and therefore comments pertaining to other water supply scenarios are no longer applicable. As conditioned, all on-site wells will be destroyed, as requested by SWRCB. SWRCB requested consideration of potential water treatment by Cal-Am Monterey at an existing treatment facility. As described in Section VI. 19 of the IS/MND, *Utilities and Service Systems*, Cal-Am confirmed the capability and capacity to treat the additional 16 acre-feet per year of groundwater for iron and manganese at the Begonia Iron Removal Plant. Fire flow would be provided provided through the existing water main in Val Verde Drive and meet local and state requirements. The commenter states that a stormwater basin is proposed near the Carmel Presbyterian Church well in a 100-year flood hazard area. The commenter requests a discussion of how the well will be protected from contamination and a determination of whether the regulations can be met or if a waiver or alternative to Waterworks Standards for domestic wells (California Code of Regulations, Title 22, Chapter 16) is anticipated. The on-site wells, including the Carmel Presbyterian Church well, were constructed with sanitary seals extending to depths of approximately 50 to 70 feet. The sanitary seals are designed to prevent the downward migration of surface water, thereby protecting groundwater quality and reducing the potential for contamination. The Carmel Presbyterian Church well is located within a floodplain; however, the well head is elevated and can be further elevated if required to meet California Code of Regulations, Title 22, Chapter 16 requirements. As described in Section VI. 10, Hydrology and Water Quality, the project would not violate water quality standards or substantially degrade water quality. The proposed stormwater basin would be constructed and operated in compliance with applicable federal and state regulations that require protection of groundwater quality. Under the federal Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) program, stormwater controls such as the proposed stormwater basin are required to prevent pollutants from causing or contributing to violations of water quality standards by filtering pollutants at the source. Consistent with these federal requirements, the stormwater basin proposed near the Carmel Presbyterian Church well would remove pollutants from stormwater through a combination of physical, biological, and chemical treatment processes including

absorption, filtration, plant uptake, microbial activity, decomposition, sedimentation and volatilization as stored water gradually exfiltrates over a period of days. Furthermore, all on-site wells will be destroyed.

This page intentionally left blank