

## **EXHIBIT C**

### **Addendum To Final Environmental Impact Report (#94-005) (SCH94083019, SCH95023036) Pursuant to the California Environmental Quality Act Article 11, Section 15164**

#### ***Heritage Development Planning File No. PLN060603 Combined Development Permit--Minor Subdivision***

##### **1. Introduction**

This technical addendum has been prepared pursuant to Article 11, Section 15164 of the California Environmental Quality Act guidelines to make minor technical changes to the project analyzed in the EIR prepared for the Santa Lucia Project which included approval of a Comprehensive Development Plan allowing development of up to 350 units (297 market rate and 53 affordable), certified *February 6, 1996*, by *the Board of Supervisors Resolution No. 96-059*. None of the conditions described in Section 15162 calling for preparation of a subsequent EIR or negative declaration have occurred.

##### **2. Scope and Purpose of this Addendum**

This Addendum describes whether any changes or additions are necessary to the FEIR as a result of the proposed project to subdivide 3 lots into 4 lots. The 3 existing lots are included in the existing unit count for the Santa Lucia Preserve within the Carmel Valley Master Plan area. The proposed project would result in creation of permanent roads on slopes in excess of 30% and the removal of native trees. The EIR certified for development of the Santa Lucia Preserve evaluated the impacts associated with development of 350 units within the boundaries of the Santa Lucia Preserve. The Comprehensive Development Plan (CDP) and FEIR contemplated that 62 of these units would be constructed within the Carmel Valley Master Plan area. Currently 56 units (including the 3 existing lots) have been allocated (or approved for construction) as part of Santa Lucia Development within the CVMP area.

The project objective of the Santa Lucia preserve was to establish a permanent preserve for native plant and wildlife habitat while pursuing limited development of the least environmentally sensitive land. Approximately 18,000 acres of the 20,000 acre site was set aside as preserve lands and is a managed wildlife preserve. The remaining 2,000 acres were designated for development. The residential areas designated for development were identified as "Homeland Boundaries" which established the limits of development within the residential lots proposed as part of the Preserve development.

The EIR for the Santa Lucia Preserve did not specifically mention the subdivision of this property, but it did contemplate the creation of units within the area covered by the Carmel Valley Master Plan. Furthermore the maps within the Comprehensive Development Plan show the subject site with Homeland areas, so the clear intent of the CDP and the analysis of the EIR was that there would be development on this site.

A key component of the CDP is that it focuses on resource protection and limiting impacts. Compliance with the provisions of the plan is intended to mitigate environmental impacts. A component of the CDP is a Resource Management Plan which includes provisions to identify and protect unique and valuable resources including special status plant and wildlife species, wetlands, riparian corridors, wildlife corridors, sensitive habitats, watersheds and Long-Range Management.

The application requests approval to allow grading on slopes exceeding 30%. The layout of the map has been designed in conformance with the CDP in that the Homeland Boundaries are located in areas where slopes are less than 30% and where there would be no significant vegetation disturbance. The Homeland Boundaries would be accessed across roads and driveways following the alignment of existing ranch roads on the site. Sections of these ranch roads cross areas where the slope exceeds 30% and some grading will be necessary to improve these roads. This is consistent with the CDP and the EIR analysis for development within the Santa Lucia Preserve.

The project also includes approval to remove up to 20 Coast Live Oak Trees. This tree removal estimate stems from the original application which proposed 10 lots. The application has been modified to include the creation of 4 lots. The Homeland Boundaries are located to avoid the need to remove trees. There will be some tree removal associated with the installation of the roads. The Santa Lucia Preserve EIR identified that where there would be tree removal they needed to be replaced on a 3:1 or for Landmark trees 5:1 basis. That mitigation measure will be implemented as part of this project.

In a 1997 Addendum prepared for the Santa Lucia Preserve FEIR the hydrologic impacts of the parcels located in Carmel Valley was discussed. The initial EIR did not evaluate these parcels because they were downstream and down slope of the main project area and wells in these areas would not be used to provide water to the remainder of the development in the Santa Lucia Preserve. The Carmel Valley parcels had existing wells to providing water. The addendum identifies that the subject site was under agricultural use and that up to 69 units could be constructed on the Carmel Valley parcels, but that the water would come from the water system for the Santa Lucia Preserve. The applicant for this application does not propose to change the existing water source and has submitted a Riparian Water Right Determination. This determination shows that the site has a right to 26 acre feet of water that has been recorded since 1981 when record keeping began. The subdivision of this property would not result in an increase in water use, but would constitute a decrease in use for a property with more than sufficient water right to service 4 lots.

Due to the duration between the approval of the CDP and this application, the applicant prepared studies addressing archaeology, geology, biology, arboricultural, traffic and historical resource impacts. These studies have not revealed any changes to the circumstances or understanding associated with the certification of the FEIR for the Santa Lucia Preserve.

### 3. Conclusion

As the discussion above illustrates the proposed project does not result in additional impacts or an increase in the severity of impacts; does not result in impacts that existing mitigation or requirements from the Comprehensive Development Plan don't reduce to a less than significant level, and there are not substantial changes in the site or new circumstances that need to be accounted for. Accordingly none of the conditions described in Guidelines Section 15162, requiring a subsequent EIR exist. Therefore, an Addendum is appropriate under CEQA Guidelines Section 15164.

FEIR 94-005(Santa Lucia Preserve) is available for review at the Monterey County Planning Department and on the County Website.