Chapter 3.10
Public Services, Utilities, and Recreation

Introduction

This chapter provides a discussion of public service, utility, and recreation issues related to the Proposed Project and the 130-Unit Alternative in the Carmel Valley. This chapter includes a review of existing conditions based on available literature and field surveys; a summary of local, state, and federal policies and regulations related to other issues; and an analysis of direct and indirect environmental impacts of the project. Where feasible, mitigation measures are recommended to reduce the level of impacts.

Impact Summary

Table 3.10-1 lists the impacts and mitigation measures for the Proposed Project and the 130-Unit Alternative. As shown in **Table 3.10-1**, the Proposed Project and the 130-Unit Alternative would have some significant adverse impacts related to public services and utilities within the project area. However, with the implementation of the mitigation measures described within this chapter, all of the impacts listed would be reduced to less-than-significant levels. The Project would be designed in accordance with applicable fire code design standards to reduce the risk of damage and injury during fire emergencies. Likewise, construction and engineering coordination would be used to minimize utility disruptions during construction periods.

Table 3.10-1. Public Services, Utilities, and Recreation Impact Summary

Impact	Proposed Project Level of Significance	130-Unit Alternative Level of Significance	Mitigation Measure	Level of Significance after Mitigation
A. Fire and Police Services				
PSU-1: Increased Demand for Fire and First-Responder Emergency Medical Services	LTS	LTS	None Required	--
PSU-2: Increased Demand for Police Services	LTS	LTS	None Required	--
B. Emergency Access				
PSU-3: Interference with Emergency Access Routes or Adopted Emergency Access Plans	LTS	LTS	None Required	--
C. Wildland Fire Hazard				
PSU-4: Expose People or Structures to a Significant Risk of Loss, Injury, or Death Involving Wildland Fires	LTS	LTS	None Required	--

Impact	Proposed Project Level of Significance	130-Unit Alternative Level of Significance	Mitigation Measure	Level of Significance after Mitigation
D. Water Demand				
PSU-5: Increased Water Supply Demand	LTS	LTS	None Required	--
E. Infrastructure Capacities				
PSU-6: Increased Demand for Water and Sewer Infrastructure	Potentially Significant	Potentially Significant	PSU-1: Test Well Supply, Identify Water Treatment and Distribution Facilities, and Avoid Impacts on Biological Resources	LTS
F. Wastewater Treatment Capacity				
PSU-7: Increased Wastewater Treatment Capacity	LTS	LTS	None Required	--
G. Utility Disruption during Construction				
PSU-8: Construction-Related Service Disruptions	Potentially Significant	Potentially Significant	PSU-2: Coordinate with Appropriate Utility Service Providers and Related Agencies to Reduce Service Interruptions	LTS
H. School Enrollments				
PSU-9: Increased Student Enrollments	LTS	LTS	None Required	--
I. Recreational Demand				
PSU-10: Increased Use of Existing Neighborhood and Regional Parks	LTS	LTS	None Required	--
J. Open Space				
PSU-11: Quality and Quantity of Open Space Used for Recreation	LTS	LTS	None Required	--
K. Landfill Capacity				
PSU-12: Increased Demand for Solid Waste, Green Waste, and Recycling Disposal Needs	LTS	LTS	None Required	--
LTS = Less than Significant, NI= No Impact				

Environmental Setting

The Proposed Project and the 130-Unit Alternative area located in the mouth of the Carmel Valley just south of Carmel Valley Road. Carmel Valley is situated about 130 miles south of San Francisco, near the Cities of Carmel-by-the-Sea, Pacific Grove, and Monterey.

Existing Conditions

Table 3.10-2 summarizes the service, utility and recreation provided in the project area.

Table 3.10-2. Summary of Public Service, Utility, and Recreation Providers in the Project Area

Public Service or Utility	Service Provider
Wastewater	Carmel Area Wastewater District
Electricity and Natural Gas	Pacific Gas & Electric Company
Communication Services	AT&T
Solid waste	Monterey Regional Waste Management District
Education	Carmel Unified School District
Police	Monterey County Sheriff's Office
Fire	Cypress Fire Protection District
Parks	Monterey County Parks Department/ Monterey Peninsula Regional Park District / California State Parks

Communication Services

AT&T provides telecommunication and Internet services in Monterey County, while cable television services are provided by Comcast Cable. At this time no facilities exist to support either service onsite, however these services are available immediately to the north and west of the Proposed Project and the 130-Unit Alternative site.

Electricity and Natural Gas

PG&E is the gas and electrical service provider that has been delivering energy to the Carmel Valley area for years. While service exists to the north and west of the project site, currently there are no existing gas mains or electrical distribution systems in place to serve the project area.

Schools

The Carmel Unified School District (CUSD) serves Carmel–by-the-Sea and the unincorporated areas of the Carmel Valley, including the project area. CUSD is comprised of three elementary schools (K through 5th grade), one middle school (6th through 8th grade), and one high school (9th through 12th grade). In addition, CUSD provides one continuation high school, an adult school, and a child development center for district residents.

The following schools serve the project area.

- Carmel River Elementary School: Monte Verde Street and 15th Avenue, Carmel, CA.
- Carmel Middle School: 4380 Carmel Valley Road, Carmel Valley CA (adjacent to the project site).

- Carmel High School: 3600 Ocean Avenue Carmel, CA.

According to enrollment data from the Education Data Partnership, the Carmel School District has experienced an increase in enrollment at a rate of 2.95% per year between 2004 and 2014 (Education Data Partnership 2014).

Fire Protection

The project area falls within the jurisdiction of the Cypress Fire Protection District (CFPD), which covers approximately 7.4 square miles of the Carmel Valley (Acosta pers. comm.). The District operates under contract agreement with the California Department of Forestry. CFPD responds to the fire and medical emergency needs in the Carmel Valley from the Rio Road and Carmel Hill Fire Stations. Staffing of these stations is comprised of two 4-person engine companies, 1 battalion chief, and approximately 20 volunteer/standby firefighters (Acosta pers. comm.). The Rio Road Fire Station is located at 3775 Rio Road, and would be the closest to the project area.

The CFPD strives to maintain a service response time standard of 8 minutes and, as of 2014, the average response time for emergency calls was less than 5 minutes (Acosta pers. comm.). The CFPD currently has an Insurance Services Office Class 3 rating (Class 1 represents the most protected, Class 10 the least). However, the Fire Captain expects that the ISO class rating will be reduced in the future due to a recent increase in personnel and current level of response (Acosta pers. comm.).

Parks / Open Space

Over 290,000 acres of land in Monterey County is devoted to park and recreational facilities operated by various agencies (Monterey County 2010). The Monterey County Parks Department maintains approximately 12,155 acres of those lands within 9 county regional parks (ICF International 2010). These county parks and freshwater recreation areas provide overnight and day-use recreational opportunities for county residents.

The Monterey Peninsula Regional Parks District manages 24 regional parks, open spaces and preserves in the County totaling approximately 14,000 acres (ICF International 2010). Located adjacent to the project area, the 10,000-acre Palo Corona Ranch was acquired by the Regional Park District in 2004 and is managed together with the Big Sur Land Trust. Since 2004, the Regional Parks District has relied on funding from yearly assessments from single-family dwellings in the County (Monterey Peninsula Regional Park District 2014).

Within the County, the State of California Parks Department operates 20 parks that total 17,567 acres. Major state recreational areas include the Carmel River State Beach, Point Lobos State Reserve, Garrapata State Park, and Pfeiffer Big Sur State Park (ICF International 2010). In addition, approximately 22 golf courses are located within Monterey County, including the Rancho Cañada Golf Club.

Police Services

The Monterey County Sheriff's Office (MCSO) currently provides law enforcement services in the unincorporated areas of the County, including the project area. The Sheriff's patrol district is broken into three regional response stations: Central (Salinas), Coastal (Monterey) and South County (King City). The Coastal station serves the unincorporated areas of the Monterey Peninsula, Carmel Valley, and 100 miles of the coastline (MCSO website). The Coastal station is located at 1200 Aguajito Road

in the City of Monterey. Twenty-two deputies operate out of this station, however, personnel from the Salinas and King City stations are available for additional assistance as needed. In addition, the Sheriff's Department includes a Community Field Office in Carmel Valley Village that is occasionally manned by deputies.

The three 'beat' areas that cover Carmel-by-the-Sea and the Carmel Valley are, Beat 7, Beat 8A, and Beat 8B. Together these beats cover the area of Carmel Valley Road from Ocean Avenue east to the 38-mile marker past Laureles Grade. Each beat is manned at minimum with one deputy, with an extra two deputies patrolling the entire area between the hours of 10 pm to 8 am. Average response time for Beat 7, 8a, and 8B is 7 minutes (Galletti pers. comm.). Beat 7 would cover the project area.

The California Highway Patrol provides traffic enforcement and accident investigation for Carmel Valley. The Sheriff's Department may also aid in traffic enforcement, however their primary function is to respond to criminal violations.

Solid Waste

Within the project area, solid waste pick up services are provided by Waste Management, Inc. and transferred to the Monterey Peninsula Landfill and Recycling Facility. The landfill is owned and operated by the Monterey Regional Waste Management District (MRWMD), which serves the greater Monterey Peninsula area; a 853-square mile service area that includes the project area. The landfill is located at14201 Del Monte Boulevard, in Marina and has a life expectancy of 150 years. As of 2014, the facility has a remaining capacity of 48 million tons (71 million cubic yards) of additional solid waste (Monterey Regional Waste Management District 2014). In 2004, the landfill received 369,389 tons of solid waste and recycled or diverted 142,425 tons. Currently the facility is exceeding the state mandated 50% diversion rate (Monterey Regional Waste Management District 2013).

Local recycling is provided by the MRWMD at 12 locations throughout the service area. Closest to the project area is the Carmel Valley Transfer Facility located at 9 Pilot Road, approximately 10 miles from the site.

Wastewater (Sewer)

The Carmel Area Wastewater District (CAWD) provides wastewater collection, treatment and disposal services to the project area. An existing 12-inch sewer trunk line runs westerly, parallel, and about 60 feet north of the northern boundary line of the Proposed Project and the 130-Unit Alternative site.

CAWD wastewater treatment facility, located 1.2 miles west on SR 1, has a permitted average dry weather treatment capacity of 3-million gallons per day (mgd) and is currently operating at 1.4 mgd (Carmel Area Wastewater District 2014). The CAWD facility is a tertiary plant that provides reclaimed water for landscape irrigation during the dry season, and when irrigation demand is low during the wet season, the treated effluent is discharged into the Pacific Ocean via an existing permitted outfall.

Water Supply

Cal-Am is the water purveyor for the majority of customers in the following areas: Monterey Peninsula, the Cities of Sand City and Del Rey Oaks, portions of the City of Seaside, portions of the Highway 68 corridor, Carmel Valley from about River Mile 15 to the Pacific Ocean, Carmel, and

portions of the Carmel Highlands and Yankee Point areas. Many customers within this area are served from other systems; the largest is the City of Seaside municipal water system, and the smallest are individual domestic wells. In addition, many large properties, including the Rancho Cañada Golf Club, Carmel Valley Ranch, Tehama and Monterra Subdivisions, and the Santa Lucia Preserve (Rancho San Carlos), are served by private wells. Private wells are subject to regulation by the Monterey Peninsula Water Management District (MPWMD).

Existing Water Use

The Golf Club wells have produced between 309 and 522 acre-feet per year (AFY) over the past 23 years (**Table 3.10-3**) for irrigation of the golf course (Zischke 2015). Cal-Am also has a potable water supply well located on the golf course property.

Table 3.10-3. Existing Rancho Cañada Golf Course Use, 1991 - 2014

Year	Irrigation (AFY)[1]	Type[2]	Precipitation (inches)[3]
1991	358.4	RY1991	13.7
1992	425.0	RY1992	18.0
1993	440.5	RY1993	30.2
1994	465.9	RY1994	13.9
1995	337.6	RY1995	28.5
1996	457.2	RY1996	20.9
1997	499.8	RY1997	21.6
1998	346.6	RY1998	47.2
1999	309.4	RY1999	20.2
2000	489.3	RY2000	20.9
2001	430.8	RY2001	19.4
2002	522.0	WY2002	15.6
2003	451.9	WY2003	18.4
2004	451.8	WY2004	16.4
2005	379.4	WY2005	30.5
2006	368.8	WY2006	24.8
2007	404.3	WY2007	14.1
2008	443.3	WY2008	14.4
2009	411.8	WY2009	17.5
2010	324.1	WY2010	23.9
2011	309.1	WY2011	24.5
2012	340.6	WY2012	13.5
2013	419.3	WY2013	13.1
2014	442.3	WY2014	8.9
Avg. 1991–2013	409.6		20.9

Notes:

[1] 1991 – 2005 from Lombardo, T. (08/23/06, Exhibit A), based on MPWMD records ("WMCALC" spreadsheets for each year. 2006 – 2014 from J. Zischke. 09/15/14 and 12/22/14.

[2] RY = Reporting Year = July 1 to June 30; WY = Water Year = October 1 through September 30

[3] 1991-Sep 1994 Precipitation from Weather Station #5795 via Hopkins Marine Station; Precipitation Oct. 1994–2014 from National Weather Service Climatological Station, Monterey, California 93940 (elevation 385'), accessed via web at: http://met.nps.edu/~ldm/renard_wx/

Regulatory Setting

This section discusses the local, state, and federal policies and regulations that are relevant to the analysis of the public service and utility issues of the Proposed Project and the 130-Unit Alternative being considered by Monterey County.

Federal Policies and Regulations

The only federal regulation that affects public services and utilities relative to this Project and the 130-Unit Alternative is the federal Endangered Species Act (ESA) related to use of water in the Carmel River aquifer and federally protected species.

Federal Endangered Species Act

The federal ESA protects species, and their habitats, that have been identified by USFWS or the National Oceanic and Atmospheric Administration (NOAA) Fisheries (formerly known as the National Marine Fisheries Service) as threatened or endangered. *Endangered* refers to species, subspecies, or distinct population segments that are in danger of extinction through all or a significant portion of their range; *threatened* refers to species, subspecies, or distinct population segments that are likely to become endangered in the near future.

The ESA is administered by USFWS and NOAA Fisheries. In general, USFWS has authority over listed terrestrial plants on lands under federal jurisdiction and over listed wildlife species, regardless of whether publicly or privately owned. Relevant to this Project, USFWS has authority over the California red-legged frog (CRLF) in and adjacent to the Carmel River. In general, NOAA Fisheries is responsible for protection of ESA-listed marine species and anadromous fish, whereas other listed species are under USFWS jurisdiction. Relative to the Proposed Project, NOAA Fisheries has authority over federally listed South-Central Coast steelhead in the Carmel River.

Relative to water use, water right permits obtained from the State Water Resources Control Board (State Water Board) include a standard caveat that such rights do not supersede the authority of the federal ESA. Some parties have argued that the federal ESA can also supersede individual water rights, but this is controversial and the subject of extensive litigation. NOAA Fisheries has focused intensive attention on the Carmel River as it is viewed as a lynchpin to preserve the South-Central Coast steelhead gene pool.

Biological resource impacts are further addressed separately in Section 3.3, *Biological Resources*.

State Policies and Regulations

SB 610 and SB 221 Applicability

SB 610 and SB 221 (Water Code Section 10912 and Government Code Section 65867.5, respectively) are companion measures that support planning between water suppliers and local jurisdictions. SB 610 expands the existing requirement that lead agencies confer with affected public water agencies when preparing a negative declaration, mitigated negative declaration, or EIR for certain large projects. The water agency is required to provide the lead agency a detailed water supply assessment (WSA) of whether the water agency has sufficient current and future water supplies to service the proposed project and other expected future projects (Water Code Section 10910). The

WSA must be considered during the CEQA process. If there is insufficient water, the County must include that determination in its findings for the project (Water Code Section 10911).

A WSA (per Water Code Section 10912) is required for:

1. A proposed residential development of more than 500 units.
2. A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
3. A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
4. A proposed hotel or motel, or both, having more than 500 rooms.
5. A proposed industrial, manufacturing, or processing plant, or industrial park planned to have more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
6. A mixed-use project that includes one or more of the projects specified in this subdivision.
7. A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

The Proposed Project is only 281 units and thus does not exceed the trigger for a WSA. For the 130-Unit Alternative, the residential element does not trigger a WSA and the combined water demand of the 130 units and proposed water transfer(as shown below) is less than the equivalent of 500 units and thus a WSA is not triggered.

California Water Rights Overview

California administers its water rights under a bifurcated system that generally separates water rights associated with surface water (such as the water in streams, rivers, and lakes) from the water rights associated with groundwater (water found in its natural state below the surface of the ground). These two systems of water rights operate almost completely separately and demands on one system are generally not considered in determining whether adequate water supplies are available under the other system. One exception to the separation described above exists when the groundwater is deemed to be underflow of a surface water system. Under this exception, because the groundwater is in close hydrologic connectivity with the surface water, and withdrawals of the underflowing groundwater have a direct impact on the availability of the surface water for diversion, the underflowing groundwater is deemed to be surface water subject to surface water rights.

In 1995 the State Water Board, in evaluating the water rights of the California-American Water Company (Cal-Am) in the Carmel Valley, concluded that the groundwater in the Carmel Valley Aquifer (CVA) below and surrounding the Carmel River was not properly classified as groundwater, but rather was classified as underflow of the Carmel River and, thus, subject to the surface water rights system (State Water Board Order No. WR 95-10, [July 6, 1995]).

Therefore, any diversions of water from the CVA would need to be made pursuant to a surface water right.

While exceptions exist, the two primary types of surface water rights in California are the riparian right and the appropriative right. The riparian right is a right that exists by nature of a parcel sitting

adjacent to a water course. Because of the proximity of the parcel to the water course, the law imputes to the parcel a right to divert water to the parcel. All owners of riparian parcels may divert the water necessary for use on their parcel, so long as the use is reasonable and beneficial. The right, however, is said to be "correlative" with all other riparian rights. This means that in a time of shortage, all riparian parcels must reduce their use of water on a pro rata basis. A parcel will generally lose its riparian status if the parcel becomes separated from the water course. Under this limitation, if a parcel is riparian and is subdivided into two parcels (one still being adjacent to the water course and the other now being separated from the water course by the other parcel), then unless explicitly stated otherwise in the documents affecting the subdivision, the parcel no longer adjacent to the water course will generally lose its riparian status.

The second primary type of surface water right in California is the appropriative right. The appropriative right is a right that does not rely on the proximity of the land to the water course. Prior to 1914, an appropriative right was established by the diversion of water for beneficial use on a parcel of land. Such diversion and use needed to be publicly manifested (either through open and notorious use or through the filing or posting of the right). Beginning in 1914, one could only establish an appropriative right by filing an application with the State and being granted a permit (and eventually a license) for the appropriative right. In contrast to the correlative nature of the riparian right, the appropriative right is based on a priority system. That is, in times of shortage, water must be allocated to the most senior holder of an appropriative right before being made available to holders of junior appropriative rights. For appropriative rights, the seniority or priority is determined by the date on which water was first put to beneficial use. Thus, for example, in a year of shortage, water would be available for a right established in 1920 before it would be available for a right established in 1921.

Carmel River: State Water Board Order WR95-10 and State Water Board Order WR2009-0060 (CDO)

In 1995, the State Water Board issued Order WR 95-10, which found that Cal-Am did not have sufficient water rights for its existing water diversions from the Carmel River. State Water Board found that Cal-Am had rights to only 3,376 AFY, and ordered Cal-Am to do the following: (1) immediately cease and desist from diverting any water from the Carmel River in excess of 14,106 AFY; (2) obtain appropriative permits for its diversions; (3) obtain water from other sources to make 1:1 reductions in unlawful diversions; and/or (4) contract with another agency having rights to divert and use water from the Carmel River. Cal-Am was also ordered to implement a water conservation plan to further reduce diversions to 11,990 AFY in 1996 and to 11,285 AFY in 1997 and subsequent years. State Water Board subsequently required Cal-Am to maintain a water conservation program with the goal of limiting annual diversions to 11,285 AFY until full compliance with the order was achieved (State Water Resources Control Board 1995). A discretionary exemption to certain limitations of WR 95-10 related to the Project Applicant's entitlement is discussed in the section on the history of the entitlement below.

The State Water Board (in Decision D-1632, as amended in Order WR 98-04) has also determined that the Carmel River is a "fully appropriated stream" from the mouth of the river upstream to the Sleepy Hollow Gage (RM 17.2) between May 1 through December 31 and that State Water Board has permit authority in this reach. Certain existing diversions present prior to Decision D-1632 are allowed to apply for a permit to allow diversion between May and December; all other applicants must limit their diversions to between January and April.

In October 2009, the State Water Board issued Order WR2009-0060, a cease and desist order (CDO), which prescribes a series of significant cutbacks to Cal-Am's pumping from the Carmel River from 2010 through December 2016. Specifically, it includes a schedule for Cal-Am to reduce diversions from the Carmel River, bans new water service connections (with certain exceptions), bans increased use of water at existing service connections resulting from a change in zoning or use, establishes a requirement to build smaller near-term water supply projects, and requires reporting procedures. If a new water supply cannot be built by the end of 2016, the CPUC, which regulates Cal-Am as a water utility, may require water rationing and/or a moratorium on new water permits for construction/remodels.

New supplies of water for Cal-Am will need to be found in order to meet the current and future demand for potable water in the County. Current planning for a new water source for the County is focused on desalination. It is believed that a new desalination plant would provide the necessary supply to meet current demand but the extent to which it would supply water for future demand is undetermined. While preparatory work for several desalination projects, including drilling and operation of a test well for one project and environmental review for several competing proposals, is underway, none of the desalination projects have yet begun construction and their timing for completion is uncertain.

Water Rights Context for Rancho Cañada Golf Club and the Project

The golf club has a series of five on-site wells that it presently uses to draw water for irrigation from the lower Carmel Valley aquifer. In the fall of 2002, the Monterey County Resource Management Agency – Planning Department retained Downey Brand LLP (Sacramento, CA) to perform an independent review of the water rights of September Ranch Development Application (PLN050001) to determine whether valid riparian rights exist. The analysis concluded that the riparian rights were not severed from the property. The Rancho Cañada Village project site originates from the same chain of title of property formally owned by the Hatton Family. The Rancho Cañada Golf Club holds pre-1914 and riparian water rights to the Camel Valley aquifer. As documented in Table 13 of Decision 1632, State Water Board also recognized that Rancho Cañada holds a superior water right to Cal-Ampost-1914 appropriation permits that have been issued to the District stemming from Decision 1632. The riparian rights have not been adjudicated, but a result of the deed mentioned above between Hatton and Pacific Improvement Co., the riparian rights appurtenant to the Rancho Cañada property have a priority superior to Cal-Am's appropriative rights to the Carmel River and Carmel River underflow excluding Cal-Am's right to extract from the Carmel Valley Basin under its pre-1914 appropriative water rights.

Table 13 of Decision 1632 recognizes a right to 700 AF for the Rancho Cañada property. The Project Applicant has also identified a prior 155 AFY reduction in water allocations for instream beneficial purposes, which results in a remaining 545 AFY for the property. A reservation of an amount of water on Table 13 of State Water Board Decision 1632 is not the same as obtaining an appropriative water right permit from the State Water Board, which entails a formal approval process. The Project Applicant has submitted an application with the State Water Board for an appropriative water right permit (Application #A30111). In order for a water right to be valid, the State Water Board must follow the public notification, protest, and environmental review process specified in the California Water Code before issuing a permit for diversion and use of water. The State Water Board has determined the application is complete, and issued notice of the Application A30111. To date, a permit has not yet been issued for Application A30111; Application A30111 is still being processed and considered for the irrigation purposes applied for by Rancho Cañada. If the Rancho Cañada

Village project is approved (or if an alternative such as the 130-Unit Alternative is approved), then a change petition will be filed with the State Water Board.

Prior to any Cal-Am service to the Rancho Cañada Village project, the Project Applicant will seek a State Water Board determination to either confirm that water diverted under Rancho Cañada's rights are not subject to Ordering paragraphs 2 and 3.(a)(5) of WR 2009-0060, or to modify its order to allow same. Nonetheless, the Project would not necessarily rely solely on Cal-Am water service, but rather as set forth in Chapter 2, *Project Description*, the water will be supplied to the Project either through the Cal-Am distribution system, or through the creation of a separate community services district or mutual water company.

If the 130-Unit Alternative is approved by the County, then State Water Board and MPWMD approvals would be obtained in order to implement the proposed uses, including the proposed water transfer. This would entail a change petition to change the purpose and place of use for approval by the State Water Board (as noted above for the Proposed Project), and the Project Applicant would seek confirmation from the State Water Board that water diverted under Rancho Cañada's rights for new subscriber use does not conflict with WR 2009-0060. Also, a new ordinance by the MPWMD similar to the ordinance allowing transfer of water entitlements from the Pebble Beach Company to other users would need to be approved, which would entail a new rule for issuance of water use permits under this entitlement. (See for example MPWMD Rules 23.5 (Pebble Beach Water Entitlement) and 23.6 (Sand City Water Entitlement). The new MPWMD ordinance would dictate the restrictions for issuance of a water use permit to approved developments and existing lots of record.

While this water rights discussion provides useful context, CEQA is solely concerned with determining the nature and extent of physical impacts on the environment that may result from a proposed project. With respect to water supply, CEQA is concerned with whether the proposed supply is physically available, and whether the use of the supply will result in any significant physical changes to environmental resources such as, a groundwater basin, water supply for other users, or biological resources.

There is one other circumstance in which a water right analysis may be relevant to a CEQA analysis, and that is if the exercise of a riparian or overlying right would displace existing water uses by virtue of the "seniority'' of the riparian or overlying right, so that the existing uses were required to obtain a water supply elsewhere. For this reason, and in order to respond to specific questions from the Court of Appeal in Save Our Peninsula Committee v. Monterey County Bd. of Supervisors (2001) 87 Cal. App. 4th 99, Monterey County has included a water right analysis in this Draft Recirculated EIR. This analysis concludes that: (i) substantial evidence indicates that the owners of Rancho Cañada Golf Course have pre-1914 and riparian rights; and (ii) under either water right system, the Project's use of water from the CVA will not injure any senior water right holders and will not displace junior water users because the Project will result in a net reduction of water use (see impact analysis below). In this regard, it should be noted that Monterey County is not the final arbiter of whether any particular property has riparian or overlying rights. Such a binding determination may only be a ruling of a court of competent jurisdiction.

California Integrated Waste Management Act

In 1989, Assembly Bill 939 (AB 939), known as the Integrated Waste Management Act, was passed into law. Enactment of AB 939 established the California Integrated Waste Management Board

(CIWMB), and set forth aggressive solid waste diversion requirements. Under AB 939, every city and county in California is required to reduce the volume of waste sent to landfills by 50%, through recycling, reuse, composting, and other means. AB 939 requires counties to prepare a Countywide Integrated Waste Management Plan (CIWMP). An adequate CIWMP contains a summary plan that includes goals and objectives, a summary of waste management issues and problems identified in the incorporated and unincorporated areas of the county, a summary of waste management programs and infrastructure, existing and proposed solid waste facilities, and an overview of specific steps that will be taken to achieve the goals outlined in the components of the CIWMP.

California Public Utilities Commission

The California Public Utilities Commission (CPUC) regulates privately owned telecommunications, electric, natural gas, water, railroad, rail transit, and passenger transportation companies. CPUC is responsible for assuring California utility customers have safe, reliable utility service at reasonable rates, protecting utility customers from fraud, and promoting the health of California's economy. CPUC establishes service standards and safety rules, and authorizes utility rate changes as well as enforcing the CEQA for utility construction. CPUC also regulates the relocation of power lines by public utilities under its jurisdiction, such as PG&E. CPUC works with other state and federal agencies in promoting water quality, environmental protection, and safety.

California Department Fish and Wildlife

As described in Section 3.3, *Biological Resources*, the California Department of Fish and Wildlife (CDFW) has authority under the California Endangered Species Act and the California Fish and Game code over certain protected resources. CDFW is also a trustee agency for California's natural heritage. The California Water Code requires that when considering the appropriation of water, the State Water Board consult with CDFW on the amounts of water needed for fish and wildlife. CDFW reviews applications to appropriate new sources of water, to change existing uses of water, and to transfer water. Therefore, CDFW may file protests or complaints to avoid adverse impacts on public trust resources (California Department of Fish and Wildlife 2014). CDFW has been intensively involved in matters concerning fish and other riparian resources associated with the Carmel River.

Local Policies and Regulations

Current County Plans and Policies

2010 Monterey County General Plan

The 2010 General Plan contains the following goals and policies related to public services and utilities that are relevant to the Proposed Project and the 130-Unit Alternative.

Public Services Element

GOAL PS-1. Ensure that adequate public facilities services (APFS) and the infrastructure to support new development are provided over the life of this plan.

Policy PS-1.1. Adequate Public Facilities and Services (APFS) requirements shall:

a) Ensure that APFS needed to support new development are available to meet or exceed the level of service of "Infrastructure and Service Standards" (Table PS-1) concurrent with the impacts of such development.

b) Encourage development in infill areas where APFS are available, while acknowledging the rights of property owners to economically viable use of existing legal lots of record throughout the county.

Policy PS-1.3. No discretionary application for new development shall be approved unless the County finds that APFS for that use exist or will be provided concurrent with the development.

Policy PS-1.4. New development shall pay its fair share of the cost of providing APFS to serve the development.

Policy PS-1.6. Only those developments that have or can provide adequate public services and facilities shall be approved.

Goal PS-4. Ensure adequate treatment and disposal of wastewater.

Policy PS-4.5. New development proposed in the service area of existing wastewater collection, treatment, and disposal facilities shall seek service from those facilities unless it is clearly demonstrated that the connection to the existing facility is not feasible.

Goal PS-5. Maximize the amount of solid waste that is diverted from local landfills through recycling, composting and source reduction.

Policy PS-5.3. Programs to facilitate recycling/diversion of waste materials at new construction sites, demolition projects, and remodeling projects shall be implemented.

Policy PS-5.4. The maximum use of solid waste source reduction, reuse, recycling, composting, and environmentally-safe transformation of wastes, consistent with the protection of the public's health and safety, shall be promoted.

Policy PS-5.5. The County shall promote waste diversion and recycling and waste energy recovery as follows:

a) The County shall adopt a 75% waste diversion goal.

b) The County shall support the extension of the types of recycling services offered (e.g., to include food and green waste recycling).

c) The County shall support waste conversion and methane recovery in local landfills to generate electricity.

d) The County shall support and require the installation of anaerobic digesters or equivalent technology for wastewater treatment facilities.

Policy PS-5.6. The County will review its Solid Waste Management Plan on a five (5) year basis and institute policies and programs as necessary to exceed the wastestream reduction requirements of the California Integrated Waste Management Act. The County will adopt requirements for wineries to undertake individual or joint composting programs to reduce the volume of their wastestream. Specific mitigation measures to reduce the impacts of future solid waste facilities are infeasible because the characteristics of those future facilities are unknown.

Goal PS-6. Ensure the disposal of solid waste in a safe and efficient manner.

Policy PS-6.5. New development projects shall provide for handling of waste in a manner that conforms to State-mandated diversion and recycling goals. Site development plans shall include adequate solid waste recycling collection areas.

Policy PS-7.8. New development shall assist in land acquisition and financial support for school facilities, as required by state law. Where school districts have adopted appropriate resolutions, written confirmation from the school district that applicable fees and contributions have been paid or are ensured to the satisfaction of the district shall be required prior to the issuance of building permits. The County shall, as a condition of approval of development projects, require the project applicant to pay the fees required by statute (Government Code section 65996, as it may be periodically amended) to mitigate the impact of the proposed development on school facilities.

Safety Element

Policy S-4.11. The County shall require all new development to be provided with automatic fire protection systems (such as fire breaks, fire-retardant building materials, automatic fire sprinkler systems, and/or water storage tanks) approved by the fire jurisdiction.

Policy S-4.13. The County shall require all new development to have adequate water available for fire suppression. The water system shall comply with Monterey County Code Chapter 18.56, NFPA Standard 1142, or other nationally recognized standard. The fire authority having jurisdiction, the County Departments of Planning and Building Services, and all other regulatory agencies shall determine the adequacy and location of water supply and/or storage to be provided.

Policy S-4.14. Water systems constructed, extended, or modified to serve a new land use or a change in land use or an intensification of land use, shall be designed to meet peak daily demand and recommended fire flow.

Policy S-4.15. All new development shall be required to annex into the appropriate fire district. Where no fire district exists, project applicants shall provide verification from the most appropriate local fire authority of the fire protection services that exist. Project approvals shall require a condition for a deed restriction notifying the property owner of the level of service available and acceptance of associated risks to life and property. Where annexations are mandated, the County shall negotiate a tax share agreement with the affected fire protection district.

Policy S-4.18. All access roads and driveways shall be maintained by the responsible parties to ensure the fire department safe and expedient passage at all times.

Policy S-4.19. Gates on emergency access roadways shall be constructed in accordance with Monterey County Code Chapter 18.56 and the California Fire Code as amended.

Policy S-4.20. Reduce fire hazard risks to an acceptable level by regulating the type, density, location, and/or design and construction of development.

Policy S-4.21. All permits for residential, commercial, and industrial structural development (not including accessory uses) shall incorporate requirements of the fire authority having jurisdiction.

Policy S-4.22. Every building, structure, and/or development shall be constructed to meet the minimum requirements specified in the current adopted state building code, state fire code, Monterey County Code Chapter 18.56, and other nationally recognized standards.

Policy S-4.31. A zone that can inhibit the spread of wildland fire shall be required of new development in fire hazard areas. Such zones shall consider irrigated greenbelts, streets, and/or Fuel Modification Zones in addition to other suitable methods that may be used to protect development. The County shall not preclude or discourage a landowner from modifying fuel within the Fuel Modification Zone, or accept any open space easement or other easement over land within a Fuel Modification Zone that would have that effect.

Policy S-4.32. Property owners in high, very high, and extreme fire hazard areas shall prepare an overall Fuel Modification Zone plan in conjunction with permits for new structures, subject to approval and to be performed in conjunction with the CDFFP and/or other fire protection agencies in compliance with State Law.

Policy S-4.33. Where new developments are required to provide for fuel modification zones, the cost of such construction shall be borne by the developer. Future maintenance of such fuel modification zones shall be in accordance with the fire defense standards adopted by the State of California. Homeowners shall be responsible for said maintenance.

Policy S-5.9. Emergency roadway connections may be developed where distance to through streets is excessive, or where a second means of emergency ingress or egress is critical. New residential development of three units or more shall provide more than one access route for emergency response and evacuation unless exempted by the Fire jurisdiction. Such protection requirements shall be consistent with adopted fire safety standards.

Policy S-5.17. Emergency Response Routes and Street Connectivity Plans shall be required for Community Areas and Rural Centers, and for any development producing traffic at an equivalent or greater level to five or more lots/units. Said Plan shall include:

a) Roadway connectivity that provides multiple routes for emergency response vehicles.

b) Primary and secondary response routes in Community Areas and Rural Centers.

c) Secondary response routes, which may include existing roads or new roads required as part of development proposals.

The County shall review said plans in coordination with the appropriate Fire District.

Policy S-6.7. Public safety measures, including sequential house numbering, non-repetitive street naming, standardized lettering of house numbers in subdivision design, lighting, and park designs, that allow for adequate view from streets shall be included in the design and construction of new development.

2013 Carmel Valley Master Plan

The 2013 CVMP was enacted as part of the County 2010 General Plan and is intended to guide future land use within the 2013 CVMP plan area boundary. Specifically the plan area boundary is defined as "the primary watershed of the Carmel River from SR 1 to just east of Carmel Valley Village, except for the upper reaches of Garzas Creek and Robinson Canyon." (Monterey County 2010) Key 2013 CVMP public services and utilities policies and regulations relevant to the Proposed Project and the 130-Unit Alternative are noted below.

Conservation/Open Space

CV-3.14: Wherever possible a network of shortcut trails and bike paths should interconnect neighborhoods, developments, and roads. These should be closed to motor vehicles and their intent is to facilitate movement within the Valley without the use of automobiles.

CV-3.19: As development of bike paths and a coordinated, area-wide trails system are essential for circulation, safety, and recreation in the Carmel Valley Planning Area, dedication of trail easements may be required as a condition of development approval, notwithstanding Policy OS-1.10(b).

Safety

CV-4.3: In addition to required on-site improvements for development projects, a fee shall be imposed to help finance the improvement and maintenance of the drainage facilities identified in the Drainage Design Manual for Carmel Valley.

CV-4.4: The County shall require emergency road connections as necessary to provide controlled emergency access as determined by appropriate emergency service agencies (Fire Department, OES). The County shall coordinate with the emergency service agencies to periodically update the list of such connections.

Public Services

CV-5.3: Development shall incorporate designs with water reclamation, conservation, and new source production in order to:

a. maintain the ecological and economic environment;

b. maintain the rural character; and

c. create additional water for the area where possible including, but not limited to, on-site stormwater retention and infiltration basins.

CV-5.4: The County shall establish regulations for Carmel Valley that limit development to vacant lots of record and already approved projects, unless additional supplies are identified. Reclaimed water may be used as an additional water source to replace domestic water supply in landscape irrigation and other approved uses provided the project shows conclusively that it would not create any adverse environmental impacts such as groundwater degradation.

Prior County Plans and Policies

As stated in Chapter 1, *Introduction*, discussion pertaining to the 1982 General Plan is provided for informational purposes only.

1982 Monterey County General Plan

The 1982 *Monterey County General Plan* (1982 General Plan) was adopted by the Board of Supervisors in 1982 and, when in effect, was periodically amended until it was superseded by the adoption of the County's 2010 General Plan. The 1982 General Plan provides general direction for future growth throughout the unincorporated areas of the County. The 1982 General Plan's objective is to promote balanced growth throughout the County in a manner that protects the County's natural resources.

General Land Use

Policy 26.1.4: The County shall designate growth areas only where there is provision for an adequate level of services and facilities such as water, sewage, fire and police protection, transportation, and schools. Phasing of development shall be required as necessary in growth areas in order to provide a basis for long-range services and facilities planning.

Policy 26.1.4.3: A standard tentative subdivision map and/or vesting tentative and/or Preliminary Project Review Subdivision map application for either a standard or minor subdivision shall not be approved until

- the applicant provides evidence of assured long-term water supply in terms of yield and quality for all lots which are to be created through subdivision. A recommendation on the water supply shall be made to the decision making body by the County's Health Officer and the General Manager of the Water Resources Agency, or their respective designees
- the applicant provides proof that the water supply to serve the lots meets both the water quality and quantity standards as set forth in Title 22 of the California Code of Regulations and Chapters 15.04 and 15.08 of the Monterey County Code subject to review and recommendation by the County's Health Officer to the decision making body.

Residential

Goal 27: to encourage various types of residential development that are accessible to major employment centers and at locations and densities which allow for the provision of adequate public services and facilities.

Open Space

Policy 34.1.3: Wherever possible, open space lands provided as part of a development project should be integrated into an areawide open space network.

1986 Carmel Valley Master Plan

The 1986 *Carmel Valley Master Plan* (1986 CVMP) is a component of the 1982 General Plan. The major function of the 1986 CVMP is to guide the future development of the valley using goals and policies that reflect an understanding of the physical, cultural and environmental setting of the area.

Environmental Constraints

17.4.1.1 (CV): The potential for wildland fires in the valley must be recognized in development proposals and adequate mitigation measures incorporated in the designs.

17.4.1.2 (CV): All proposed developments, including existing lots of record shall be evaluated by the appropriate fire district prior to the issuance of building permits. The recommendations of the fire district shall be given great weight and should, except for good cause shown, ordinarily be followed.

17.4.15 (CV): In high and very high fire hazard areas, as defined by the California Department of Forestry and shown on California Department of Forestry Fire Hazard Maps, roof construction (except partial repairs) of fire retardant materials, such as tile, asphalt or asbestos combination, or equivalent, shall be required as per Section 3203 (e) (excluding 11) of the Uniform Building Code, or as approved by the fire district. Exterior walls constructed of fire resistant materials are recommended but not required. Vegetation removal will not be allowed as a means of removing high or very high fire hazard designation from an entire parcel.

General Land Use

26.1.22 (CV): Developed areas should be evaluated in light of resource constraints especially the water supply constraint addressed by policy 54.1.7 (CV) and the character of each area. No further development in such areas shall be considered until a need is demonstrated through public hearings.

Public Services and Facilities

51.2.11 (CV): Active neighborhood recreation areas should be located at or within close access to the three development areas.

- All valley residents should have nearby access to hiking and riding trails and small neighborhood open areas or parks.
- Even though the Master Plan area contains two large regional parks, there should be constant consideration of the acquisition of additional areas. Land on the south side of the valley near the village is highly suitable for a mixture of active and passive uses, and should be seriously considered in conjunction with growth around the village area.

54.1.5 (CV): Development shall be limited to that which can be safely accommodated by on-site sewage disposal, or in the case of the Lower Valley, by the Carmel Sanitary District. Consideration may be given to package plants operated under supervision of a county service district.

54.1.6 (CV): When projects for low/moderate income owners or renters are proposed at densities exceeding those recommended by the wastewater application rates of the Wastewater Study, but not exceeding 40 grams/acre/day of total nitrogen, a detailed wastewater study acceptable to the Director of Environmental Health shall be required to determine whether the recommendations of the Wastewater Study should be relaxed or upheld, and the policies of the Basin Plan, Monterey County Code (Septic System Ordinance), and other applicable health requirements will be met.

Monterey Peninsula Water Management District

The MPWMD manages the production of water from two sources: surface water from the Carmel River stored in San Clemente and Los Padres Reservoirs; and ground water pumped from municipal and private wells in Carmel Valley and the Seaside Coastal Area.

The MPWMD's legislated function is as follows:

- Augment the water supply through integrated management of ground and surface water resources
- Promote water conservation
- Promote water reuse and reclamation of storm and wastewater
- Foster the scenic values, environmental quality, native vegetation, fish and wildlife, and recreation on the Monterey Peninsula and in the Carmel River basin.

All Water Distribution Systems (WDS) within the District, ranging from large systems such as Cal-Am in the EIR) to small systems such as one well serving a single-family parcel, are regulated by MPWMD. The MPWMD requires a WDS permit to create or amend a WDS, and also requires a Water Permit to serve connections within a system, such as new homes to be constructed in a subdivision. A valid permit from MPWMD is needed before a Monterey County building permit is issued. All wells within the District boundary are regulated by MPWMD.

Issuance of a permit to create or amend a WDS requires Findings of Approval supported by written evidence, compliance with minimum standards of approval, and mandatory Conditions of Approval, pursuant to MPWMD Rules 22-B, C and D. An applicant must show that the source of supply can reliably meet the water needs of the project, would not adversely impact existing systems, and would not adversely impact the environment.

Wells within the Cannel Valley Alluvial Aquifer (CVAA) are subject to more stringent review due to federal and state Endangered Species Act issues. Wells within the CVAA must also demonstrate adequate water rights as the CVAA is within the jurisdiction of the State Water Board.

Monterey County Department of Environmental Health

The mission of the Monterey County Department of Environmental Health (MCDEH) is to prevent environmental hazards from occurring and to protect the public and resources from environmental hazards when they occur. The agency is responsible for water well permits for construction, destruction and modification as well as to inspect placement of sanitary seal. They also conduct inspections, issue permits and monitor chemical and bacteriological water quality for small public water systems with less than 200 connections.

Impact Analysis

Methods of Analysis

The impact analysis included review of the following documents and determination of impacts on public services and utilities related to the project site: 2010 General Plan; information provided by Project Applicant; service providers' web sites; information supplied by service providers; and other research sources.

Criteria for Determining Significance

In accordance with CEQA, State CEQA Guidelines, 2010 Monterey County General Plan plans and policies, 2013 CVMP plans and policies, and agency and professional standards, a project impact would be considered significant if the project would:

A. Fire and Police Services

- Result in substantial increased demands to maintain acceptable service ratios, response times, or other performance objectives related to fire or police services, which would require new or expanded facilities to maintain acceptable provision of service or result in inadequate emergency access.

B. Emergency Access

- Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

C. Wildland Fire Hazard

- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

D. Water Demand

- Result in a water demand that exceeds water supplies available to serve the project from existing entitlements and resources, and/or require new or expanded supplies.

E. Infrastructure Capacities

- Result in water demand that exceeds capacity of the water supply infrastructure system; or would require substantial expansion of water supply, treatment, or distribution facilities, the construction of which could cause significant environmental effects.

F. Wastewater Treatment Capacity

- Result in wastewater flows that exceed sewer line or treatment plant capacity, or that contribute substantial increases to flows in existing sewer lines that exceed capacity.

G. Utility Disruption during Construction

- Result in prolonged or recurring disruption in the provision of services and utilities, including power, water, and sewer service to residences, businesses, or public service providers during construction of a project.

H. School Enrollments

- Result in increased student enrollments that would cause school capacities to be exceeded, or that would substantially increase existing overcrowding in schools, resulting in a need for new facilities.

I. Recreational Demand

- Increase the use of existing neighborhood and regional parks or other recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated or that new recreational facilities would need to be constructed and would result in secondary physical impacts to the environment.

J. Open Space

- Increase the use of existing open space such that substantial physical deterioration of the facility would occur or such that quality of the facility would diminish.

K. Landfill Capacity

- Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.

Impacts and Mitigation Measures

A. Fire and Police Services

Impact PSU-1: Increased Demand for Fire and First-Responder Emergency Medical Services (less than significant)

Proposed Project

The Proposed Project would increase demand for fire and first-responder emergency medical services. As discussed in the Fire Protection section above, the CFPD's Insurance Service Office Class 3 rating is expected to be reduced due to recent increase in personnel and current level of response. Therefore, the Proposed Project is not anticipated to change the service rations and response time in the project area. The extension of Rio Road would provide a direct access route to the project area and would minimize fire and first-responder emergency services response times to the area. The automatic aid agreement with Carmel–by-the-Sea, Pebble Beach Fire Station, and the Carmel Valley Fire Protection District also improve the ability to provide fire protection and first-responder medical emergency services to the project area.

The project design must comply with all applicable building code standards as well as any additional County, CVMP, and local fire district policies related to fire and emergency response. Implementation of these building code standards would ensure that impacts would be *less than significant*. No mitigation is required.

130-Unit Alternative

Similar to the Proposed Project, the 130-Unit Alternative, including Lot 130, would increase demand for fire and first-responder emergency medical services. However, the increased demand would be less than that of the Proposed Project due the reduction in proposed housing units from 281 to 130 in the 130-Unit Alternative.

As discussed in the *Fire Protection* section above, the CFPD's Insurance Service Office Class 3 rating is expected to be reduced due to recent increase in personnel and current level of response. The extension of Rio Road would provide a direct access route to the project area and would minimize

fire and first-responder emergency services response times to the area. The automatic aid agreement with the City of Carmel, Pebble Beach Fire Station, and the Carmel Valley Fire Protection District also improve the ability to provide fire protection and first-responder medical emergency services to the project area.

As with the Proposed Project, the 130-Unit Alternative, including Lot 130, project design must comply with all applicable building code standards as well as any additional County, CVMP, and local fire district policies related to fire and emergency response. Therefore, the 130-Unit Alternative potential impact on fire protection and first responder services would be *less than significant*. No mitigation is required.

Impact PSU-2: Increased Demand for Police Services (less than significant)

Proposed Project

The Proposed Project would increase demand for police services by increasing the number of permanent residents in Carmel Valley, an unincorporated area of Monterey County. The analysis assumes a total population of 849 persons at buildout of the Proposed Project.

The Monterey County Sheriff's Office requires each project applicant to satisfactorily comply with the Monterey County Public Safety and Security Guidelines, as well as with specific guidelines tailored to the project for both private and commercial development. Compliance with these guidelines would improve public safety and security of the Proposed Project.

The Monterey County Sheriff's Office strives to maintain a service standard of one deputy per 1,000 persons. The 2013/2014 ratio of deputies per residents was 1:1,320 (Galletti pers. comm.). This coupled with the increasing population of the area may lead to delayed response times for service calls (Galletti pers. comm.).

However, under CEQA, impacts related to police service only occur if the demand for police services would result in construction of new public facilities that would result in secondary physical impacts on the environment. This impact would be *less than significant*. No mitigation is required.

130-Unit Alternative

Similar to the Proposed Project, the 130-Unit Alternative would increase the population in Carmel Valley. At buildout, the 130-Unit Alternative would increase the population less than the Proposed Project due the reduction in proposed housing units from 281 to 130. Under CEQA, impacts related to police service only occurs if the demand for police services would result in construction of new public facilities that would result in secondary physical impacts on the environment. This impact would be *less than significant*. No mitigation is required.

B. Emergency Access

Impact PSU-3: Interference with Emergency Access Routes or Adopted Emergency Access Plans (less than significant)

Proposed Project

The area is currently a golf course and does not provide emergency access routes or trails for CFPD or the Sheriff's Department. Furthermore, the future residents of the proposed development would have 2 separate access/exit routes available in the event of an emergency.

The most common event requiring evacuation in the extended project area is the periodical flooding of the Carmel River. The residential site would be located above the 100-year flood zone, and thus would be unaffected during evacuations of this nature. In addition, risk of fire is low (see Impact PSU-4 below) in the area surrounding the project site. However, if a 500-year flood event should occur, the Carmel Valley Road, Rio Road west, and Rio Road east exits would suffice to serve area residents during evacuation. Thus, the Proposed Project would have a *less-than-significant* impact on adopted emergency response or evacuation plans. No mitigation is required.

130-Unit Alternative

The 130-Unit Alternative site is currently a golf course and does not provide emergency access routes or trails for CFPD or the Sheriff's Department. Furthermore, the future residents of the proposed development on the western golf course would have two separate access/exit routes available in the event of an emergency. The portion of Rio Road west of the project site would be used for emergency, bicycle, and pedestrian access only. Rio Road would be extended from the east southwest across the site to meet up with the emergency access section of Rio Road extending to the west. Access to Lot 130 would be from Carmel Valley Road. The existing access to this site would not change.

Similar to the Proposed Project, the most common event requiring evacuation in the extended project area is the periodical flooding of the Carmel River. The main residential site and Lot 130, would be located above the 100-year flood zone, and thus would be unaffected during evacuations of this nature. In addition, risk of fire is low in the area surrounding the 130-Unit Alternative (see Impact PSU-4, below). However, if a 500-year flood event should occur, the Carmel Valley Road, Rio Road west, and Rio Road east exits would suffice to serve area residents during evacuation. Thus, the 130-Unit Alternative would have a *less-than-significant* impact on adopted emergency response or evacuation plans. No mitigation is required.

C. Wildland Fire Hazard

Impact PSU-4: Expose People or Structures to a Significant Risk of Loss, Injury, or Death Involving Wildland Fires (less than significant)

Proposed Project

The Proposed Project would be situated in an area that is currently developed as a golf course. The general area encompassing the project site is not located in a Very High Fire Hazard Severity Zone according to the California Department of Forestry and Fire Protection (California Department of Forestry and Fire Protection 2007). Development exists to the west and east of the parcel and a

major road bounds the northern portion. To the south runs the Carmel River and beyond that exists the Palo Corona Ranch open space. The MPRPD and Big Sur Land Trust acquired the open space area in 2004 and portions of it are developed for public recreation. In addition, the habitat preserve and nature trails incorporated into the project design would provide a buffer zone along the north bank of the Carmel River separating the housing development from the open space.

While the Proposed Project would be located across the river from an open space area, it would not significantly increase the risk of loss, injury, or death involving people or structures resulting from wildfires. This impact would be *less than significant.* No mitigation is required.

130-Unit Alternative

Similarly to the Proposed Project, the 130-Unit Alternative, would be situated in an area that is currently developed as a golf course. Lot 130 is developed with existing maintenance facility structures. The general area encompassing the 130-Unit Alternative site, including Lot 130, is not located in a Very High Fire Hazard Severity Zone according to the California Department of Forestry and Fire Protection (California Department of Forestry and Fire Protection 2007). Development exists to the west and east of the 130-Unit Alternative site and a major road bounds the northern portion. To the south runs the Carmel River and beyond that exists the Palo Corona Ranch open space. The MPRPD and Big Sur Land Trust acquired the open space area in 2004 and portions of it are developed for public recreation. In addition, the habitat preserve and nature trails incorporated into the project design would provide a buffer zone along the north bank of the Carmel River separating the housing development from the open space.

While the 130-Unit Alternative would be located across the river from an open space area, it would not significantly increase the risk of loss, injury, or death involving people or structures resulting from wildfires. This impact would be *less than significant.* No mitigation is required.

D. Water Demand

Impact PSU-5: Increased Water Supply Demand (less than significant)

Baseline for Impact Analysis

In order to assess water supply impacts, an existing use baseline must be established. The existing golf courses use between 309 and 522 AFY for irrigation (based on 1991 to 2014 data shown in **Table 3.10-3**), with an average use of 410 AFY. The Project will result in the elimination of one of the two Rancho Cañada golf courses and the baseline is considered to be 50% of the current golf course irrigation use which on average would be about 205 AFY. Current baseline use depends on climatic factors and is estimated to range from 164 to 256 AFY, depending on precipitation (**Table 3.10-4**). Most irrigation occurs during the drier parts of the year (April through October) and thus a large portion of the irrigation on the golf course (likely in excess of 80%) is consumed by the golf turf through evaporation and transpiration (referred to as evapotranspiration).

Table 3.10-4. Baseline Water Use on Rancho Cañada Project Site (acre-feet)

	Average Year	Wet Year (80% avg.)	Dry Year (110% avg.)	Very Dry Year (125% avg.)
Irrigation	204.8	163.8	225.3	256.0

Notes:
Baseline use is assumed to be the water use of one of the two golf courses on-site because with the Project, only one golf course will remain in operation.

Proposed Project

ICF developed water demand estimates for different types of housing units using MPWMD fixture unit methodology (**Table 3.10-5**). ICF then prepared a demand estimate using these estimates and conservative use assumptions (**Table 3.10-6**) that estimates average project demand as 115 AFY including treatment and system transmission losses. The ICF estimate was used for the EIR analysis. Accounting for precipitation variation, project use is estimated to range from 92 to 143 AFY (**Table 3.10-5**).

Based on these estimates, there would be a net reduction in water use ranging from 72 to 113 AFY, with an average of 90 AFY (**Table 3.10-7**). This estimate is based on conservative assumptions for demand, treatment, and system losses, and may understate the amount of the net reductions. Further, the same percentage adjustments were made to the baseline use case for golf course irrigation for wet, dry, and very dry years as for the Project residential demand. Residential demand, particularly for the proposed residential development which has relatively compact development and limited yards would vary far less than golf course irrigation and thus, in dry and very dry years, the estimated Project demand is likely higher than it will actually be.

Given the existing impact of Cal-Am withdrawals on the Carmel River, this net reduction is a beneficial impact for both water supply and for biological resources in the river, such as steelhead. In addition, wastewater would be conveyed to the Carmel Area Wastewater District's (CAWD) water recycling plant for eventual release into the Carmel Valley Lagoon. Presently, during the summer and fall months the lagoon waters are at critically low levels, which jeopardize the lagoon's steelhead populations. With additional wastewater flows, such as those from the Rancho Cañada Village Project, CAWD would have increased opportunity to release more wastewater. Therefore, the Project would provide environmental benefits to the steelhead habitat.

The water source for the Project would be the on-site wells using water rights held by the property, as described above, or a connection to Cal-Am facilitated by dedication of an appropriate amount of the Project Applicant's water right to Cal-Am. The state has reserved 700 AFY for allocation to the Rancho Cañada property, of which 545 AFY remain which exceeds the amount needed for golf course irrigation and the Project.

Table 3.10-5. Water Demand by Housing Type

		Condo		Townhouse		SFR- Small		SFR-Medium		SFR-Large	
Type of Fixture	FU Value	No.	FU Count	No.	FU Count	No.	FU Count	No.	FU Count	No.	FU Count
Wash Basins (lavatory sink) each	1.0	2	2.0	2	2.0	3	3.0	3	3.0	4	4.0
Two washbasins in Master Bathroom	1.0									1	1.0
Toilet (ULF, 1.6 gpf)	1.8	2	3.6	2	3.6	3	5.4	3	5.4	4	7.2
Toilet (HET, 1.3 gpf)	1.3										
Toilet (UHET, 0.8 gpf)	0.8										
Masterbath (Tub, sep. shower)	3.0		0.0		0.0		0.0	1	3.0	1	3.0
Large bathtub (w/ showerhead)	3.0									1	
Standard bathtub (w/ showerhead)	2.0	1	2.0	2	4.0	2	4.0	2	4.0	2	4.0
Shower, separate stall	2.0		0.0		0.0		0.0		0.0		0.0
Kitchen sink and dishwasher	2.0	1	2.0	1	2.0	1	2.0	1	2.0	2	4.0
Kitchen sink and HE dishwasher	1.5										
Laundry/utility sink	2.0		0.0		0.0	1	2.0	1	2.0	2	4.0
Washing Machine	2.0	1	2.0	1	2.0	1	2.0	1	2.0	1	2.0
Washing Machine (HEW, WF 5 or less)	1.0										
Bidet	2.0		0.0		0.0		0.0		0.0		0.0
Bar sink	1.0		0.0		0.0		0.0		0.0		0.0
Entertainment sink	1.0									1	1.0
Vegetable sink	1.0		0.0		0.0		0.0		0.0		0.0
Subtotal Interior Fixture Units			*11.6*		*13.6*		*18.4*		*21.4*		*30.2*
Landscaping (Interior FUs X 0.5)			*5.8*		*6.8*		*9.2*		*10.7*		*15.1*
Swimming Pools (per 100 SF)	1.0		0.0		0.0		0.0		0.0	4.5	4.5
Fixture Unit Count			*17.4*		*20.4*		*27.6*		*32.1*		*49.8*
Acre-Feet/Unit (0.01 AF/FU)			0.17		0.20		0.28		0.32		0.50
Prepared by ICF using MPWMD Fixture Unit Methodology. All Assumptions by ICF											

Table 3.10-6. Rancho Cañada Village Estimated Water Demand/Use (by ICF)

	Units	AF/Unit	Total
Housing			
Condominiums	35	0.17	6.1
Townhouses	64	0.20	13.1
Small Lot Single Family	67	0.27	18.5
Medium Lot Single Family	114	0.32	36.6
Large Lot Single Family	1	0.50	0.5
Housing Subtotal	*281*		*74.7*
Active Park	2.6	2.5	6.5
Landscape Parkways	3.3	2.5	8.3
Landscape Total			*14.8*
Residential Element Subtotal			89.5
Treatment (15%) and System (7%) Loss			18.7
Average Year Direct Water Demand			**114.7**
Wet Year (80% of avg.)			*91.8*
Dry Year (110% of avg.)			*126.2*
Very Dry Year (125% of avg.)			*143.4*

Table 3.10-7. Rancho Cañada Village Water Impact (Acre-Feet)

	Baseline Use	Project Use	Net Change
Average Year	204.1	114.7	-90.1
Wet Year	163.3	91.8	-72.0
Dry Year	224.5	126.2	-99.1
Very Dry Year	255.1	143.4	-112.6

Note: This estimate is based on conservative assumptions described in text and may underestimate the amount of net reduction.

Water for the new homes would be supplied either through the Cal-Am distribution system by assigning a portion of Rancho Cañada's water rights to Cal-Am for delivery back to the development, or though the creation of independent community services (private or public), contract or dedication to use the existing Rancho Cañada wells to pump, treat, and purvey the amount of water necessary for the Project. Reduction in water use would be documented through the meters on the wells which are already in place as required by ordinance with MPWMD.

Because the Proposed Project would result in an overall reduction in water use, this impact would be *less than significant*. No mitigation is necessary. Infrastructure impacts related to a potential new water system are discussed below separately.

The following are recommended as conditions of approval to ensure impacts remain less than significant:

- (1) Require a permanent dedication of 143 AF of the Project Applicant's water right that reserves its use solely for the Rancho Cañada Village residential development (including the

park and preserve) and precludes any future use of this amount by the Project Applicant for golf course irrigation, other use, or transfer. This amount is based on the estimated net demand during a very dry year indicated in **Table 3.10-7**.

- (2) It is thus further recommended that the County, as a condition of approval, require monthly reporting of water use on the golf course to verify that water use does not exceed the estimated remaining amount of the Project Applicant's water right (402 AF). This amount was determined by subtracting the 143 AF dedication for Rancho Cañada Village from the 545 AFY remaining site appropriation. Based on historic data this appears to be more than adequate for these uses.

130-Unit Alternative

ICF then prepared a demand estimate for the 130-Unit Alternative using the housing type water demand estimates from **Table 3.10-5** and conservative use assumptions. With the restrictions in water supply at present, the dedication amount can serve as a hard limit on potential water use. As shown in **Table 3.10-8** below, this Alternative would result in a water demand of 130 AFY including 60 AFY proposed for transfer to other Cal-Am uses. The ICF estimate is used for the EIR analysis. Accounting for precipitation variation, Project use is estimated to range from 104 to 162 AFY (**Table 3.10-8**).

Table 3.10-8. 130-Unit Alternative Estimated Water Demand/Use (by ICF)

	Units	AF/Unit	Total
Housing			
Condominiums	12	0.17	2.1
Small Lot Single Family	110	0.28	30.4
Medium Lot Single Family	7	0.32	2.2
Large Lot Single Family	1	0.50	0.5
Housing Subtotal	*130*		*35.2*
Open Space Irrigation	7.7	2.5	19.3
Residential Element Subtotal			54.4
Treatment (15%) and System (7%) Loss			15.4
Average Year Direct Water Demand			**69.8**
Wet Year (80% of avg.)			*55.8*
Dry Year (110% of avg.)			*76.8*
Very Dry Year (125% of avg.)			*87.2*
Water Transfer to Other Cal-Am Users			*60.0*
Net Water Demand (Average Year)			***129.8***
Wet Year (80% of avg.)			*103.8*
Dry Year (110% of avg.)			*142.8*
Very Dry Year (125% of avg.)			*162.3*
Dedication for Instream Purposes (based on average year)			50.2
Water Demand + Instream Dedication (based on average year)			**180.0**

Based on these estimates (excluding the instream dedication), there would be a net reduction in water use ranging from 60 to 93 AFY, with an average of 74 AFY (**Table 3.10-9**). This estimate is based on conservative assumptions for demand, treatment, and system losses, and may understate the amount of the net reductions. Further, the same percentage adjustments were made to the

baseline use case for golf course irrigation for wet, dry, and very dry years as for the Project residential demand. Residential demand, particularly for the proposed residential development which has relatively compact development and limited yards would vary far less than golf course irrigation and thus, in dry and very dry years, the estimated Project demand is likely higher than it will actually be.

Similar to the Proposed Project, given the existing impact of Cal-Am withdrawals on the Carmel River, this net reduction is a beneficial impact for both water supply and for biological resources in the river, such as steelhead.

Table 3.10-9. 130-Unit Alternative Water Impact (acre-feet)

	Baseline Use	Project Use	Net Change
Average Year	204.1	129.8	-74.3
Wet Year	163.3	103.8	-59.5
Dry Year	224.5	142.8	-81.7
Very Dry Year	255.1	162.3	-92.8

Note: This estimate is based on conservative assumptions described in text and may underestimate the amount of net reduction. Project use does not include presumed dedication of 50 AFY for stream purposes.

Because the 130-Unit Alternative would result in an overall reduction in water use, this impact would be *less than significant*. No mitigation is necessary. Infrastructure impacts related to a potential new water system are discussed below separately.

The following are not mitigation measures, but recommended as conditions of approval to ensure impacts remain less than significant:

- It is recommended that the County, as a condition of approval, require a permanent dedication of 87 AF of the Project Applicant's water right that reserves its use solely for the 130-Unit Alternative residential development (including the park and preserve) and precludes any future use of this amount by the Project Applicant for golf course irrigation, other use, or transfer. This amount is based on the estimated net demand during a very dry year indicated in **Table 3.10-8**.
- It is thus further recommended that the County, as a condition of approval, require monthly reporting of water use on the golf course to verify that water use does not exceed the estimated remaining amount of the Project Applicant's water right. Combining the 130-Unit residential dedication (87 AFY) with the water transfer to other Cal-Am users (60 AFY), and the instream dedication (50 AFY using the estimate above), the total dedicated would be 197 AFY. From the 545 AFY remaining portion of the site's appropriation, this would leave up to 348 AFY for use for the remaining golf course and the clubhouse. Based on historical data, this appears adequate to cover these remaining uses.

E. Infrastructure Capacities

Impact PSU-6: Increased Demand for Water and Sewer Infrastructure (less than significant with mitigation)

Proposed Project

The Proposed Project would increase demand for sewer capacity. This increase in demand can be met by existing sewer lines and treatment facilities (see discussion under Impact PSU-7 below). The Proposed Project would add additional lines to existing infrastructure. Impacts on an increased demand for sewer capacity are *less than significant* and no mitigation is required.

As described above in Impact PSU-5, water for the new homes would be supplied either through the Cal-Am distribution system or though the creation of independent community services (public or private), contract, or dedication to use the existing Rancho Cañada wells to pump, treat, and purvey the amount of water necessary for the Project. The Project Applicant has identified the location of the treatment facilities as within the 2 acre park, and the wells are on-site so the pipeline routing would likely be across the golf course and through the residential development. While treatment facilities are likely to be necessary, the extent of the treatment facilities is likely limited in character and size and would not substantially change the character of the park facility, increase the footprint of disturbance, or be particularly noticeable.

It is probable that the existing wells would provide suitable potable water because Cal-Am utilizes a potable water supply well on the golf course and the water from the Project Applicant's wells is likely to be of similar quality to the Cal-Am well. However, groundwater withdrawals for water supply in the lower portion of the Carmel River basin must be treated for iron and manganese prior to distribution (EIP Associates 1993). Thus, it is expected that some treatment facilities may be necessary as well as pipelines and pumping to transport treated water to the residential area. This is considered a *potentially significant* impact. Implementation of **Mitigation Measures PSU-1** would reduce this impact to a *less-than-significant* level.

130-Unit Alternative

Similar to the Proposed Project, the 130-Unit Alternative would increase demand for sewer capacity. The 130-Unit Alternative would have a smaller increase in demand than the Proposed Project. This increase in demand can be met by existing sewer lines and treatment facilities (see discussion under Impact PSU-7 below). The 130-Unit Alternative, including Lot 130, lots would add additional lines to existing infrastructure. Impacts on an increased demand for sewer capacity are *less than significant* and no mitigation is required.

As described above, for the Proposed Project and in Impact PSU-5, water for the new homes would be supplied either through the Cal-Am distribution system or though the creation of independent community services (public or private), contract, or dedication to use the existing Rancho Cañada wells to pump, treat, and purvey the amount of water necessary for the Project or 130-Unit Alternative.

As discussed above for the Proposed Project, it is probable that the existing wells would provide suitable potable water because Cal-Am utilizes a potable water supply well on the golf course and the water from the Project Applicant's wells is likely to be of similar quality to the Cal-Am's well. However, groundwater withdrawals for water supply in the lower portion of the Carmel River basin

must be treated for iron and manganese prior to distribution (EIP Associates 1993). Thus, it is expected that some treatment facilities may be necessary as well as pipelines and pumping to transport treated water to the residential area. This is considered a *potentially significant* impact. Implementation of **Mitigation Measures PSU-1** would reduce this impact to a *less-than-significant* level.

Mitigation Measure PSU-1: Test Well Supply, Identify Water Treatment and Distribution Facilities, and Avoid Impacts on Biological Resources

Prior to construction, the Project Applicant or its contractor will test the proposed water supply for the Project (or 130-Unit Alternative) for California Title 22 constituents for potable water supply and will design and fund any necessary treatment and distribution facilities needed to transport treated water to the project site. Testing results will be provided to the County. The design for the new facilities will be submitted to Monterey County for review and approval. The new facilities can be placed within the existing golf course and/or other non-habitat disturbed areas (such as existing roads or golf paths). Under no circumstances will the new facilities result in permanent loss of native vegetation, ponds, or wetlands. All biological mitigation described for the Project (or 130-Unit Alternative) will apply to any potential impacts of new facilities. No grading for the Proposed Project (or 130-Unit Alternative) will be allowed until the new facilities have been approved by Monterey County and all biological resource mitigation has been approved by the County, USFWS, and CDFW. The Project Applicant will be required to fund all necessary improvements. This mitigation also applies to any new facilities required if the Project (or 130-Unit Alternative) utilizes a connection to the Cal-Am distribution system.

F. Wastewater Treatment

Impact PSU-7: Increased Wastewater Treatment Capacities (less than significant)

Proposed Project

The Proposed Project would increase wastewater flows to the CAWD treatment facility. A 12-inch sanitary sewer trunk exists adjacent to the project area from which additional connections would be made to serve the project area. Increased wastewater flow from the residential development is estimated to range from an average dry weather flow of 84,900 gallons per day (gpd), up to a peak wet weather flow of 280,170 gpd. Currently, the CAWD treatment plant is operating at 50% below permitted capacity and has remaining capacity of approximately 1.6 million gpd (Carmel Area Wastewater District 2014).

Increased flows resulting from the Proposed Project would not exceed the CAWD treatment facility's permitted facility or substantially decrease the ability of the plant to treat existing flows (Buikema pers. comm.). Thus, the treatment of this increased capacity would have a *less-than-significant* impact. No mitigation is required.

130-Unit Alternative

The 130-Unit Alternative would increase wastewater flows to the CAWD treatment facility. A 12-inch sanitary sewer trunk exists adjacent to the project area from which additional connections would be made to serve the project area. It is assumed all water used for residential development would be discharged to the wastewater system. Scaling down from the Proposed Project estimates, increased wastewater flow from the 130-Unit residential development and Lot 130, is estimated to

range from 39,000 gpd (average dry weather flow) to 130,000 gpd (wet weather flow). Currently, the CAWD treatment plant is operating at 50% below permitted capacity with approximately 1.6 million gpd remaining capacity. Increased flows resulting from the 130-Unit Alternative (including residential uses) would not exceed the CAWD treatment facility's permitted facility or substantially decrease the ability of the plant to treat existing flows (Buikema pers. comm.). Thus, the treatment of this increased capacity would have a *less-than-significant* impact. No mitigation is required.

G. Utility Disruption during Construction

Impact PSU-8: Construction-Related Service Disruptions (less than significant with mitigation)

Proposed Project

Much of the water and sewage infrastructure is in place nearby. Sewer line connections would occur along the main trunk to efficiently serve the development. New water facilities may be required to supply the required fire protection and water pressure for homeowner use. However, this would not affect water service to other areas because the water supply originates from an onsite well. Furthermore, new utility connections for power and communications would be necessary to serve the development.

Project development, installation of the infrastructure noted above, and road improvements could disrupt existing utility lines. This impact would be *potentially significant.* Implementation of **Mitigation Measures PSU-2** would reduce this impact to a *less-than-significant* level.

130-Unit Alternative

As discussed for the Proposed Project, much of the water and sewage infrastructure is in place nearby. Sewer line connections would be located along the main trunk to efficiently serve the development. New water facilities may be required to supply the required fire protection and water pressure for homeowner use. However, this would not affect water service to other areas because the water supply originates would be diverted from an existing well or rehabilitated well(s) located onsite. A pipeline from the existing or new well to the nearby Cal-Am water distribution system would be constructed. Furthermore, new utility connections for power and communications would be necessary to serve the development.

Development of the 130-Unit Alternative and road improvements, could disrupt existing utility lines. This impact would be *potentially significant*. Implementation of Mitigation Measure PSU-2 would reduce the impact to a *less-than-significant* level.

Mitigation Measure PSU-2: Coordinate with Appropriate Utility Service Providers and Related Agencies to Reduce Service Interruptions

Prior to construction, the Project Applicant or its contractor will coordinate with the appropriate utility service providers and related agencies to avoid or reduce service interruptions. This coordination would include the following.

- The Project Applicant or its contractor will contact the Underground Service Alert (800/642-2444) at least 48 hours before excavation work begins to verify the nature and location of existing underground utilities. The Project Applicant will also notify all public

and private utility owners at least 48 hours prior to the commencement of work adjacent to any existing utility, unless the excavation permit specifies otherwise.

- The Project Applicant or its contractor will coordinate with the remaining sections of the Rancho Cañada Golf Club and the CFPD to minimize or eliminate potential water interruption. Such coordination efforts may include requiring the construction contractor to "hot-tap" existing water lines for new waterline connections when possible to maintain service of existing water lines, and isolate construction areas and back feed water through alternate lines to provide continuous use.
- The Project Applicant or its contractor will coordinate with CAWD to minimize or eliminate potential interruptions of service when connections are made between existing and new sewer lines. Efforts may include coordination with the construction contractor to bypass sewage flows in the affected areas through use of portable pipeline that connects to unaffected sewage lines.

H. School Enrollments

Impact PSU-9: Increased Student Enrollments (less than significant)

Proposed Project

The Proposed Project could potentially increase student enrollments within the CUSD. A conservative multiplying factor of 0.18 students per household was used to determine the potential increase of school-age children attending public schools. Using the estimated build-out population projected, approximately 51 school-aged children would be generated from the Proposed Project. The introduction of new students would result in placing further demands upon school services. Although CUSD has been experiencing an increase in enrollment, the addition of 51 students to the district would represent a 2.3% increase in total enrollment and additional facilities would not be required. This impact is *less than significant*. No mitigation is necessary.

130-Unit Alternative

Similar to the Proposed Project, the 130-Unit Alternative could potentially increase student enrollments within the Carmel Unified School District. A conservative multiplying factor of 0.18 students per household was used to determine the potential increase of school-age children attending public schools. Using the multiplying factor of 0.18 students per household, the 130-Unit Alternative would generate approximately 23 school-aged children. The introduction of new students would result in placing less demand upon school services than the Proposed Project due to the decrease in residential units from 281 to 130. Therefore, although CUSD has been experiencing an increase in enrollment, the addition of 23 students to the district would represent a 1% increase in total enrollment and additional facilities would not be required. This impact would be *less than significant*. No further mitigation is necessary.

I. Recreational Demand

Impact PSU-10: Increased Use of Existing Neighborhood and Regional Parks (less than significant)

Proposed Project

The Proposed Project would result in an increase of approximately 849 residents in the Carmel Valley area. Monterey County Subdivision Ordinance (Section 19.12.010) requires standard for provision of regional parkland is 3 acres per 1,000 residents, or 0.003 acres per person. Monterey County has over 290,000 acres of land devoted to park and recreational facilities (Monterey County 2010). Based on the U.S. Census' 2010 Monterey County population estimate, the current ratio of parkland per resident is nearly 0.70 acres/person, which indicates that the County is not only meeting, but greatly exceeding its parkland standard. At buildout, the Proposed Project would increase demand for parkland by a total of 2.5 acres. Implementation of the Proposed Project would bring the ratio of parkland per resident to 0.698:1, which would result in a negligible impact on the existing demand on County and regional parks.

The increased population would also create a small increase in demand for active recreation facilities. Although, implementation of the Proposed Project would require the removal of one golf course, numerous other golfing facilities would still be available, including the east course of the Rancho Cañada Golf Club.

In accordance with County Subdivision Ordinances and the Quimby Act, the Proposed Project is required to provide 2.44 acres of park area. The Development Plan for the Project provides 2.50 acres of land for two neighborhood parks, 0.4 acres of open space, and 31 acres of habitat preserve land in the Rancho Cañada Village. Each park will provide passive recreational opportunities for residents and visitors to the Rancho Cañada Village. In addition, a network of paths and trails would be constructed into the natural habitat preserve, which would connect into the Carmel Valley Trail System's planned regional trail system. The project design is such that each resident of the development is within 5 minutes (0.25 mile) of a park or the habitat preserve area.

This parkland design feature, in conjunction with the ample County and regional parkland currently available to residents, is sufficient to offset increased demand associated with the Proposed Project. In fact, the Proposed Project would result in an increase of the ratio of parkland per resident with the creation of 39 acres of additional recreational area. Thus, the Proposed Project is not anticipated to create or accelerate substantial physical deterioration of existing facilities or create a demand for new facilities beyond that included in the project design. Impacts would be *less than significant*. No mitigation is required.

130-Unit Alternative

Similar to the Proposed Project, the 130-Unit Alternative would result in an increase of residents in the Carmel Valley area. However, the number of residential units would be reduced from 281 to 130; therefore, fewer residents would be added to the local population under the 130-Unit Alternative. The 130-Unit Alternative is proposing a similar amount of open space and recreation acreage with 39.4 acres for habitat conservation, 1.7 acres for neighborhood parkland, approximately 12.1 acres of common areas within the development area, and a trail network. The 130-Unit Alternative would result in a negligible impact on the existing demand on County and regional parks. Therefore, this impact is considered to be *less than significant*. No mitigation is required. Additionally, the 130-Unit

Alternative is not anticipated to create or accelerate substantial physical deterioration of existing facilities or create a demand for new facilities beyond that included in the project design. Impacts would be *less than significant*. No mitigation is required.

J. Open Space

Impact PSU-11: Quality and Quantity of Open Space Used for Recreation (less than significant)

Proposed Project

The Proposed Project would increase the current quantity of open space in the Carmel Valley area by dedicating 31.3 acres for habitat conservation, 2.50 acres for neighborhood parkland, and 0.47 acres of open space. The proposed trail network would accommodate increased recreational accessibility within or adjacent to open space areas as well as provide connections to a larger regional trail system. The Proposed Project includes resource management components that would preserve and enhance the quality of the land planned for open space. The maintenance and preservation of the proposed open space would also help to enhance and protect open space that exists adjacent to the project area, near the ecologically sensitive Carmel River. This action would offset the loss of golf course open space and thus the impact on the quantity and quality of open space would *be less than significant*. No mitigation is required.

130-Unit Alternative

The 130-Unit Alternative would increase the current quantity of open space in the Carmel Valley area by dedicating 39.4 acres for habitat conservation, 1.7 acres for neighborhood parkland, and approximately 12.1 acres of common areas within the development area. Similar to the Proposed Project, the 130-Unit Alternative proposes a trail network that would accommodate increased recreational accessibility within or adjacent to open space areas as well as provide connections to a larger regional trail system. However, the 130-Unit Alternative would develop more area of the golf course than the Proposed Project. Like the Proposed Project, the end result of the 130-Unit Alternative is that there will be only one golf course instead of two on the Rancho Cañada property. The proposed open space and park elements of the 130-Unit Alternative would offset the loss of golf course open space; and thus, the impact on the quantity and quality of open space would *be less than significant*. No mitigation is required.

K. Landfill Capacity

Impact PSU-12: Increased Demand for Solid Waste, Green Waste, and Recycling Disposal Needs (less than significant)

Proposed Project

The Proposed Project would increase the number of residents in the unincorporated Monterey County area. These residents would generate an increased demand for solid waste, green waste, and recycling disposal needs. Based on an average of waste generation rates provided by the California Department of Resources Recycling and Recovery (CalRecycle) (California Department of Resources Recycling and Recovery 2013), the new residential uses would generate approximately 992 tons of

solid waste per year[1]. Additionally, construction activities related to the Proposed Project would temporarily generate a substantial amount of solid waste.

MRWMD is currently disposing of approximately 823-tons of waste per day at the facility, which is below the maximum permitted disposal of 3,500-tons per day (Monterey Regional Waste Management District 2014). The use of green waste and recycling containers for residential and commercial collection has greatly contributed to reducing the total amount of waste disposed at the landfill. Solid waste generated by operation of the Proposed Project would represent less than 1% of the permitted capacity of the Monterey Peninsula Landfill. As such, the Monterey Peninsula Landfill would have sufficient capacity to serve the Proposed Project.

The Proposed Project would comply with the Chapter 10.41 Monterey County Code of Ordinances, which requires residences to separate recyclables from solid waste and store trash in approved containers for weekly removal.

Increased solid waste, green waste, and recycling needs resulting from the Proposed Project can be accommodated by the existing disposal services and facilities and, therefore, impacts would be *less than significant*. No mitigation is necessary.

130-Unit Alternative

Similar to the Proposed Project, the 130-Unit Alternative would increase the number of residents in the unincorporated Monterey County area. These residents would generate an increased demand for solid waste, green waste, and recycling disposal needs. However, the 130-Unit Alternative would reduce the number of residential units from 281 to 130.

The 130-Unit Alternative would comply with the Chapter 10.41 Monterey County Code of Ordinances, which requires residences to separate recyclables from solid waste and store trash in approved containers for weekly removal.

Increased solid waste, green waste, and recycling needs resulting from the 130-Unit Alternative can be accommodated by the existing disposal services and facilities and, therefore, impacts would be *less than significant*. No mitigation is necessary.

[1] Disposal Rate: 6.4 pounds/person/day.