Chapter 5
Alternatives

According to Section 15126.6 of the CEQA Guidelines, an EIR shall describe and evaluate a reasonable range of alternatives to the proposed project that would feasibly attain most of the project's basic objectives, but that would avoid or substantially lessen identified significant environmental impacts of the project. CEQA does not require that an EIR present the alternatives analysis in the same level of detail as the assessment of the proposed project, and does not require that every conceivable alternative to a project be considered. Rather, an EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision making.

To develop a reasonable range of alternatives to the project, the County considered the following:

- Project Objectives.
- Significant Impacts of the Proposed Project.
- Alternatives Suggested during the Scoping Process.

Through this process, the County identified 17 alternatives for consideration. Of these, 11 were dismissed from further consideration because they did not meet project objectives or were not feasible, and 6 were identified as project alternatives to be evaluated.

This chapter includes a description of how the project alternatives were developed, evaluation of the 6 alternatives in comparison to the Proposed Project (also called Project), and identification of the environmentally superior alternative.

Development of Alternatives

Project Objectives

As described in Chapter 2, *Project Description*, the project objectives of the applicant PBC are to:

1. Provide affordable housing in close proximity to PBC facilities and other Del Monte Forest employment areas.
2. Provide affordable housing in close proximity to public schools and residential services.
3. Provide affordable housing in an area currently zoned for and adjacent to existing residential development.
4. Provide affordable housing in an area for which PBC holds entitlement to water service by California American Water Company, as a result of construction of the Carmel Area Wastewater district-Pebble Beach Community Services District Wastewater Reclamation Project.
5. Provide affordable housing that is owned and operated by PBC.

With respect to objective #5, PBC intends to own, operate, and lease 24 townhouse apartments in compliance with all County requirements. PBC also intends to offer these 24 rental units on a preferential basis to PBC employees who meet the county's income qualification requirements. In

the event of employment separation, PBC's lease will require that the rental unit be vacated within a reasonable period of time not to exceed ninety (90) days in order that the unit may again be offered on a preferential basis to existing PBC employees meeting the county's qualification requirements. If no qualified PBC employees are interested in leasing an available unit, then PBC intends to offer the unit on a preferential basis to employees of other entities operating within the Del Monte Forest, such as the Pebble Beach Community Services District and Stevenson School, subject to the same requirement of continued employment by such entity. If no qualified employees of PBC or other Del Monte Forest entities are interested in leasing an available unit, then PBC intends to offer the unit to other qualified employees working on the Monterey Peninsula.

These objectives were considered during the formulation of potential alternatives for consideration in this Draft EIR.

Significant Impacts of the Proposed Project

The State CEQA Guidelines Section 15126.6 (f) states that "alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project."

As described in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*, and as summarized in **Table ES-1** in the Executive Summary, there could be significant impacts (before mitigation) for the following resource topics: Aesthetics; Biological Resources; Climate Change; Geology, Seismicity and Soils; Noise; Transportation; and Water Supply and Demand. Therefore, the description of significant Project impacts below focuses on these resource topics. All Project impacts could be reduced to a less than significant level with mitigation, except water supply and traffic impacts which are significant and unavoidable with mitigation.

The following resource topics would not generate alternatives because potential Project impacts would be less than significant without mitigation: Air Quality; Cultural Resources; Hydrology and Water Quality; Land Use and Recreation; and Public Services and Utilities.

Aesthetics

The Project would change the visual character of the project site and introduce light and glare. The impacts would be less than significant with implementation of the mitigation measures described in Section 3.1, *Aesthetics*.

Biological Resources

The Project would result in the loss of and disturbance to environmentally sensitive habitat and trees (e.g., Monterey pine forest). The Project also could result in the loss of special-status wildlife and their habitat (e.g., California red-legged frog and other species) and degradation of waters (e.g., drainage to Sawmill Gulch). Additionally, the Project would contribute to cumulative impacts to these resources. The impacts would be less than significant with the Applicant-proposed preservation and implementation of the mitigation measures described in Section 3.3, *Biological Resources*. In addition, the dedication of the Old Capitol site would provide additional benefit to the preservation of biological resources, but is required by the prior buildout project condition of approval, not as mitigation for the inclusionary housing project.

Climate Change

The Project would generate greenhouse gas (GHG) emissions during construction and operation, which would contribute to cumulative GHG impacts. The impacts would be less than significant with implementation of the mitigation measures described in Section 3.4, *Climate Change*.

Geology, Seismicity, and Soils

Project construction (e.g., excavation for utilities installation in areas of shallow groundwater and weak soils) could result in seepage and exacerbate soil instability. The impact would be less than significant with implementation of the mitigation measures described in Section 3.6, *Geology, Seismicity, and Soils*.

Land Use and Recreation

The Project would increase recreational demand and use, which could result in and contribute to cumulative recreational impacts on biological resources. The impacts would be less than significant with implementation of the biological mitigation measures described in Section *3.3*. *Biological Resources*.

Noise and Vibration

Project construction would generate noise and ground-borne vibration during construction that could exceed exposure thresholds. Noise impacts overall would be less than significant with implementation of the mitigation measures described in Section 3.3, *Noise and Vibration*.

Transportation and Circulation

The Project would result in construction-related traffic that could disrupt traffic flow on area roadways. Once constructed, the Project would increase pedestrian circulation and roadway hazards, and would add vehicular traffic to specific far intersections and highway segments that would worsen existing unacceptable levels of service and for which the project impact and cumulative impact has been identified as significant and unavoidable. Therefore, although the Project would contribute relatively smaller number of new trips to the impacted locations, it would be a significant and unavoidable impact. Implementation of mitigation measures described in Section 3.11, *Transportation and Circulation*, would reduce identified significant impacts, but impacts related to certain roadways would remain significant and unavoidable even after mitigation.

Water Supply and Demand

As described in Section 3.12, *Water Supply and Demand*, the Project's water demand would represent an increase in water use compared to existing conditions. Although the new water demand would be within the applicant's current water entitlement and the project could be legally supplied with water by Cal-Am, regional water supplies are uncertain. Cumulative water demand on the Monterey Peninsula exceeds Cal-Am's current legal water supply requiring new regional water supplies to be developed. Thus, servicing the project could intensify regional water shortages until a regional water supply project is built. With regard to water infrastructure capacity, local water infrastructure is adequate to serve the project. However, developing regional water supply infrastructure and operations could have secondary environmental impacts that could be significant. Finally, if the State Water Board delays enforcement to cease withdrawals from the Carmel River (scheduled to begin in 2017), then the Project and other entitlements could increase withdrawals

from the Carmel River, which would have significant unavoidable impacts on biological resources associated with the Carmel River compared to conditions without the project. Therefore, this impact is considered significant and unavoidable. However, it should be noted that the Applicant has previously financed the Recycled Water Project, which has resulted in substantially lower Carmel River aquifer withdrawals than would have happened without the Recycled Water Project.

Alternatives Suggested during the Scoping Process

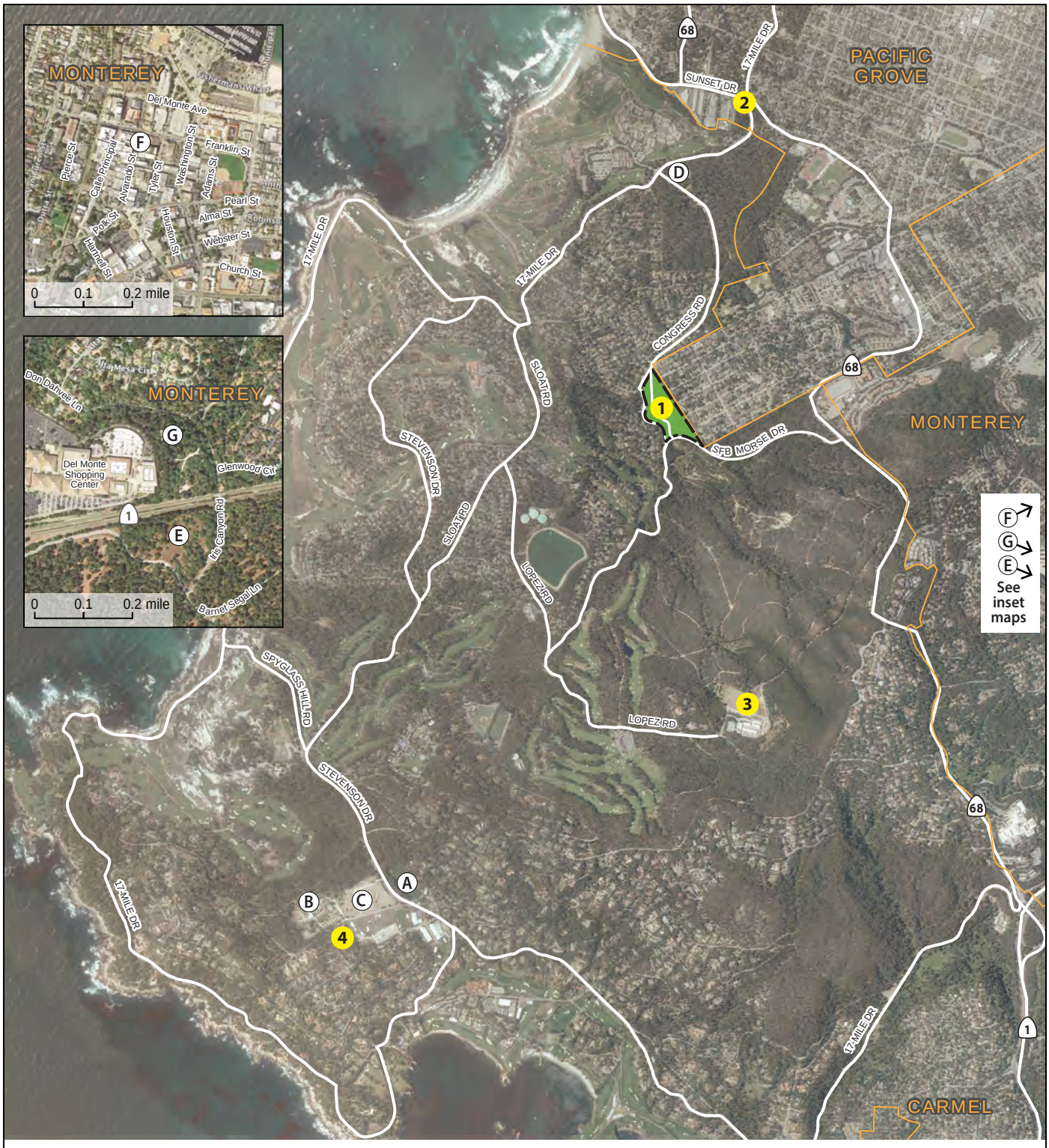
The NOP for the Proposed Project was issued on August 15, 2014 (**Appendix A**), and a public scoping meeting was held on August 28, 2014. Verbal and written comments were received in response to the NOP and at the scoping meeting. The scoping comments included the following suggested alternatives.

- Alternative locations that reduce impacts to biological resources and provide access to infrastructure/services.
- Offsite locations suggested:
  - Sunset Drive/17-Mile Drive, City of Pacific Grove
  - Parking Lot on Spanish Bay Drive/17-Mile Drive, Pebble Beach
  - Corporation Yard, Pebble Beach
  - Old driving range (Area V), Pebble Beach
  - Old Capitol Site, City of Monterey
  - 410 Alvarado Street, City of Monterey
  - Site between Del Monte Shopping Center and Highway 1, City of Monterey
  - Area around equestrian center and Stevenson Drive, Portola Road, Alva Lane, and Forest Lake Drive (Area U, Special Events Staging Area), Pebble Beach
  - Areas in Marina near Fort Ord
- Alternative configurations on site so rental units are in structures that are sized and styled more like houses in the surrounding neighborhood (i.e., duplex or triplex units).
- Rental units dispersed in multiple areas throughout Pebble Beach.
- In-lieu fee only with no new rental units.

Alternatives Considered

The alternatives considered for evaluation in the Draft EIR are identified in **Table 5-1**, and the locations are shown in **Figure 5-1**. They include alternatives that were suggested during public scoping and that reduce significant impacts, as well as the No Project alternative as required by CEQA.

As stated above, alternatives that do not avoid or substantially lessen significant impacts of the Project do not need to be analyzed in an EIR. The only significant and unavoidable impacts are the minor contribution the Project would make to existing and cumulative traffic and water supply impacts.



Alternatives Evaluated in the EIR

- 1 Project Site (1 No Project, 5 Reduced Density, 6 Reduced Units)
- 2 Sunset Drive/17-Mile Drive
- 3 Corporation Yard
- 4 Collins Residential Area

Alternatives Dismissed from Further Consideration

- A Area V
- B Area U
- C Special Events Staging Area
- D Parking Lot at Spanish Bay Drive/17-Mile Drive
- E Old Capitol Site
- F 410 Alvarado Street
- G Site between Del Monte Shopping Center and Highway 1

Note: Offsite Alternatives H, I and J are not shown because no specific locations were suggested.

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Figure 5-1
Alternatives Considered

Table 5-1. Alternatives Considered

Alternative	Description[1]	Feasible?	Project Objectives: Provide affordable housing in close proximity to PBC facilities and other DMF employment areas.	Provide affordable housing in close proximity to public schools and residential services.	Provide affordable housing in area currently zoned for and adjacent to existing residential development.	Provide affordable housing in area for which PBC holds entitlement to water service.[2]	Provide affordable housing that is owned and operated by PBC.	Reduce Significant Impacts?
Alternatives to be Evaluated in EIR								
1. No Project	No inclusionary units on Project site, but potential for future Area D development consistent with current zoning. In-lieu fee for 24 units.	Yes						Possibly. Some may perceive single-family market-rate residential development on Area D to be more consistent with adjacent land use.
2. Sunset Drive/ 17-Mile Drive	24 inclusionary units. Includes Area D buildout potential.	Yes Site owned by PBC	X	X		X	X	Possibly. Some may perceive single-family market-rate residential development on Area D to be more consistent with adjacent land use.
3. Corporation Yard	18 inclusionary units, plus 10 market rate units already approved for the site (reconfigure 6.6 acre development footprint). Includes in-lieu fee for 7 units and Area D buildout potential.	Yes Site owned by PBC. Although not consistent with prior decision, it doesn't displace prior decision and does not push development into HHNA.	X			X	X	Possibly. Some may perceive single-family market-rate residential development on Area D to be more consistent with adjacent land use.

Alternative	Description[1]	Feasible?	Project Objectives: Provide affordable housing in close proximity to PBC facilities and other DMF employment areas.	Provide affordable housing in close proximity to public schools and residential services.	Provide affordable housing in area currently zoned for and adjacent to existing residential development.	Provide affordable housing in area for which PBC holds entitlement to water service.[2]	Provide affordable housing that is owned and operated by PBC.	Reduce Significant Impacts?
4. Collins Residential Area[3]	24 inclusionary units, plus 4 market rate units already approved for the site (reconfigure 3.8 development footprint). Includes Area D buildout potential.	Yes Site owned by PBC. Although not consistent with prior buildout project approval, it doesn't displace prior decision, but would require LUP amendment from California Coastal Commission.	X		X	X	X	Possibly. Some may perceive single-family market-rate residential development on Area D to be more consistent with adjacent land use.
5. Reduced Density On-Site	24 inclusionary units, at single family density on larger footprint.	Yes	X	X	X	X	X	Possibly. Some may perceive single-family residential development on Area D to be more consistent with adjacent land use.
6. Reduced Units On-Site	18 inclusionary units, at similar density on smaller footprint. Includes in-lieu fee for 7 units.	Yes	X	X	X	X	X	Yes. Would slightly reduce on-site impacts. Off-site impacts unknown.
Alternatives Dismissed								
Area V	24 inclusionary units, plus 14 market rate units already approved for the site (reconfigure 5.89 acre development footprint).	Dismissed because evaluating the nearby Collins Residential Area[3]						
Area U	24 inclusionary units, plus 7 market rate units already approved for the site (reconfigure 5.48 acre development footprint).	Dismissed because evaluating the nearby Collins Residential Area[3]						

Alternative	Description[1]	Feasible?	Project Objectives: Provide affordable housing in close proximity to PBC facilities and other DMF employment areas.	Provide affordable housing in close proximity to public schools and residential services.	Provide affordable housing in area currently zoned for and adjacent to existing residential development.	Provide affordable housing in area for which PBC holds entitlement to water service.[2]	Provide affordable housing that is owned and operated by PBC.	Reduce Significant Impacts?
Special Events Staging Area	24 inclusionary units and relocating staging area.	Dismissed because evaluating nearby Collins Residential Area[3] and because relocating the special events staging area is not feasible because no other area in the forest is large enough for PBC to use that is in close proximity to major special events.						
Parking Lot at Spanish Bay Drive/ 17-Mile Drive	24 inclusionary units on parking lot, and existing 285-space surface parking relocated to new 285-space underground parking at The Inn at Spanish Bay.	Not financially feasible and dismissed because constructing a new underground structure would cost substantially more than paying the in-lieu fee. This alternative was analyzed as Alternative 4 in the Pebble Beach Company Project DEIR (Monterey County 2011).						
Old Capitol Site	24 inclusionary units.	Not feasible and dismissed because 1) no water entitlement and 2) per Condition No. 143 in the approval of the Pebble Beach Company Project (buildout project), if the inclusionary housing is built, then PBC would dedicate the 135-acre Old Capitol Site, which has 75 acres of Monterey pine forest, to County.						
410 Alvarado Street	24 inclusionary units.	Not feasible and dismissed because site not owned by PBC[4] and is deed restricted. There is an active building permit, and project is partially built.						
Site between Del Monte Shopping Center and Highway 1	24 inclusionary units.	Not feasible and dismissed because the site (APN 001-761-037-000) is not owned by PBC[4] and does not have water entitlement.						
Areas in Marina near Ft Ord	24 inclusionary units dispersed on properties in Marina.	Not feasible and dismissed because no specific sites were suggested, and potential sites not owned by PBC[4] and may not have water entitlement.						
Housing Dispersed in Multiple Areas	24 inclusionary units dispersed on other properties in unidentified areas.	Not financially feasible and dismissed because no specific sites were suggested, specific locations would need to be identified and would need to be in the Del Monte Forest to qualify for PBC water, and land acquisition costs[4] and constructions costs would be substantially higher than building 24 units on a single site and or paying the in-lieu fee.						
Use Existing Housing as Rental Housing	Secure 15-year leases for rental housing from existing housing stock in forest.	Not financially feasible and dismissed because 18-25 existing housing units would need to be purchased in the Del Monte Forest to qualify for PBC water and would cost substantially more than building 24 units on a single site or paying the in-lieu fee. Additionally, County regulations require affordable housing units to be newly constructed and prohibit conversion of existing housing stock to affordable housing.[4]						

			Project Objectives					
Alternative	Description[1]	Feasible?	Provide affordable housing in close proximity to PBC facilities and other DMF employment areas.	Provide affordable housing in close proximity to public schools and residential services.	Provide affordable housing in area currently zoned for and adjacent to existing residential development.	Provide affordable housing in area for which PBC holds entitlement to water service.[2]	Provide affordable housing that is owned and operated by PBC.	Reduce Significant Impacts?
In-lieu fee only with no new rental units	No inclusionary housing units.	Dismissed because the County's ultimate goals and requirements are to construct inclusionary housing.						

[1] Refer to **Figure 5-1** for the alternative location. As described in Chapter 1, *Introduction*, under Background, Condition No. 18 of the Pebble Beach Company Project (buildout project) requires construction of at least 18 inclusionary housing units and payment of in-lieu fees for any remainder for the approved 90-100 residential lots. Because the proposed project being evaluated in this EIR includes 24 inclusionary units, PBC would pay the County an inclusionary fee for one unit if and when it builds out all 100 lots; and this same assumption applies to Project alternatives with 24 inclusionary units. The Project alternatives with 18 inclusionary units include an in-lieu fee for 7 additional units.

[2] Provide affordable housing in area for which PBC holds entitlement to water service by California American Water company as a result of construction of the Carmel Area Wastewater District-Pebble Beach Community Services District Wastewater Reclamation Project.

[3] Comments on the NOP suggested consideration of several sites in the same general area, including Area V (currently approved for 14 market rate units on 5.89 acres), Area U (currently approved for 7 market-rate units on 5.48 acres), Special events staging area (located adjacent to equestrian center). The Collins Residential Area (currently approved for 4 market rate units on 3.84 acres) is in the same general area. Advantages of developing the Collins Residential Area include: 1) Requires least amount of relocation of approved uses. The site could be developed with 24 inclusionary units within 2.6 acres out of the 3.84-acre area, and the 4 market rate units on the remainder 1.24 acres (avg. lot = 0.31 acre each). Or, the 4 market rate lots could be added to Area U, V, or Corp Yard residential areas by downsizing lot sizes without expanding into ESHA. 2) The site is surrounded by commercial/visitor-serving uses on two sides (Collins field driving range and equestrian center) and single family residential development on the other side. 3) No further tree removal or additional impact to ESHA required. 4) Incorporating inclusionary units with the approved market rate units in Area U and Area V would NOT require encroachment into surrounding preservation areas (ESHA); but it would increase the number of people near ESHA areas and would increase the direct loss of Monterey Pine Forest at Area U and V within the previously approved development areas.

[4] Section 18.40.080 of the Inclusionary Housing Ordinance states that off-site units must be newly constructed (A) and the property owned or controlled by the applicant at the time of first approval (C).

X = Meets project objective

The alternatives considered were evaluated for their feasibility, ability to achieve most of the project objectives, and ability to reduce project impacts. This evaluation is shown in **Table 5-1**. In the table, the alternatives considered are separated into those that are evaluated in the Draft EIR (Alternatives 1-6), and those that were considered but dismissed from further analysis.

Although off-site alternatives would result in building inclusionary housing elsewhere, the off-site alternatives would not eliminate the ability to develop the residentially designated area at Area D since Area D contains residentially-designated property that is physically feasible to develop for market-rate housing that could utilize the Applicant's water entitlement. As a result, none of the off-site alternatives would entirely eliminate the associated aesthetic, biological resource, and other impacts associated with residential development at Area D but would change the character of those impacts. Furthermore, the off-site alternatives would result in a higher regional level of development because they would result in construction of 24 units of inclusionary housing in addition to future Area D market-rate housing units, resulting in higher regional traffic and water supply impacts. Only on-site alternatives would extinguish the ability to build market-rate units at Area D. While some may desire that an off-site alternative include permanent preservation of all of Area D as open space forest, there are constitutional limits to the requirements that local, state, and federal governments can place on private development. Those limits were established in the U.S. Supreme Court rulings in the *Nollan vs. California Coastal Commission* and *Dolan vs. City of Tigard* cases which established that government impositions on private property must have a nexus and proportionality to the impacts caused by development on private property. As discussed, off-site alternatives would not have sufficient impacts on the Monterey pine forest to mandate full preservation of Area D to exclude the potential for future market-rate residential development on the site.

As noted in **Table 5-1** (footnotes), comments on the NOP suggested consideration of several sites in a general area of Pebble Beach containing Area V (currently approved for 14 market rate units on 5.89 acres), Area U (currently approved for 7 market-rate units on 5.48 acres), and the Special Events Staging Area (located adjacent to equestrian center). The Collins Residential Area (currently approved for 4 market rate units on 3.84 acres) is in the same general area. An alternative focused on the Collins Residential Area, instead of the other sites in this area, was selected for consideration (instead of the other nearby areas) for the following reasons:

- It would require the least amount of relocation of approved uses because the site could be developed with 24 inclusionary units within 2.6 acres of the 3.8-acre area, and the 4 market rate units on the remainder 1.2 acres.
- The site is surrounded by recreation and visitor-serving uses on two sides (Collins field driving range and equestrian center) and single family residential development on the other two sides.
- No further tree removal or additional impact to ESHA[1] would be required.
- Incorporating inclusionary units with the approved market rate units in Area U and Area V would not require encroachment into surrounding preservation areas (ESHA) but would increase the number of people near ESHA areas and would increase the direct loss of Monterey Pine Forest at Area U and V within the previously approved development areas.

[1] Designated Environmentally Sensitive Habitat Area (ESHA) by the California Coastal Commission.

Therefore, the Collins Residential Area is evaluated as Alternative 4, and the other sites in this particular area have been dismissed from further consideration.

Alternatives Evaluated in Draft EIR

The alternatives analyzed in the Draft EIR include the No Project Alternative (Alternative 1), as required by CEQA, three offsite alternatives (Alternatives 2, 3, 4), and two onsite alternatives (Alternatives 5, 6). The characteristics of the Alternatives are described in this section and summarized in **Table 5-1**.

All subject areas are analyzed for each alternative, though at a more general level than the analysis in Chapter 3, to compare the merits of the alternatives to the Project, as allowed by CEQA (Guidelines 15126.6(d)).

Alternative 1 – No Project

CEQA requires analysis of a No Project alternative to allow decision makers to compare the impacts of approving a project with the impacts of not approving a project (Guidelines 15126.6(e)). The no-project analysis must discuss the existing conditions at the time the NOP is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure. If future uses of the land are predictable, such uses should be discussed as possible no-project conditions.

As such, under the No Project alternative, the inclusionary housing project would not be constructed at the Project site, and the applicant would pay the County-required in-lieu fee. As a consequence of paying the in-lieu fee, 24 inclusionary housing units may be constructed elsewhere at an unknown time.

Additionally, as a consequence of not constructing the proposed inclusionary housing units on the Project site, this portion of Area D could be developed in accordance with current land use plans and zoning. Area D, which is identified as such in the County's Del Monte Forest Land Use Plan, is comprised of Parcels F, G and H (portion of) in accordance with the PBC Tentative Map HH-2. Parcels F and G comprise the 13.2-acre Project site, and Parcel H is part of the Huckleberry Hill Natural Habitat Area south of SFB Morse Drive. For purposes of this analysis, "Area D buildout" is referencing development of Parcels F and G in accordance with current zoning.

Another consequence of the Pebble Beach Company paying an in-lieu fee instead of constructing inclusionary housing units, the Company would not dedicate the 135-acre Old Capitol Site to the County[2].

[2] Per Condition No. 143 in the approval of the Pebble Beach Company Project, if the inclusionary housing is built, then the Pebble Beach Company would dedicate their 135-acre Old Capitol Site, which contains 75 acres of Monterey pine forest habitat including habitat for Yadon's piperia and other sensitive biological resources, to the County or entity approved by the County for parkland purposes. If the inclusionary housing is not built by the Pebble Beach Company, then they would not dedicate the site.

Alternative Characteristics

In-Lieu Fee

Under the No Project alternative, the 24 units of inclusionary housing would not be constructed at the Project site. Instead, the Applicant would pay an in-lieu fee to the County. Payment of an in-lieu fee may result directly or indirectly in construction of inclusionary housing at a location elsewhere outside of Pebble Beach. Given the multiplicity of uses to which in-lieu fees are used by the County to support inclusionary housing, it is speculative to conclude precisely when and where such units might be built, how many might be built, or what the site plan would be. Once such a project is defined and actually proposed, the County will ensure CEQA compliance and identification of project impacts and required mitigation. For the purposes of this analysis, it is assumed that the location would be outside Pebble Beach, but within the Greater Monterey Peninsula Area Plan area (GMPAP) in an incorporated or unincorporated area.

Area D Buildout

Without the development of inclusionary housing on 2.7 acres and the preservation of 10.5 acres as proposed, Area D could be built out (developed) in accordance with the current land use plans and zoning designations. As described in Section 3.8, *Land Use and Recreation*, the County's land use designation is a combination of Medium Density Residential (MDR) and Open Space Forest (OF), and the zoning is currently split-zoned, as shown in **Figure 3.8-2**. Of the total 13.2 acres, 7.7 acres are zoned MDR/4-D, which allows residential development of up to 4 units per acre subject to design review; and 5.5 acres are zoned RC/10, which preserves land as open space but would allow 1 residential unit. Therefore, based on current zoning, up to 31 market rate units could be constructed in Area D (Sidor pers. comm.).

Impact Analysis

The No Project alternative would not necessarily reduce significant project impacts because paying an in-lieu fee, instead of implementing the Project, could result in the construction of 24 inclusionary housing units and the associated impacts occurring elsewhere in the GMPAP as well as buildout of Area D for market-rate housing.

Overall, impacts of the No Project alternative could be similar to or greater than those identified for the Project because there could be direct impacts for all resource topics from the possible construction of 24 inclusionary housing units elsewhere in the GMPAP, as well as from the possible construction of up to 31 market-rate residential units in Area D.

Impacts of Payment of In-lieu fee

The specific impacts of inclusionary housing development elsewhere cannot be identified because the specific location is not known. However, it is reasonable to assume that the impacts would be similar to those of the Project for many resource topics, such as air quality, climate change, public services/utilities, traffic, and water supply. Other impacts would be site-specific, such as aesthetics, biological resources, cultural resources, geology/soils, hydrology/water quality, land use and recreation, and noise. Although the noise and traffic generated would be similar, the impact on surrounding land uses could vary depending on the site. A general discussion of the types of impacts that could occur is discussed below.

Aesthetics

The aesthetic impacts of payment of an in-lieu fee cannot be identified because a specific location is not known. Similar to the Project, impacts could include degradation of the visual character and quality of the site depending on the characteristics of the site, and introduction of light and glare at the site and in the project area depending on nearby uses. Unlike the Project, impacts could include adverse visual effects on public viewing in or near visually prominent areas identified in the GMPAP or within scenic route corridors.

Air Quality

The air quality impacts of construction 24 inclusionary housing units elsewhere would likely be similar to the Project. There would be construction-related emissions, such as short-term increase in PM10 emissions due to grading and construction and toxic air contaminant (TAC) emissions from diesel truck and equipment use. There would be long-term ROG, NOx, CO and PM10 emissions from vehicular traffic associated with the new residences. If there are nearby sensitive receptors, they could be exposed to TACs from construction.

Biological Resources

The biological resource impacts of building inclusionary housing units using the in-lieu fee cannot be identified because a specific location is not known. An undeveloped site like the Project would likely have greater impacts than redeveloping a previously disturbed site. Like the Project, impacts could include removal and indirect impacts to trees and Monterey pine forest, wildlife breeding and nesting, potential degradation of waters/wetlands, and adverse effects on special-status plant and wildlife species and their habitat, as well as common wildlife species and plant communities.

Additionally, if the Pebble Beach Company pays an in-lieu fee instead of constructing inclusionary housing, the Old Capitol Site with 75 acres of Monterey pine forest would not be preserved. Per Condition No. 143 in the approval of the Pebble Beach Company Project, if the inclusionary housing is built, then PBC would dedicate the 135-acre Old Capitol Site, which contains 75 acres of Monterey pine forest habitat including habitat for Yadon's piperia and other sensitive biological resources. While construction off-site would be required to mitigate its own biological resources, the dedication of the Old Capitol Site is far in excess of what would likely be required as mitigation for construction of 24 inclusionary housing units elsewhere, even if located in an area with Monterey pine forest.

Climate Change

The climate change impacts of payment of an in-lieu fee would likely be similar to the Project. There would be project-related greenhouse gas emissions during construction and from operation that would contribute to climate change impacts (including any tree removal necessary for construction). If the development site is at a site near the coast, it is possible persons or property could be exposed to reasonable foreseeable impacts of climate change, such as sea level rise; although given the real estate costs of land near the coast, it is unlikely that an inclusionary housing project would be proposed near the coast.

Cultural Resources

The cultural resources impacts of payment of an in-lieu fee would likely be similar to the Project. Grading and excavation could disturb and destroy previously undiscovered archaeological resources, paleontological resources, or human remains. Unlike the Project if there are structures on or adjacent to the site, residential development could cause substantial adverse change in the significance of a historical resource.

Geology, Seismicity, and Soils

The geology, seismicity and soils impacts of payment of an in-lieu fee cannot be identified because a specific location is not known. Like the project, there would be potential impacts associated with placing structures in a region that could experience groundshaking from earthquakes and soil erosion and loss of soil from grading and excavation activities but standard conditions and the California Building Code requirements can likely address any such issues. Similarly, potential impacts associated with landslides and slope stability, soils constraints (e.g., shallow groundwater, weak soils, expansive soils, unconsolidated fill), and subsurface hazardous materials could also be addressed by standard conditions of approval, California Building Code requirements and project-specific mitigation.

Hydrology and Water Quality

The hydrology and water quality impacts of payment of an in-lieu fee cannot be identified because a specific location is not known. Potential impacts might include depletion of groundwater supplies or interference with groundwater recharge if the site is located within a groundwater basin, or flooding if the site is within a 100-year flood zone. Like the Project, residential development at an unknown site could alter surface drainage patterns, or result in increased impervious surface which could degrade surface water quality.

Land Use and Recreation

The land use and recreation impacts of payment of an in-lieu fee cannot be identified because a specific location is not known. Potential impacts include introducing a new land use that could be incompatible with surrounding land uses or general character of the area, and inconsistency with the 2010 Monterey County General Plan and the Greater Monterey Peninsula Area Plan. Adding approximately 78 new residents to an area would likely increase the use of existing parks and recreation facilities in the vicinity, but these impacts are all likely mitigable.

Noise and Vibration

The noise and vibration impacts of payment of an in-lieu fee cannot be identified because a specific location is not known. If the site is near residences or other sensitive receptors like the Project site, then the impacts would be similar to the Project. These impacts could include exposure to construction-related noise and ground-borne vibration/noise that exceeds County standards but these impacts are mitigable. Residential use is not likely to result in long-term noise increases in excess of County standards regardless of location.

Public Services and Utilities

The public services and utilities impacts of payment of an in-lieu fee would be similar to the Project, but could affect different service providers. A residential project with 24 inclusionary housing units is estimated to generate up to 78 residents requiring services. Additionally, if the site is near open space areas like the Project site, there could be risk of wildland fires.

Transportation and Circulation

The transportation and circulation impacts of payment of an in-lieu fee cannot be identified because a specific location is not known. If it is in the same area of the county as the Project, then the impacts would be significant and unavoidable, like the Project, because the level of service at certain roadways, intersections and highways segments are already exceeding established standards. Construction and operation would result in short term and long term, respectively, increases in traffic volumes that could affect level of service and intersection operations in the project vicinity.

Water Supply and Demand

Given current limits on water supply, it is speculative whether or not there would be available water for an inclusionary project in the GMPAP in the near-term in absence of a water entitlement like the Applicant's water entitlement proposed for use for the Project. The Applicant's water entitlement is tied to specific areas and cannot be used anywhere. Furthermore, the prior buildout project approval condition requiring payment of an in-lieu fee if inclusionary housing units are not constructed by the Applicant does not specify dedication of a portion of the water entitlement.

Impacts of Area D Buildout

As noted above, under No Project conditions, Area D could be developed with up to 31 market rate housing units on 13.2 acres. Although it is reasonable to assume that most development would occur on the 9.2 acres east side of SFB Morse Drive, because of the existing drainage and steeper slopes on the 4.0 acres west of SFB Morse Drive, it is possible some development could occur on the west side (Sidor pers. comm.).

It is likely that individual market rate units would be larger and thus have a larger development footprint (>2,000 sf each, compared to the Project's individual inclusionary units (1,078-1,343 sf each). With up to 31 market rate housing units allowed on 7.7 acres (compared to the Project's 24 inclusionary units on 2.7 acres), buildout of Area D would likely result in a larger disturbance area. With 31 units on 7.7 acres, the average lot size is 0.25 acre. Based on an average lot disturbance area of 44%[3], buildout of Area D would disturb 3.4 acres.

[3] This assumption is based on that used in the Pebble Beach Company Project EIR (Monterey County 2011/2012) for the no project alternative. The assumptions used for potential buildout of the 90 lot residential lots, under the no project scenario, was 15,000 sf or 0.34 acre disturbance area per lot. The size of the 90 lots ranged from 0.38 acre to 1.49 acres, with an average lot size of 0.76 acre. Therefore, based on an average lot size of 0.76 acre and an assumed disturbance area of 0.34 acre per lot, the average lot disturbance is roughly 44% of the lot. Therefore, 44% is used to estimate the potential disturbance area per lot for buildout of Area D. For Area D, with 31 market rate units on 7.7 acres, 44% of 7.7 acres is 3.4 acres. Or, 44% of the average lot size (0.25 acre) is 0.11 acre, which multiplied by 31 lots is 3.4 acres.

The market rate units could add up to approximately 92 new residents, compared to the Project's approximately 78 new residents[4]. Overall, most impacts would be similar to developing 24 inclusionary housing units. Some impacts could be less, such as construction-related impacts as the development could likely be spread out over time if units are constructed individually. However, many impacts could be more because there could be more units over a larger footprint and more new residents. A general discussion describing how the impacts could differ compared to the Project is discussed below.

Aesthetics

Similar to the Project, residential development in Area D could degrade the visual character and introduce new light and glare.

Up to 31 new market rate housing units could be dispersed throughout the MDR/4 area, with 1 unit in the RC/10 area (refer to **Figure 3.8-1** in Section 3.8). This could place housing closer to Pebble Beach residents along Congress Road and closer to Pacific Grove residents to the east, because portions of the area zoned MDR are closer to nearby residences than the Project footprint (see **Figure 5-5** under the Alternative 5 discussion for an illustration).

The individual market rate could include moderate size single-story structures or large two-story structures, similar to other market rate housing in Pebble Beach. Because units could be developed along SFB Morse Drive and closer to existing residents to the east and west of Area D, the market rate housing could be more visible from roadways and adjacent residences, compared to the Project, particularly since the forested open space buffer would not be preserved as proposed. With the Project, 10.5 acres would be preserved; and under current zoning, only 5.5 acres is zoned R/C. This could be perceived by some viewers as a greater degradation of existing visual character than the clustered inclusionary housing. However, the density of market-rate housing would be lower, providing an opportunity for more trees in between; and instead of a new single roadway with parking spaces, there would be individual driveways possibly with small ancillary structures (e.g., garage, shed). This could be perceived by some viewers as lesser degradation of visual character than the 24 units of inclusionary housing.

Similarly, the introduction of light and glare could affect some adjacent residents more than the Project if the units are situated closer to the residents and the houses have a lot of exterior lighting. However, with the Project, the new light and glare would be clustered together which could be more noticeable to some viewers. Surrounding forested open space and County requirements for down-lit exterior fixtures would reduce impacts under either scenario.

Air Quality

Similar to the Project, residential development in Area D could result in short-term emissions during construction and long-term emissions from new vehicular traffic.

[4] As discussed in Section 3.10, *Public Services and Utilities*, the average household size in unincorporated Monterey County is 2.96 persons (California Department of Finance 2014). Because the average household size for a mixture of two- and three-bedroom multi-family inclusionary housing units may be slightly larger, total anticipated residents per household for the Project was calculated using the 2014 countywide (incorporated cities plus unincorporated area) DOF estimate of average household size, 3.23 persons (California Department of Finance 2014). Based on the 3.23 average, the Project's 24 units would add up to approximately 78 new residents.

The short-term PM10 daily emissions due to grading and construction could be less than the Project, which were determined less than significant, because the 31 units could be constructed individually over a longer time period. The long-term increase in ROG, NOx, CO, and PM10 emissions from vehicular traffic associated with the new residents could be higher than the Project if all 31 units are built and occupied with up 91 residents. However, because the Project with 24 units would be have emissions well below MBUAPCD thresholds (refer to **Table 3.2-5** in Section 3.2), it is likely buildout with 31 units would be below as well.

Biological Resources

Buildout of Area D for market-rate units would likely have a greater impact on biological resources than the Project.

As described above, up to 31 market rate housing units on 7.7 acres could result in a larger disturbance area, an estimated 3.4 acres compared to the Project's 2.7 acres. Therefore, there could be more impacts to tree removal, Monterey pine forest, special-status plant and wildlife species, and common species.

Buildout of Area D could also result in greater impacts to waters because the zoning allows development closer to the existing Sawmill Gulch drainage extending through the site, especially on the west side of SFB Morse Drive (refer to **Figure 3.8-2** for the MDR area and **Figure 3.7-1** for the drainage location).

Additionally, with the potential to introduce 92 new residents to the area (compared to the Project's 78 new residents), there could be greater indirect impacts on habitat resulting from human use, as residents use the adjacent open space areas for unofficial recreation (similar to what has been occurring in the area). Market-rate unit development would also require mitigation for biological resource impacts, which would require dedication of easements to preserve the balance of the area (including the areas not developed for housing zoned MDR as well as the approximately 5.5 acres designated open space and zoned RC/10).

Climate Change

The climate change impacts of market-rate residential development on Area D would likely be similar to the Project. Like the Project, GHG emissions would occur during residential construction and from operation/use of new housing; emissions could be reduced through construction BMPs and design features to reduce operational GHG emissions.

Cultural Resources

The cultural resources impacts of market-rate residential development on Area D would be similar to the Project. Like the Project, construction-related grading and excavation during market-rate unit development could result in the disturbance of previously undiscovered archaeological resources, paleontological resources, and human remains. Buildout of Area D could result more risk because the disturbance footprint would be larger.

Geology, Seismicity, and Soils

The impacts of market-rate residential development on Area D would be similar to the Project. Grading and excavation could result in substantial soil erosion, loss of topsoil, and sedimentation

during construction but these impacts can be addressed through standards conditions of approval and California Building Code requirements.

Hydrology and Water Quality

The impacts of market-rate residential development on Area D would be similar to, but could be slightly greater than, those identified for the Project.

Area D buildout would alter drainage patterns with development of up to 31 residential lots (an average size of 0.25 acre each) spread over 4.4 acres, compared to one 2.7-acre footprint. This could result in a greater increase in impervious surface and greater amount of stormwater runoff. Based on the Project's ratio of new impervious surface on the 2.7-acre footprint, buildout could result in 81,953 sf of new impervious surface on the 3.4 acres of disturbance. As described for the new residential lots in the Pebble Beach Company Project EIR (Monterey County 2011/2012), each individual residential lot would likely include a closed detention facility, and detention facilities would be designed and use meters to control release flows, in compliance with MCWRA regulations. Like the Project, it is likely a new storm drain would be installed (to collect the flows) and cross beneath SFB Morse Drive and discharge to the Sawmill Gulch drainage.

Like the Project, Area D buildout could degrade surface water quality due to an increase in sediment and pollutant loading in stormwater drainage during construction. This could be less intense at any one time under Area D buildout as construction would likely be spread out overtime, reducing the intensity. However, development could be located west of SFB Morse Drive, closer to the Sawmill Gulch drainage, which could result in more impacts than the Project, although project-level mitigation can likely address any such impacts.

Land Use and Recreation

The land use and recreation impacts of market-rate residential development on Area D would be similar to the Project, but could be slightly greater for recreation.

Similar to the Project, Area D buildout would be consistent with the existing zoning and land use designations for the site, and would be compatible with the surrounding land uses. Buildout with single family homes would be more similar to the Pebble Beach residences to the north and west and to the Del Monte Park residences to the east, although less dense than the Del Monte Park neighborhood.

Buildout of Area D would generate approximately 92 new residents, compared to the Project's 78 new residents, which could result in a greater increase in the demand for recreational facilities and the use of existing recreational facilities in the area. Thus, impacts related to recreational demand and open space quality and quantity would be similar to, but could be slightly more than, the Project.

Noise and Vibration

The noise impacts of market-rate residential development on Area D would be similar to the Project, but could be slightly less for construction and slightly more for operation.

The construction noise could be less than the Project because the 31 units could be constructed individually over a longer time period, generating less noise during each individual construction period. Once built out, the vehicular traffic from 31 units and 92 residents would be greater than the

Project with 24 units and 78 residents, but traffic generation would still be limited and would not likely result in substantial operational noise increases.

Public Services and Utilities

The public services and utilities impacts of market-rate residential development on Area D would be similar to the Project, but could be slightly more because buildout could result in 31 units with 92 residents, which could create a greater need for police and fire protection, increase in student enrollments, and increase in need for wastewater treatment and solid waste service compared to 24 units with 78 residents. However given existing capacities, significant impacts are not expected like the project.

Transportation and Circulation

The transportation and circulation impacts of market-rate residential development on Area D would be similar to the Project, but could be slightly less for construction and slightly more for operation.

The construction-related traffic could be less than the Project because the 31 units could be constructed individually over a longer time period, resulting in less contribution to intersections and roadways already operating below acceptable levels. However, once all 31 units are constructed and occupied, there would be more vehicular traffic added to roadways and intersections already operating at unacceptable levels and more pedestrians walking along roadways.

Water Supply and Demand

The water supply impact of market-rate residential development on Area D would be similar to the Project, but could be slightly more.

Area D buildout would result in more housing units and residents than the Project. Compared to the Project's 24 units and 78 residents, buildout would result in 31 units and 92 residents. This would result in a greater demand for potable water and water for landscaping. Using the prior PBC buildout project EIR estimates for lots < 0.5 acres, market rate units could demand approximately 0.5 Acre-feet (AF) per unit and 32 units could have a water demand of 16 AF, compared to the Proposed Project's demand of 6 AF.

Like the Project, this demand could be accommodated through use of a portion of the Applicant's water entitlement. As discussed in Appendix H, there is a remaining 52 AF of the Applicant's water entitlement that can be used for benefited residential properties. Thus, there is an adequate amount of water entitlement for market-rate residential units at Area D. However, given the uncertain nature of regional water supplies, it would be a significant and unavoidable impact, like the Project, as discussed in Section 3.12, *Water Supply and Demand*.

Potential Combined Impacts of In-Lieu Fee and Area D Buildout

The analysis above described the impacts of development of inclusionary housing units at some other location in the GMPAP (as they can be understood without knowing a location) and of market rate residential development of Area D compared to the Project development at Area D. In concept, the No Project Alternative could result in up to 55 new residential units (24 inclusionary housing units somewhere in the GMPAP and up to 31 market-rate units at Area D).

The combined impacts of a higher level of buildout than the Proposed Project would result in higher impacts to air quality, GHG emissions, cultural resources, geology, soils and seismicity, hydrology and water quality, land use and recreation, noise and vibration, and public services and utilities, and construction traffic. However, these impacts are likely mitigable to an overall less than significant level like the Proposed Project.

The combined impacts of the No Project Alternative on biological resources would be higher than the Project even if the in-lieu fee results in construction of inclusionary housing units on a location with no biological resources. This is because the construction of market-rate units on the Area D site would likely result in higher direct biological impacts and because the Old Capitol site would not be dedicated in its entirety as with the Proposed Project.

The combined operational traffic impacts of the No Project Alternative would be slightly higher than the Project in relation to traffic impacts on certain failing roadway locations including portions of SR 68 and SR 1 and these significant unavoidable impacts would be higher than with the project.

The combined water supply impacts of the No Project Alternative would be slightly higher than the Project even if water can be legally provided to off-site inclusionary housing development. Presuming the off-site inclusionary housing development would result in the same water demand as the Proposed Project (6 AF), market-rate residential development at Area D for up to 31 units would result in water demand of 16 AF, the total water demand would be 22 AF. This is less than the remaining amount (52 AF) of the Applicant's water entitlement that could be transferred to benefitted residential properties. However, as discussed in Section 3.12, *Water Supply and Demand*, there would be certain significant and unavoidable impacts of additional water demand at this time given the regional water supply situation, and these would be higher with the No Project Alternative than the Proposed Project due to a higher level of buildout.

Alternative 2 – Sunset Drive/17-Mile Drive

Alternative Characteristics

24 Inclusionary Housing Units at Sunset Drive/17-Mile Drive

Under this offsite alternative, 24 units of inclusionary housing would be constructed at the southwest corner of Sunset Drive and 17-Mile Drive, located approximately 1 mile north of the Project site, within the city limits of Pacific Grove (**Figures 5-1** and **5-2**). The site is owned by Pebble Beach Company with an entitlement to water service. Existing uses on the site include vacant gas station/market and PBC corporation facilities. The development footprint would be approximately 1.6 acres of the developed/paved portion of the property to avoid tree removal and encroachment into the coastal zone to the south.

The site is outside the coastal zone and currently zoned C-2, Heavy Commercial District, which allows residential uses with a use permit. The density allowed on this site is equivalent to the density allowed by the general plan residential land use category nearest to the site. The area to the east of this site has land use designation MDR17.4 which allows 17.4 units per acre. Therefore, up to 17.4 units per acre are allowed on this site with a use permit.

The 1.6-acre site could accommodate the same development specifications as the Project site including 24 units in four 2-story buildings, with 6 dwelling units each (**Table 5-2**). The density would be 15.4 units per acre. The landscaping plan would include trees and shrubs along 17-Mile

Drive and Sunset Drive. Refer to **Table 5-3** for a comparison of the development features with the Proposed Project and other build alternatives.

Adjacent land uses include the PBC training center and maintenance facilities to the west and southwest, forested open space to the south and southeast, and recreational open space (Spanish Bay golf course) further southeast. The site is bound by Sunset Drive and 17-Mile Drive to the north and east, respectively. Land uses across the roadways to the north and east include residential areas, as well as a church to the east.

Table 5-2. Development Assumptions for Alternative 2

Alternative Feature	Number	Each Unit (sf)	Total
Residential Units			
Two-bedroom units	16	1,078	--
Three-bedroom units	8	1,343	--
Total Units	24	--	27,992 sf
Residential Buildings	4[a]	3,630[b]	*0.5 acres*[c]
Parking			
Parking Spaces	58	300[d]	0.4 acres (17,400 sf)
Planter Islands	--	--	0.1 acres (2,600 sf)
Subtotal	--	--	*0.5 acres*
Landscaping/Walkways	--	--	*0.6 acres*[e]
Total Site	--	--	**1.6 acres**

Notes:

[a] Each building would have 6 housing units comprising two 3-bedroom units and four 2-bedroom units.

[b] Each residential building would have a 3,630 sf (0.08) footprint and would have 6,998 sf total floor area.

[c] The total acreage was rounded up to 0.5 acres to be conservative.

[d] Assumes 200 sf per parking space and 100 sf per parking space for the drive aisle.

[e] The residential buildings and parking take up 1.0 acres of the 1.6-acre site. Therefore, there would be 0.6 acres remaining for landscaping and walkways.

Source: Assumptions are based on size specifications for the Project's residential structures and Monterey County requirements for parking (Lorentz pers. comm.)

Area D Buildout

As described under Alternative 1 – No Project, if the 24 inclusionary housing units are not constructed as proposed, Area D could be developed with up to 31 market rate units in accordance with the current zoning. Refer to the "Area D Buildout" discussion under "Alternative 1 – No Project, Alternative Characteristics.

Figure 5-2
Alternative 2, Sunset Drive/17-Mile Drive

Table 5-3. Summary Comparison of Project Alternative Features

		Alternative				
Features	**Proposed Project**	**2. Sunset Drive/ 17-Mile Drive**	**3. Corporate Yard**	**4. Collins Residential Area**	**5. Reduced Density On-Site**	**6. Reduced Units On-Site**
Development Footprint	2.7 acres	1.6 acres	2.4 acres	2.6 acres	7.7 acres	2 acres
Inclusionary Housing Units	24	24	18	24	24	18
Distribution of units in buildings	Six units in four 2-story buildings	Six units in four 2-story buildings	Six units in three 2-story buildings	Six units in four 2-story buildings	24 single-family 1-story units	Six units in three 2-story buildings
Each 2-story building:	Two 3-bedroom units (1,343 sf each) Four 2-bedroom units (1,078 sf each) Total 6,998 sf Maximum height 22'11"	Same as Proposed Project	Two 3-bedroom units (1,475 sf each) Four 2-bedroom units (1,250 sf each) Total 7,950 sf Maximum height same as Proposed Project	Same as Proposed Project	Not applicable	Same as Proposed Project
Total parking spaces	67	58	54	58	Not applicable (driveways would be used)	54
Manager's office building	431 sf	None	670 sf	431 sf	None	431 sf

Impact Analysis

The impact analysis below focuses on the environmental impacts of constructing 24 inclusionary housing units at the Sunset Drive/17-Mile Drive site, in comparison to constructing the units at the Project site. As summarized in **Table 5-4**, in comparison with the Project, impacts at the Sunset Drive/17-Mile site would be:

- Less for biological resources,
- More for hazardous materials, and
- Similar for other resource topics, with some slightly less and some slightly more.

For impacts associated with potential future development of the Project site in accordance with current zoning, refer to the "Potential Impacts of Project Site Buildout" discussions by resource topic under "Alternative 1 – No Project, Impact Analysis".

Overall, impacts would be similar to but greater than those identified for the Project because there would be direct impacts from developing 24 units at the Sunset Drive/17-Mile Drive site and potential indirect impacts in Area D, which could be developed with up to 31 units in accordance with existing zoning.

Aesthetics

This alternative would change the visual character of the site by demolishing the existing vacant gas station/market and corporation facilities and by constructing of 24 inclusionary housing units and associated parking, which would intensify the land uses on site. The building heights would be higher than some of the buildings on the existing site. There would be views of the site from the residences located on the north side of Sunset Drive. The alternative site is also located along 17-Mile Drive, which is a scenic highway. Compared to the Project, some viewers would perceive the change in visual character as greater than that of the Project, while other viewers would perceive the change as lesser given that the existing aesthetic qualities of the site as a paved area with commercial/light industrial character uses are not particularly high.

There is a low level of existing light in the area from the street light located at the intersection and existing nearby development. The increased intensity of the site would increase impacts related to light and glare. The landscaping along the perimeter of the site would help to buffer views from the nearby residences and from users on the scenic highway, although perhaps not as effectively as the forested buffer at the Project site. Due to the proximity to the scenic highway and the residences along Sunset Drive, aesthetic impacts would likely require mitigation similar to the Project (infill planting to screen views). Furthermore, additional mitigation may be required because the County's Condition of Approval PD014(A), requiring exterior lighting to be down-lit to control offsite glare, would not apply.

Given the existing visual character of the site is not as high as the Monterey pine forest in Area D, the direct aesthetic impact of placing inclusionary housing at the Alternative 2 site would be less than that of the Project.

Table 5-4a. Comparison by Resource Topic of Environmental Impacts of Project Alternatives and Proposed Project Related to Inclusionary Housing Units Only.

		Project Alternatives[1]					
Resource Topic	**Proposed Project**	**1. No Project[2, 3]**	**2.Sunset Drive/17-Mile Drive[3]**	**3.Corporation Yard[3]**	**4.Collins Residential Area[3]**	**5. Reduced Density On-Site[3]**	**6. Reduced Units On-Site[3]**
Aesthetics	LTSM	Likely similar, possibly more or less	Less	Similar, but less	Similar	Similar, may be more or less depending on individual perception	Similar, but slightly less
Air Quality	LTS	Likely similar	Slightly more for construction due to demolition	Similar, but more for construction	Similar, but slightly less for construction	Similar, but slightly more during construction	Similar, but slightly less
Biological Resources	LTSM	Unknown, possibly more or less	Less	Less	Less	Similar, but more due to dispersed development	Similar, but slightly less
Climate Change	LTSM	Likely similar	Similar	Similar, but slightly less	Similar	Similar, but slightly more during construction	Similar, but slightly less during construction
Cultural Resources	LTS	Likely similar	Similar, but slightly less for archeology	Similar, but slightly less	Similar	Similar, but slightly more during construction.	Similar, but slightly less
Geology, Seismicity, Soils	LTSM	Likely similar	Similar for geology/soils, but more for hazardous materials	More	Similar	Similar, but slightly more during construction	Similar, but slightly less
Hydrology and Water Quality	LTS	Unknown, likely similar, possibly more or less	Similar, but less	Similar	Similar	More due to dispersed development	Similar, but slightly less
Land Use and Recreation	LTS	Unknown	Similar, but slightly less	Similar	Similar, but slightly less	Similar, but slightly less	Similar, but slightly less
Noise and Vibration	LTSM	Likely similar	Similar	Less	Similar, but slightly less	Similar	Similar, but slightly less
Public Services and Utilities	LTS	Likely similar	Similar, but slightly less for wildland fire hazard	Similar, but slightly less	Similar, but slightly less	Similar	Similar, but slightly less
Transportation and Circulation	SU	Likely similar and possibly more or less	Similar for traffic, but better transit access	Similar for operational traffic, but more for construction traffic and worse transit access.	Similar for traffic, but potential better for access to transit/employment areas.	Similar	Similar, but slightly less
Water Supply and Demand	SU	Water supply may not be available	Similar	Similar	Similar	Similar	Similar

Notes:

1 Refer to the text in Chapter 5 under "Alternative Characteristics" and the summary description in Table 5-1.

2 Location of housing unknown but assumed in GMPAP.

3 Impact summary does not include indirect impacts of paying an in-lieu fee for six units (under Alternatives 3, 6) or the development of Area D in accordance with current zoning (Alternatives 2, 3, 4). See Table 5-4 b which includes these.

LTS = Less than significant impact without mitigation; LTSM = Less than significant impact with mitigation; SU = Significant and unavoidable impact (even with mitigation).

Table 5-4b. Comparison by Resource Topic of Environmental Impacts of Project Alternatives and Proposed Project Including both Inclusionary Housing Units and Area D buildout

		Project Alternatives[1]						
Resource Topic	**Proposed Project**	**Area D Buildout Only (Alternatives 1, 2,3 and 4)[2]**	**1. No Project[3, 4]**	**2.Sunset Drive/17-Mile Drive[4]**	**3.Corporation Yard[4]**	**4.Collins Residential Area[4]**	**5. Reduced Density On-Site[5]**	**6. Reduced Units On-Site[4]**
Aesthetics	LTSM	Similar	Similar	Similar	Similar	Similar	Similar, may be more or less depending on individual perception	Similar but less on-site
Air Quality	LTS	Similar, likely less for construction and slightly more for operation	Operational emissions higher due to larger buildout	Operational emissions higher due to larger buildout	Operational emissions higher due to larger buildout	Operational emissions higher due to larger buildout	Similar, but slightly more during construction	Similar, but less on-site and same regionally
Biological Resources	LTSM	More	More due to higher impacts at Area D and due to no dedication of Old Capitol	More due to higher impacts at Area D.	More due to higher impacts at Area D.	More due to higher impacts at Area D.	More than the project	Similar, but less on-site
Climate Change	LTSM	Similar, likely less for construction and more for operation	Higher GHG emissions due to larger buildout	Higher GHG emissions due to larger buildout	Higher GHG emissions due to larger buildout	Higher GHG emissions due to larger buildout	Similar, but slightly more during construction	Similar, but less on-site and same regionally
Cultural Resources	LTS	Similar	Similar	Similar	Similar	Similar	Similar, but slightly more during construction.	Similar, but slightly less on-site
Geology, Seismicity, Soils	LTSM	Similar, slightly less for construction	Similar	Similar	Similar	Similar	Similar, but slightly more during construction	Similar, but slightly less on-site
Hydrology and Water Quality	LTS	Similar, possibly more	Similar	Similar	Similar	Similar	More due to dispersed development.	Similar, but slightly less on-site
Land Use and Recreation	LTS	Similar, less dense development, but more units.	Similar (compatible at inclusionary housing site, but less dense development and more units at Area D)	Similar (compatible at inclusionary housing site, but less dense development and more units at Area D)	Similar (compatible at inclusionary housing site, but less dense development and more units at Area D)	Similar (compatible at inclusionary housing site, but less dense development and more units at Area D)	Similar, but slightly less due to lower density	Similar, but slightly less on-site
Noise and Vibration	LTSM	Similar, possibly less for construction and slightly more for operation	Similar, but higher overall traffic noise due to larger buildout	Similar, but higher overall traffic noise due to larger buildout	Similar, but higher overall traffic noise due to larger buildout	Similar, but higher overall traffic noise due to larger buildout	Similar	Similar, but slightly less onsite and same for regional traffic noise
Public Services and Utilities	LTS	Similar	Similar, but slighter higher demands with larger buildout	Similar, but slighter higher demands with larger buildout	Similar, but slighter higher demands with larger buildout	Similar, but slighter higher demands with larger buildout	Similar	Similar, but slightly less on-site demands and same regionally
Transportation and Circulation	SU	Similar, possibly less for construction and slightly more for operation	More traffic due to larger buildout.	More traffic due to larger buildout.	More traffic due to larger buildout.	More traffic due to larger buildout.	Similar	Similar, but slightly less on-site and same for traffic regionally
Water Supply and Demand	SU	Similar, slightly more	Higher water demand due to larger buildout	Higher water demand due to larger buildout	Higher water demand due to larger buildout	Higher water demand due to larger buildout	Similar	Similar

Notes:

1 Refer to the text in Chapter 5 under "Alternative Characteristics" and the summary description in Table 5-1.

2 Area D (where the Project site is located) development per current zoning which allows up to 31 market rate units on 4.4 acres. Impacts are relative to Proposed Project impacts on Area D.

3 Location of housing unknown but assumed in GMPAP.

4 Impact summary includes inclusionary housing impacts plus indirect impacts of paying an in-lieu fee for six units (under Alternatives 3, 6) and/or the development of Area D in accordance with current zoning (Alternatives 2, 3, 4).

5 This alternative would not result in any use of an in-lieu fee or any off-site development and thus all impacts are the same as in Table 5-4a and all occur in Area D.

LTS = Less than significant impact without mitigation; LTSM = Less than significant impact with mitigation; SU = Significant and unavoidable impact (even with mitigation).

Air Quality

The air quality impacts would be similar to, but slightly greater than, those identified for the Project.

Construction-related emissions include PM10 from grading and construction and diesel TACs from trucks and equipment. This alternative also requires demolition of the existing structures and parking area on the site. This alternative would construct a similar development as the Project so construction emissions, aside from the demolition phase, and operational emissions would be similar.

Biological Resources

The biological resources impacts would be less than those identified for the Project.

The development footprint is developed and disturbed with no vegetation, except existing landscaping along Sunset Drive and 17-Mile Drive, including a mature cypress tree. There are no natural drainage features or waters. Although there is undeveloped forest adjacent to the south, there is no Monterey pine forest or habitat for special-status plants or wildlife on the development site, and there would be no tree removal, other than possibly limited landscaped tree removal. Due to the proximity of the forested land to the south, adding residential uses at the site would likely increase trespassing or unofficial use of the site for recreation, which could degrade the forest and habitat. However, the impact to biological resources would be substantially less than that of the Project given no direct removal of habitat and a less sensitive location.

Climate Change

The climate change impacts would be similar to those identified for the Project.

Like the Project, GHGs emitted during construction and from operation could contribute to climate change impacts. Construction would generate emissions from mobile and stationary construction equipment exhaust and employee and haul truck vehicle exhaust. This alternative would have a similar amount of permanent development as the Project. Therefore, vehicle trips and electricity generation and consumption, waste and wastewater generation, and water use would be comparable. As a result, this alternative would generate similar direct and indirect GHG emissions as the Project.

Cultural Resources

The cultural resource impacts would be similar to, but slightly less than, those identified for the Project for archaeology and human remains, but slightly greater for historic architecture.

Regarding archaeology, subsurface construction activities could damage unknown or previously undiscovered archaeological resources or human remains. However, unlike the Project site, this alternative site has been heavily disturbed by development. Therefore, although possible, it is less likely that unknown cultural resources would be discovered.

Regarding historic architecture, there are existing buildings on this alternative site. Because a detailed analysis has not been conducted, the age and architectural significance of these buildings is unknown at this time although it is considered unlikely that the buildings could have historic significance. Therefore, impacts related to historic resources would be similar to that of the Project.

Geology, Seismicity, and Soils

The impacts would be similar to those identified for the Project regarding geology, seismicity and soils, but greater for hazardous materials.

This alternative site is in relatively close proximity to the Project site, so impacts related to seismic hazards would be similar. The soils on this alternative site are Tangair Fine Sand, 2-9% slopes soils, like those at the Project site. Therefore, impacts related to erosion and soil constraints would be similar to those of the Project. Similarly, this alternative site is relatively flat, so impacts related to landslides and slope stability would be similar to the Project.

The potential impact would be greater than those identified for the Project. This alternative would include demolition of existing buildings and pavement which could contain hazardous materials. Additionally, there is an open leaking underground storage tank (LUST) cleanup site on this alternative site. A cleanup action plan was approved in 2009 and is still being implemented. Therefore, impacts related to hazardous materials would be greater under this alternative but would be mitigable with completion of any necessary site remediation.

Hydrology and Water Quality

The hydrology and water quality impacts would be similar to, but less than, those identified for the Project.

The Sunset Drive/17-Mile Drive site is located within the Moss Beach Watershed. Per FEMA mapping, it is not within the designated 100-year floodplain. The site is not within a designated groundwater basin used for groundwater supply.

The north portion of this site is currently impervious surface (except for the small areas of landscaping), and the far south portion of the site is pervious (an unpaved dirt area near the City limits). There are no natural drainages extending through or adjacent to the site. Stormwater runoff currently drains as surface flow to the adjacent streets and the gutter collection near the existing driveway on Sunset Drive, which carries the water eastward to an underground culvert.

The 1.6-acre site is already graded flat and predominately paved, so there would be no substantial changes in drainage patterns at the site. The Project would result in perhaps 0.5 acres of new impervious surface (assuming approximately one-third of the development is on the unpaved area and two-thirds on the paved area). This alternative includes a similar development footprint as the Project because the buildings would be the same size. However, there would be less paved area for roadway/parking because there would be slightly fewer parking spaces (58 instead of 67), and a roadway into the site would not be required. Therefore, this alternative would result in less new impervious area overall, and a smaller percentage of the site would be converted from pervious to impervious surface. The residential development would need to include a drainage plan with a stormwater collection system, including oil/water separator below the parking lot, and a closed detention facility underground[5] (because there is not likely room for an aboveground retention basin) that releases regulated flow to the existing drainage system.

Additionally, there would be less potential to impact regulated waters because there are no waters or drainages on the site.

[5] Monterey County Water Resources Agency requires that stormwater detention facilities are sized to limit the 100-year post-development runoff rate to the 10-year pre-development rate (see Regulatory Setting in Section 3.7).

Land Use and Recreation

The land use and recreation impacts would be similar to, but slightly less than, those identified for the Project.

Similar to the Project, this alternative would be compatible with the surrounding land uses given the residential development and open forest located near the site. The adjacent PBC training center (offices) to the west and maintenance facilities (corporation yard) generate some daytime noise but are generally quiet in the evening. Additionally, this alternative would be consistent with the governing Pacific Grove general plan and zoning designations, with a use permit.

Similar to the Project, this alternative would generate approximately 78 new residents who could increase the demand for recreational facilities. Therefore, impacts related to recreational demand and open space quality and quantity would be similar to the Project. New residents would have access to footpaths and connector trails along 17-Mile Drive.

Noise and Vibration

The noise and vibration impacts under this alternative would be similar to, but slightly greater than, those identified for the Project.

Construction would require the use of heavy equipment which would temporarily increase noise levels at properties near the work site. Noise levels at a given time during construction would be similar to the levels expected under the Project. The closest sensitive receptors to this alternative site are residences located on the north side of Sunset Drive, approximately 60 feet from the site (the nearest residences to the Project site are 50 feet away. However, construction noise mitigation would be similar as prescribed for the Project.

Operation of this alternative would be similar to the Project. The prior PBC buildout EIR studied traffic noise at the Congress/SR 68 intersection which has similar traffic conditions to the 17-mile Drive/Sunset Drive intersection and found that existing and future cumulative noise levels would be slightly less than 60 dBA which is a generally acceptable level for residential use. While introducing additional residential noise would be increase noise levels slightly, it is not expected that the existing noise levels would change substantially with this Alternative. Therefore, this impact would be similar to the Project.

Public Services and Utilities

The public services and utilities impacts would be similar to, but slightly less than, those identified for the Project.

Like the Project, this alternative would generate 78 new residents to the area. Therefore, this alternative would result in similar increased demand for and impacts to public services and utilities as the Project. However, the service providers would be different for fire protection (Monterey City Fire Department), police protection (Pacific Grove Police Department), and wastewater collection and treatment (Monterey Regional Water Pollution Control District). The service providers would be the same for schools, gas, electricity, and solid waste collection. Therefore, although some service providers would be different, it is anticipated that this alternative would result in similar impacts on public services and utilities as the Project. The potential risks associated with wildland fire hazards would be slightly less because the alternative site is located further from the large open space

preservation areas to the south within Pebble Beach, whereas the Project site is adjacent to the HHNHA.

Transportation and Circulation

The transportation and circulation impacts would be similar to, but slightly less than, those identified for the Project, because access to transit would be better.

This alternative would result in similar construction-related traffic because it would include similar construction activities as the Project. Haul trucks would use Sunset Drive instead of SFB Morse Drive.

This alternative would likely generate a similar number of daily trips as the Project (better transit access is only expected to affect trip generation slightly), but the trips would be distributed to different roadways and intersections. Similar to the Project, this alternative would add trips to the Sunset Drive (SR 68)/Congress Road intersection that is projected to operate at LOS D in the AM and PM in 2030 (Monterey County 2011/2012). This alternative could also add trips to additional intersections, not identified in the Project's analysis. Overall, this alternative would likely also result in significant and unavoidable impacts to certain regional roadway locations along SR 68 and SR 1, like the Project.

This alternative has better access to public transit than the Project because it is closer to MST bus routes, including Route 21 which could transport Pebble Beach employees directly into Pebble Beach. Route 1 (Asilomar) and Route 21 (Pebble Beach-Salinas Express) extend through the intersection of Sunset Drive/17-Mile Drive where this site is located. In comparison, the closest routes to the Project site are Route 2 (Pacific Grove-Del Monte Center) approximately 0.15 mile east of the Project site and Route 21 approximately 0.7 mile north of the site.

Water Supply and Demand

The water supply impacts would be similar to those identified for the Project.

This alternative would result in similar demand for potable water, so the overall impact of this alternative would be the same as the Project, including the significant unavoidable impacts related to project water demand in the event of no new regional water supply and related to indirect impacts associated with new regional water supply development.

Potential Combined Impacts of Inclusionary Housing Development at the Sunset Drive/17-Mile Drive and Area D Buildout

The analysis above described the impacts of development of inclusionary housing units at the 17-mile Drive/Sunset Drive location. As noted previously, this alternative would also leave the potential for market rate residential development of Area D. In concept, this alternative could result in up to 55 new residential units (24 inclusionary housing units at 17-Mile Drive/Sunset and up to 31 market-rate units at Area D).

The combined impacts of a higher level of buildout than the Proposed Project would result in higher impacts to air quality, GHG emissions, cultural resources, geology, soils and seismicity, hydrology and water quality, land use and recreation, noise and vibration, and public services and utilities, and construction traffic. However, these impacts are likely mitigable to an overall less than significant level, like the Proposed Project.

The combined impacts of this alternative on biological resources would be higher than the Project, because the construction of market-rate units on the Area D site would likely result in higher direct biological impact. However, as with the Proposed Project, the Old Capitol site would be dedicated in its entirety since this alternative would include construction of inclusionary housing units.

The combined operational traffic impacts of this alternative would be slightly higher than the Project in relation to traffic impacts on certain failing roadway locations, including portions of SR 68 and SR 1. These significant unavoidable impacts would be higher than with the project.

The combined water supply impacts of the No Project Alternative would be slightly higher than the Project given the higher amount of buildout, but both the inclusionary housing at the 17-Mile Drive/Sunset Drive location and the market-rate units at Area D could utilize the Applicant's water entitlement.

Alternative 3 – Corporation Yard

Alternative Characteristics

18 Inclusionary Housing Units at the Corporation Yard

Under this offsite alternative, 18 units of inclusionary housing would be constructed at the Pebble Beach Company Corporation Yard, located on Haul Road near the Sunridge Road/Lopez Road intersection, approximately 1 mile south of the Project site (**Figures 5-1** and **5-3**). The site is within the unincorporated community of Pebble Beach and owned by Pebble Beach Company with an entitlement to water service. The site is currently within the coastal zone and designated MDR-B-6-D in the Del Monte Forest LCP (MDR allows up to 4 units/acre).

The 22.5-acre Corporation Yard is currently disturbed and developed with PBC offices, maintenance facilities, and outdoor stockpiles (greenwaste, composting, recycling). Additionally, it is a former quarry site (opened in 1969 and closed in 2007), and a portion of the quarry was used as an unsupervised landfill, full of inert debris (wood chunks, metal, plastic, concrete, etc.).

On the disturbed but undeveloped portion (where there are maintenance facilities and stockpiles), planned and approved land uses include 10 market rate units on 4.7 acres with a roadway on 1.9 acres for a 6.6-acre development footprint[6]. The PBC offices in the south portion of the site would remain in use. Maintenance activities would continue to occur, but the activities and stockpiles would be relocated from the site to an area east of the offices. A landscaped berm would be installed along the south side of the residential development footprint to provide a buffer from activity in the corporation yard.

With this alternative, the 6.6-acre development footprint for the 10 market rate units would be reconfigured, such that the 10 market rate units are on 2.3 acres, the 18 inclusionary units and 54 parking spaces are on 2.4 acres, and the roadway in between on 1.93 acres, approximately (**Figure 5-3**). The size of the market rate lots would change from an average of 0.47 acre per lot to an average of 0.23 acre per lot.

[6] This project, developing 10 market rate units at the Corporation Yard, was analyzed in the Pebble Beach Company Project EIR (Monterey County 2011/2012).

The 18 inclusionary housing units would be in three two-story buildings with six units each, and the development area would include a manager's office, landscaping, and 54 surface parking spaces. The development footprint would not require tree removal. Refer to **Table 5-3** for a comparison of the development features with the Proposed Project and other build alternatives.

Adjacent land uses include the PBC maintenance offices to the south and HHNHA open space preservation areas to the north, east and west. There are a few single family residential areas further to the west between Sunridge Road and Lopez Road.

In-Lieu Fee

Additionally, because this alternative only includes 18 inclusionary housing units, an in-lieu fee would be paid to the County instead of developing an additional 7 inclusionary units.[7]

Area D Buildout

As described under Alternative 1 – No Project, if the 24 inclusionary housing units are not constructed as proposed, Area D could be developed with up to 31 market rate units in accordance with the current zoning. Refer to the "Area D Buildout" discussion under "Alternative 1 – No Project, Alternative Characteristics".

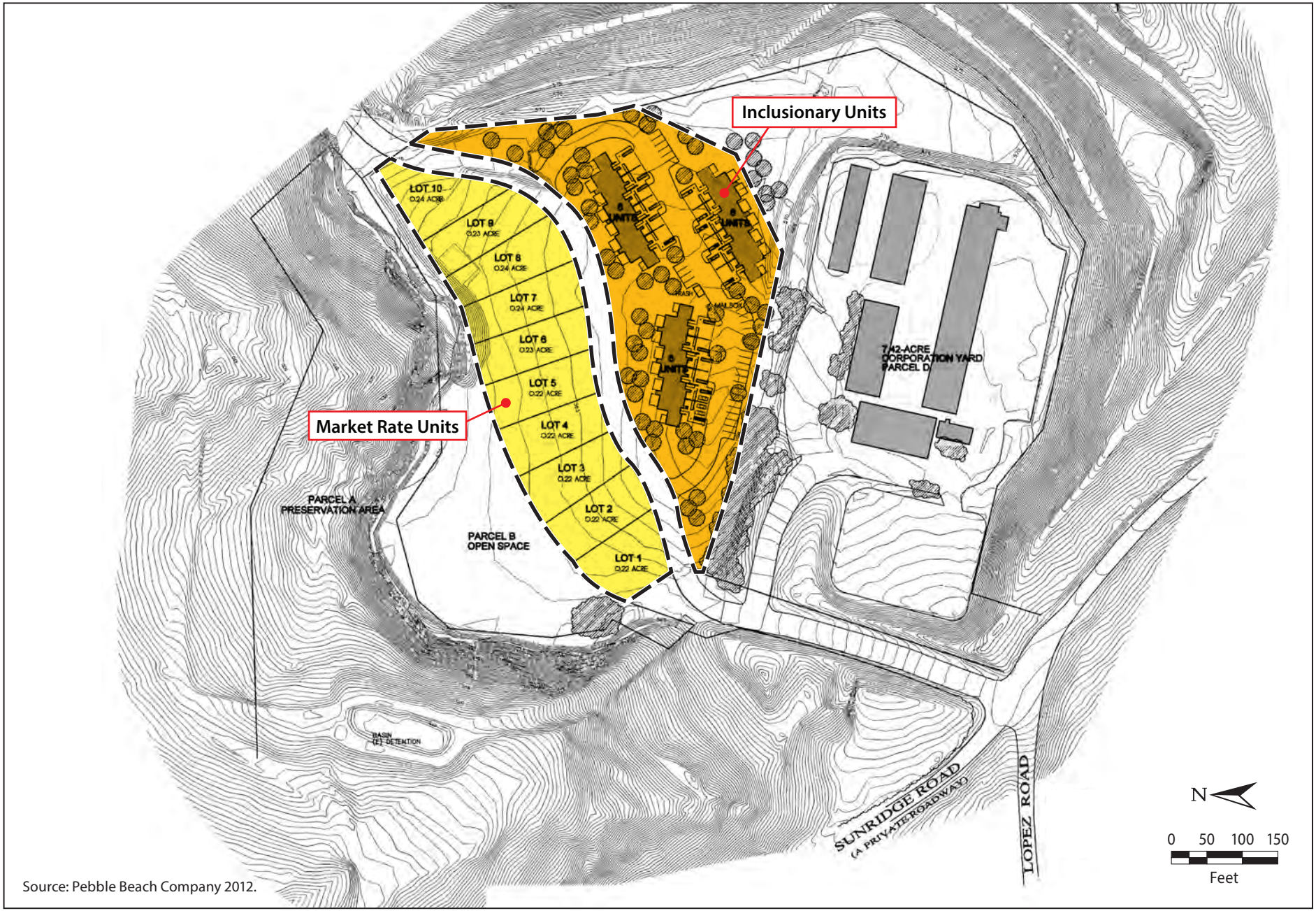
Impact Analysis

The impact analysis below focuses on the environmental impacts of constructing 18 inclusionary housing units at the Corporation Yard, in comparison to constructing the units at the Project site. This analysis is partially based on information in the Pebble Beach Company EIR, which evaluated 18 inclusionary units at the Corporation Yard (Monterey County 2011/2012). As summarized in **Table 5-4**, in comparison with the Project, impacts at the Corporation Yard site would be:

- Less for biological resources and noise/vibration,
- More for geology/soils/hazardous materials, wildland fire hazard, construction-related air quality, traffic; and
- Similar for other resource topics, with some slightly less and some slightly more.

Payment of the in-lieu fee for 7 units may result directly or indirectly in construction of inclusionary housing in locations outside Pebble Beach but within the GMPAP. However, given the multiplicity of uses to which in-lieu fees are used by the County to support inclusionary housing, it is speculative to conclude precisely if and where such units might be built. When and where the County proposes inclusionary housing projects, it complies with CEQA at the time such projects are defined and actually proposed. For general discussions by resource topic, refer to the "Potential Impacts of Paying In-Lieu Fee" under "Alternative 1 – No Project, Impact Analysis".

[7] As described in Chapter 1, *Introduction*, under Background, Condition No. 18 of the Pebble Beach Company Project (buildout project) requires construction of 18-25 inclusionary housing units for the approved 90-100 residential lots. Because the proposed project being evaluated in this EIR includes 24 inclusionary units, PBC would pay the County an inclusionary fee for one unit if and when it builds out all 100 lots; and this same assumption applies to Project alternatives with 24 inclusionary units. The Project alternatives with 18 inclusionary units include an in-lieu fee for 7 additional units.



Source: Pebble Beach Company 2012.

Graphics ... 00384.14 (2-9-2015)

Figure 5-3
Alternative 3, Corporation Yard

Overall, impacts would be similar to but greater than those identified for the Project, because there would be direct impacts from developing 18 units at the Corporation Yard site and potential indirect impacts in Area D, which could be developed with up to 31 units in accordance with existing zoning, and at an unknown location in the GMPAP if the in-lieu fee is used to develop 7 more units.

Aesthetics

The aesthetics impacts would be similar to, but less than, those identified for the Project.

Like the Project site, this alternative site is not visible along any designated scenic vistas or corridors, including 17-Mile Drive.

The change in visual character would be less than the Project because the corporation yard site is already disturbed maintenance facilities and outdoor stockpiles (greenwaste, composting, recycling), and there are no trees to be removed. The Corporation Yard is mostly screened from view from the neighboring residential area to the west due to intervening forest. Similar to the Project, the impacts of increasing light and glare at the Corporation Yard, which is adjacent to the HHNHA open space, would be minimized by the setback, planned landscaping, and County Condition of Approval PD014(A) requiring down-lit exterior lighting.

Air Quality

The air quality impacts would be similar to, but slightly greater than, the Project.

Although slightly less construction would be required for 18 units in three buildings under this alternative, compared to 24 units in four buildings for the Project, residential development at this site requires substantially more grading. As described under "Geology, Seismicity and Soils" below, residential development at this site would require excavation of 21,091 cy which would need to be transported offsite to the Marina landfill if not used onsite. For comparison, the Project requires excavation of 3,325 which would be used onsite. Therefore, construction-related emissions (PM10 from grading and construction and diesel TACs from trucks and equipment) would be greater than the Project. Additionally, localized emissions would shift to the Corporation Yard. Additional mitigation (e.g., implementing after-market emissions control technology on on-road and off-road construction equipment and vehicles) could be required.

Operational impacts would be slightly less than the Project because there would be fewer on-site residences and thus fewer emissions from area, energy and mobile sources, including vehicular trips generated and traffic distribution and congestion at nearby roadway intersections. As discussed in Section 3.2, *Air Quality*, Project emissions (from 24-unit development) would be below MBUPACD threshold levels; therefore, Alternative 3 emissions (from 18-unit development) would be as well. Further, operational emissions from 18 inclusionary units at the Corporation Yard were quantified for the Pebble Beach Company Project Final EIR (Chapter 4, Tables 5-8 and 5-10). Criteria pollutant emissions (ROG, NOx, CO, PM10, PM2.5) were shown to be below MBUAPCD thresholds, and elevated CO concentrations from increased traffic at several intersections[8] would not exceed federal and state standards (Monterey County 2011/2012).

[8] SR 68/Skyline Forest Drive, SR 68/Carmel Hill Professional Center, SR 68/SR 1 Off-Ramp, SR 1/Carpenter Street, and Congress Road/SFB Morse Drive.

Biological Resources

The biological resources impacts would be less than those identified for the Project.

Unlike the Project site, the development footprint is developed and disturbed, and no tree removal would be required. Although the HHNHA is adjacent to the alternative site, there is no Monterey pine forest or habitat for special-status plants or wildlife on the development site. Due to the proximity of the HHNHA, there is potential for indirect effects on the HHNHA due to increased residential use of trails and increased nighttime light. However, mitigation similar to that required for the Project would address the effects of increased trail use on sensitive plant and wildlife species, by requiring measures to close and revegetate informal "social" trails, etc. (as described in Mitigation Measure BIO-B3 in the Pebble Beach Company EIR, Monterey County 2011/2012). Potential impacts from increased light would be minimized by the interior location and relative distance of the residential structures from the HHNHA, screening provided by the landscaping, and compliance with County Condition of Approval PD014(A) to ensure exterior lighting is down-lit.

Climate Change

The climate change impacts would be similar to, but slightly less than, those identified for the Project.

Like the Project, GHGs emitted during construction and from operation could contribute to climate change impacts. Construction would generate emissions from mobile and stationary construction equipment exhaust and employee and haul truck vehicle exhaust. Project operation would generate emissions from area, energy, mobile and wastewater sources. Because this alternative would develop 18 units instead of the 24 units, the vehicle trips and electricity generation and consumption, waste and wastewater generation, and water use would be slightly less. Localized emissions would be similar but would shift to the Corporation Yard area. Operational emissions from 18 inclusionary housing units at the Corporation Yard were quantified for the Pebble Beach Company Project Final EIR (Chapter 4, Tables 5-12 and 5-13, Monterey County 2011/2012). Like the Project, on their own, these emissions would not result in climate change or global warming. However, climate change is a cumulative impact. Without mitigation, these emissions would contribute to cumulative emissions. Mitigation includes reducing GHG emissions by implementing best management practices during construction and by including energy efficient building design features, new landscaping and tree planting, and/or offset purchases.

Cultural Resources

The cultural resource impacts would be similar to those identified for the Project for historic architecture, but slightly less for archaeology and human remains.

Regarding archaeology, subsurface construction activities could damage unknown or previously undiscovered archaeological resources or human remains. However, unlike the Project site, this alternative site has been heavily disturbed by former quarry operations (opened in 1969 and closed in 2007) and PBC corporation yard activities. Therefore, although possible, it is less likely that unknown cultural resources would be discovered.

Regarding historic architecture, like the Project site, there are no structures on the site that could be considered historic or architecturally significant.

Geology, Seismicity, and Soils

The impacts would be greater than those identified for the Project.

The risk of potential structure damage and associated human safety hazards from groundshaking caused by earthquakes is greater at the Corporation Yard due to the instability of the manmade fill underlying the site. Based on geotechnical evaluations, required mitigation for building on unconsolidated fill includes completely removing the existing landfill materials and reclaiming building sites with engineered fill placed in accordance with standard engineered fill procedures to provide adequate load-bearing support and adequate surface and subsurface drainage during and after construction[9].

The development site at the Corporation Yard site is flat, but there are slope stability issues due to the manmade fill. The site is identified as a "Pits and Dumps" soil unit[10]. Placing buildings on unstable soils could result in potential structure damage and associated human safety hazards. This would require the same mitigation for building on unconsolidated fill described above.

Residential development at the site would require excavation of an estimated 21,091 cy.[11] Material not used onsite (e.g., for construction of the landscape berm between the residential development and existing PBC offices) would be transported to the Marina landfill. For comparison, the Project would generate 3,325 cy which would be used onsite as fill. Therefore, this alternative would result in grading and excavation that could result in soil erosion, loss of topsoil and sedimentation. Required mitigation includes preparation of an erosion and sediment control plan. Transporting the soil offsite could create additional traffic and air quality impacts.

Although the Phase I Environmental Site Assessment (ESA) conducted for the site did not identify evidence of hazardous materials being dumped, the area is identified as an unsupervised dumping ground. Thus, there is potential for hazardous material to have been placed in the fill without the knowledge of operating personnel. Additionally, there is a potential for methane off-gassing from the fill. The potential hazardous materials and methane off-gassing could result in worker and/or resident exposure to hazardous materials or hazardous conditions. Required mitigation includes: 1) conducting a Phase II investigation and initiating any warranted remedial action, and 2) assessing the potential for methane off-gassing and incorporating methane controls and /or venting into the construction plans and project design if warranted.

Hydrology and Water Quality

The hydrology and water quality impacts would be similar to those identified for the Project.

The Corporation Yard is within the Sawmill Gulch watershed, and all drainage is currently detained by a detention basin located at the west end of the site. The detention basin releases regulated flow (ten-year pre-development flow and overflow per MCWRA requirements) overland prior to entering

[9] Haro, Kasunich and Associates, Inc 2010m from Section 3.6 of the Pebble Beach Company EIR (Monterey County 2011/2012).

[10] Soils on the Monterey Peninsula were mapped by the U.S. Department of Agriculture Soil Conservation Service during their survey of Monterey County. Cook 1978 from the Pebble Beach Company EIR (Monterey County 2011/2012).

[11] Residential development on 6.6 acres requires excavation of 58,000 cy, as described of Impact GSS-C1 in Section 3.6 of the Pebble Beach Company EIR (Monterey County 2011/2012). Based on this ratio, 2.4 acres requires excavation of 21,091 cy.

a tributary of Sawmill Gulch which flows northwest to the ocean. The site is not within the designated 100-year floodplain or within a designated groundwater basin.

The development site is currently pervious (unpaved, disturbed dirt). The estimated amount of new impervious surface is 1.7 acres or 75,750 sf (a conservative estimate not accounting for pervious landscaped areas), requiring site run-off detention of 5,392 cubic feet.[12] All drainage from the development would be hard-piped to the existing detention basin located at the west end of the development site. The existing detention basin would be increased to accommodate the additional flow, and a new overflow for the detention basin would be designed to allow for the appropriate 10-year pre-development and excessive storm event releases. For comparison, the Project would result in 65,080 sf (1.5 acres) and would include construction of a detention basin.

Unlike the Project site, the Corporation Yard site does not include any natural drainages on the site, so the impact of potential degradation to surface water quality would be substantially less. Overall, the impacts of this alternative would be similar to the Project.

Land Use and Recreation

The land use and recreation impacts would be similar to those identified for the Project.

Similar to the Project, this alternative is consistent with existing development patterns in Pebble Beach to place residential uses adjacent to open space areas. Densities at the Corporation Yard would be higher than most development in Pebble Beach, but the Corporation Yard is functionally separate from other development and well screened by forest areas. Trails within the HHNHA extend from the Corporation Yard site, and residential development on the site could increase the use of existing trails in the HHNHA, but this is considered a compatible use. The trails are buffered from residential noise with distance, topography, the 1.45-acre open space buffer (shown as Parcel B on **Figure 5-3**), and forest buffer. This alternative would not diminish the quality and quantity of open space used for recreation.

Locating residences adjacent to ongoing Corporation Yard activities could expose residences to nuisance noise, truck traffic and associated adverse visual effects. This is considered less than significant because the maintenance activities and stockpiles would be relocated to an area east of the PBC offices, further away from the residences; maintenance vehicles would enter the active Corporation Yard before entering the residential area; and there would be a landscaped berm along the south side of the residential area to minimize adverse noise and visual effects. Thus, overall the impacts would be less than significant, similar to the Project.

Noise and Vibration

The noise impacts would be less than those identified for the Project.

[12] This is based on estimates provided in Table 5-16, Chapter 4, of the Pebble Beach Company Project Final EIR (Monterey County 2012). These estimates include 36,000 sf for the three residential structures and 53,000 sf for the roadway (shown in Figure 5-3). The 53,000 sf roadway is more than would be required for just the inclusionary units, as it would also serve the 10 market rate units that were also evaluated in the Pebble Beach Company Final EIR. Therefore, it is assumed that the impervious roadway surface would be 25% (13,250 sf) less or 39,750 sf to serve just the inclusionary housing. Therefore, for this alternative the new impervious surface is estimated to be 75,750 sf (36,000 sf for residential structures + 39,750 sf for roadway/parking). The assumed roadway size is still likely larger than would be required, so this is considered a conservative estimate.

There are no known noise sensitive land uses in the immediate vicinity of the Corporation Yard. The closest residences are approximately 500 feet to the west, with forested open space in between. Therefore, unlike the Project, this alternative would not result in construction-related noise or ground-borne vibration/noise impacts that exceed established thresholds (Monterey County 2011/2012).

This alternative would expose new residents to Corporation Yard activities including the use of trucks and equipment associated with greenwaste, composting and recycling and general maintenance. As described above under "Land Use and Recreation", this impact is considered less than significant without mitigation because the maintenance activities would be relocated to an area east of the PBC offices, maintenance vehicles would enter the active Corporation Yard before entering the residential area, and the landscaped berm along the south side of the residential area would minimize adverse noise effects.

Operation of the new residences would increase noise levels in the vicinity; but as mentioned above, there is current operational noise at the Corporation Yard and no nearby sensitive receptors. Like the Project, the increase in noise levels at the site (from human voices, music, cars idling, and traffic) would be less than significant. The dominant noise source would be traffic noise. A quantified analysis was conducted for the Pebble Beach Project that included traffic noise generated by 18 new inclusionary units, plus 10 market rate units, resulting in a conservative analysis; and the impact was less than significant (Monterey County 2012).

Public Services and Utilities

The public services and utilities impacts would be similar to those identified for the Project, except the demand for and impact to services and utilities would be slightly less, and the exposure to wildland fires would be similar.

Based on the average of 3.23 persons per unit used to estimate the number of new residents for the Project (refer to Section 3.10, Impact Analysis, Methodology), this alternative would add up to approximately 58 new residents to the Pebble Beach area (the Project would generate 78). Therefore, this alternative would result in a similar, but slightly less, increase in the demand for and impacts to public services and utilities as the Project.

The Corporation Yard is surrounded with open space forest like the Project. Therefore, the exposure of people and structures to wildland fires would be similar.

Transportation and Circulation

The transportation and circulation impacts would be similar to those identified for the Project for operation, but construction traffic and access to public transit would be worse.

This alternative would result in more construction traffic than the Project. Although slightly less construction would be required for 18 units in three buildings under this alternative (compared to 24 units in four buildings for the Project), residential development at this site requires substantially more grading. As described under "Geology, Seismicity and Soils" above, residential development at this site would require excavation of 21,091 cy which would need to be transported offsite to the Marina landfill if not used onsite. For comparison, the Project requires excavation of 3,325 which would be used onsite. Haul trucks would use SFB Morse Drive and continue to Lopez Road to access the site.

Once constructed, this alternative would generate the same number of daily trips as the Project, but the trips would be distributed to different intersections. Similar to the Project, this alternative would add trips to locations already operating at unacceptable levels, such as along SR 68.

Regarding pedestrian access, this alternative would not add more pedestrians to an area identified as an existing safety hazard to pedestrians. However, pedestrians would similarly be walking along roadway edges without sidewalks.

Regarding access to transit, this alternative is farther to MST bus routes, including Route 21 (Pebble Beach Express) which is approximately 1.5 miles northwest of the site and can be accessed using Lopez Road.

Overall, this alternative would result in significant and unavoidable impacts, like the Project. Compared to the Project, construction-related impacts would be worse because of the additional haul trips, operational related impacts would be similar but distributed differently, pedestrian safety would be similar but would not exacerbate the existing safety issues along SFB Morse Drive, and access to transit would be worse.

Water Supply and Demand

The water supply impacts would be similar to those identified for the Project.

This alternative would result in similar demand for potable water and so the overall impact of this alternative would be the same as the Project, including the significant unavoidable impacts related to project water demand in the event of no new regional water supply and related to indirect impacts associated with new regional water supply development.

Potential Combined Impacts of Inclusionary Housing Development at the Corporation Yard, Payment of In-lieu Fee, and Area D Buildout

The analysis above described the impacts of development of inclusionary housing units at the Corporation Yard location. As noted previously, this alternative would also include payment of an in lieu fee (for 7 units) and leave the potential for market rate residential development of Area D. In concept, this alternative could result in up to 56 new residential units (18 inclusionary housing units at the Corporation Yard, 7 units due to the in-lieu fee and up to 31 market-rate units at Area D).

The combined impacts of a higher level of buildout than the Proposed Project would result in higher impacts to air quality, GHG emissions, cultural resources, geology, soils and seismicity, hydrology and water quality, land use and recreation, noise and vibration, and public services and utilities, and construction traffic. However, these impacts are likely mitigable to an overall less than significant level like the Proposed Project.

The combined impacts of this alternative on biological resources would be higher than the Project. This is because the construction of market-rate units on the Area D site would likely result in higher direct biological impact. However, as with the Proposed Project, the Old Capitol site would be dedicated in its entirety since this alternative would include construction of inclusionary housing units.

The combined operational traffic impacts of this alternative would be slightly higher than the Project in relation to traffic impacts on certain failing roadway locations, including portions of SR 68 and SR 1; and these significant unavoidable impacts would be higher than with the project.

The combined water supply impacts of the No Project Alternative would be slightly higher than the Project given the higher amount of buildout, but both the inclusionary housing at the Corporation Yard location and the market-rate units at Area D could utilize the Applicant's water entitlement.

Alternative 4 – Collins Residential Area

Alternative Characteristics

24 Inclusionary Housing Units at the Collins Residential Area

Under this alternative, the 24 units of inclusionary housing would be constructed at the Collins Residential Area, located at the corner of Portola Road and Alva Lane, approximately two miles southwest of the Project site (**Figures 5-1**). The site is within the unincorporated community of Pebble Beach and owned by Pebble Beach Company with an entitlement to water service. The site is currently within the coastal zone and designated MDR in the Del Monte Forest LCP (MDR allows up to 4 units/acre).

The 3.8-acre site is currently vacant and graded with no vegetation or trees. Former uses included two residences that were demolished. Planned and approved land uses at the site include four market rate housing units on 3.4 acres, with roadway on 0.4 acres, for a 3.8-acre development footprint (**Figure 5-4**). Thus, the 3.8-acre development footprint for the four market rate units would be reconfigured, such that the four market rates units are on 1.2 acres, and the 24 inclusionary units are on approximately 2.6 acres. The market rate lots would change from an average of 0.8 acre per lot to an average of 0.3 acre per lot.

The 24 inclusionary housing units would be in four two-story buildings with 6 units each, and the development area would include a manager's office, landscaping and 58 parking spaces. Refer to **Table 5-3** for a comparison of the development features with the Proposed Project and other build alternatives. The development footprint would not require tree removal.

Area D Buildout

As described under Alternative 1 – No Project, if the 24 inclusionary housing units are not constructed as proposed, Area D could be developed with up to 31 market rate units in accordance with the current zoning. Refer to the "Area D Buildout" discussion under Alternative 1, Alternative Characteristics.

Impact Analysis

The impact analysis below focuses on the environmental impacts of constructing 24 inclusionary housing units at the Collins Residential Area site, in comparison to constructing the units at the Project site. This analysis is partially based on information in the Pebble Beach Company EIR, which evaluated 4 market rate units at the Collins Residential Area (Monterey County 2011/2012). As summarized in **Table 5-4**, in comparison with the Proposed Project, impacts at the Collins site would be:

- less for biological resources, and
- similar for other resource topics, with some slightly less and some slightly more.

Overall, impacts would be similar to but greater than those identified for the Project because there would be direct impacts from developing 24 units at the Collins site and potential indirect impacts in Area D, which could be developed with up to 31 units in accordance with existing zoning.

Aesthetics

The aesthetics impacts would be similar to those identified for the Proposed Project.

Like the Project site, this alternative site is not visible along any designated scenic vistas or corridors, including 17-Mile Drive.

The visual character of the site would change from a vacant dirt lot to a residential development with 24 units in 4 buildings, a manager's office, landscaping, and parking. The site is visible from the Collins Field Driving Range to the east and from Portola Road, the Equestrian Center and Special Events Staging area to the north. The site is less visible from Alva Road and existing residences to the west and south because existing mature vegetation along the site perimeter filters and screens these views. Some would perceive this change as an improvement to a vacant dirt lot, and others may prefer a vacant lot to 2-story multifamily structures. This change would not degrade the visual character and quality of the site because the existing and planned landscaping would screen and soften views, and the two-story building height is comparable to the height of surrounding residences. Although the surrounding area to the south and west has large single family homes on large lots, the surrounding area to the north is used for recreation (equestrian center and driving range), so the Project would provide a visual transition from the non-residential land uses to the north and east to the lower density residential uses to the south and west. Overall, this impact is considered similar to the Project because it would not result in substantial degradation, but infill plantings would be required to screen and minimize the change in views from adjacent residences and roadways.

Compared to the Project, the impact of introducing new sources of light and glare from the residences would be similar and slightly less because there is already low level light in the area from existing uses, particularly to the north and east where the equestrian center and driving range are located. Further, the County's Condition of Approval PD014(A) requires exterior lighting be down-lit to control offsite glare.

However, this alternative could expose the new residences to evening light from the driving range to the east once construction is complete. This could be minimized by ensuring the landscape plan includes tall trees and shrubs along the eastern perimeter to screen and filter the light, and the site plan orients the residential structures to minimize exposure to the light (i.e., minimize bedroom windows facing east).

Air Quality

The air quality impacts would be similar to, but slightly less than, those identified for the Project.

Like the Project, there are sensitive receptors adjacent to the site. There are single family residential structures approximately 50 feet to the south and 160 feet to the west. Construction-related emissions include PM10 from grading and construction and diesel TACs from trucks and equipment. Unlike the Project, the alternative site is already graded flat and no tree removal is required, so the intensity and duration of construction activities would be slightly less than the Project. The County's Conditions of Approval require implementation of MBUAPCD rules to reduce construction related

dust and emissions. This alternative would construct a similar development as the Project so the operational emissions would be similar.

Biological Resources

The biological resources impacts would be less than those identified for the Project.

The development footprint is a vacant dirt lot with no vegetation or natural drainage features, and no tree removal would be required. The existing vegetation (tall shrubs) along Alva Road on the western perimeter is within the Parcel B strip outside the development footprint (**Figure 5-4**). The site is surrounded by development and/or roadways on all four sides, except there is a small undeveloped lot with trees (i.e., fragmented forest) across Alva Road to the west. The undeveloped lot is surrounded by roadways and large single family residences and could be part of a residential lot. There is no Monterey pine forest or habitat for special-status plants or wildlife on the development site.

Climate Change

The climate change impacts would be similar to those identified for the Project.

Like the Project, GHGs emitted during construction and from operation could contribute to climate change impacts. Construction would generate emissions from mobile and stationary construction equipment exhaust and employee and haul truck vehicle exhaust. This alternative would have a similar amount of permanent development as the Project. Therefore, vehicle trips and electricity generation and consumption, waste and wastewater generation, and water use would be comparable. As a result, this alternative would generate similar direct and indirect GHG emissions as the Project.

Cultural Resources

The cultural resource impacts would be similar to those identified for the Project.

Subsurface construction activities could damage unknown or previously undiscovered archaeological resources or human remains. This has been disturbed by previous residential development (the site was occupied by two residences that were demolished), but there may not have been substantial subsurface excavation. Therefore, the risk for unknown cultural resources remains similar to the Project. There currently are no structures on the site that could be considered historic or architecturally significant.

Geology, Seismicity, and Soils

The impacts would be similar to those identified for the Project.

There are no identified geotechnical or geologic hazards or constraints that would preclude development at the site (Monterey County 2011/2012). The risk of potential structure damage and associated human safety hazards from groundshaking caused by earthquake would be similar to that of the Project. The soils on this site are Narlon Loamy Fine Sand, 2%-9% slopes which have moderate erosion hazard and high wind hazard. This site is susceptible to wind erosion because it is a flat dirt lot with no vegetation. Overall, impacts related to erosion, loss of topsoil and sedimentation during construction would be similar to the Project and would be reduced by compliance with regulatory requirements. This includes preparing a SWPPP, in accordance with the

state Stormwater NPDES Construction Permit, and implementing BMPs; and complying with the County's Erosion Control Ordinance and Standard Conditions of Approval (e.g., PD007 Grading – Winter Restriction).

Hydrology and Water Quality

The hydrology and water quality impacts would be less than those identified for the Project.

The entire 3.8-acre site, including the 2.6-acre development site for the 24 inclusionary housing units, site is undeveloped with no trees or natural drainage features or waters. It is not within the designated 100-year floodplain or within a designated groundwater basin. Although it is within the Carmel Bay ASBS Watershed, the site has been graded so the entire site drains north towards the Fan Shell Beach watershed, consistent with the plans for the four market rate units which have not yet been built (Monterey County 2011/2012).

The 2.6-acre development site is already graded flat but is currently pervious (unpaved, graded dirt), similar to the Project site (unpaved, ungraded vegetation). The Project would result in 1.5 acres (65,080 sf) of new impervious surface. This alternative includes a similar development footprint as the Project because the buildings would be the same size, but there would be slightly less paved area for roadway/parking because there would be slightly fewer parking spaces (58 instead of 67), and the driveway into the site would be shorter. Therefore, this alternative would result in slightly less impervious area overall.

The residential development would include a drainage plan with a stormwater collection system, including oil/water separator below the parking lot, and a retention basin or closed detention facility. Consistent with the plans for the four market rate units (Monterey County 2011/2012), the storm drain system for 24 inclusionary units would direct run-off to a culvert that crosses Portola Road and discharges into the storm drain system at the equestrian parcel, which drains to the Fan Shell Beach watershed.

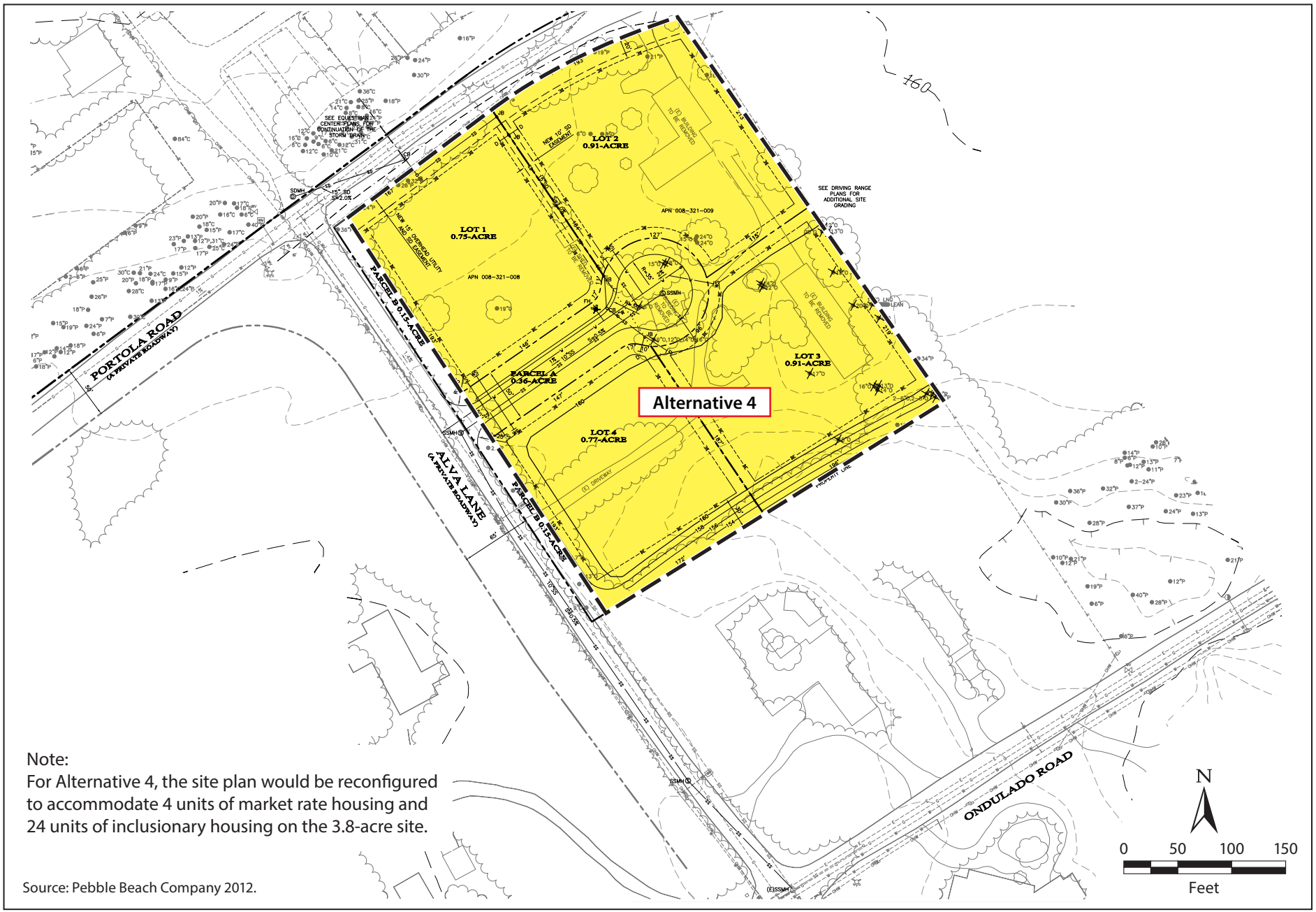
Additionally, there would be less potential to impact regulated waters because there are no waters or drainages on the site.

Land Use and Recreation

The land use and recreation impacts would be similar to, but slightly less than, those identified for the Project.

Similar to the Project, this alternative would be compatible with the surrounding land uses including residential development to the west and south, recreational facilities to the north, and forested open space further to the north. However, this could result in a potentially incompatible land use with the driving range to the east (still in development) because of noise and evening light, which is addressed under Aesthetics. It was determined that noise resulting from the driving range would not exceed the County's standard and significantly impact new or existing residences (Monterey County 2011/2012). Because the site is within the coastal zone and currently designated MDR in the Del Monte Forest LCP (MDR allows up to 4 units/acre), this alternative would require an LCP amendment because current zoning only accommodates 7 units.

Similar to the Project, this alternative would generate approximately 78 new residents who could increase the demand for recreational facilities. Therefore, impacts related to recreational demand



Note:
For Alternative 4, the site plan would be reconfigured to accommodate 4 units of market rate housing and 24 units of inclusionary housing on the 3.8-acre site.

Source: Pebble Beach Company 2012.

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Figure 5-4
Alternative 4, Collins Residential Area

and open space quality and quantity would be similar to the Project. New residents would have access to nearby recreation facilities, including footpaths and connector trails.

Noise and Vibration

The noise and vibration impacts under this alternative would be similar to, but slightly more than, those identified for the Project.

Construction would require the use of heavy equipment which would temporarily increase noise levels at properties near the work site. Noise levels at a given time during construction would be similar to the levels expected under the Project. The closest sensitive receptors to this alternative site are residences located approximately 50 feet to the south, which is similar to the nearest sensitive receptor to the Project site. Mitigation would be similar as prescribed for the Project.

Operation of this alternative would be similar to the Project. However, the existing noise environment near this alternative site is louder than Area D due to the existing surrounding uses and ongoing development associated with the equestrian center, special events staging area, driving range, and Area V, as well as associated traffic on nearby roadways (e.g., Portola Road, Stevenson Drive). As such, introducing additional residential noise would likely be less noticeable to surrounding uses. Therefore, this impact would be similar but slightly less than the Project.

Public Services and Utilities

The public services and utilities impacts would be similar to, but slightly less than, those identified for the Project.

Like the Project, this alternative would generate 78 new residents to the area. Therefore, this alternative would result in similar increased demand for and impacts to public services and utilities as the Project. The potential risks associated with wildland fire hazards would be slightly less because the alternative site is located further from the large open space preservation areas to the northeast, whereas the Project site is adjacent to the HHNHA.

Transportation and Circulation

The transportation and circulation impacts would be similar to, but potentially slightly less than, those identified for the Project. The nearest transit line (MST No. 21) is along Stevenson Drive which is approximately 0.25 mile from the Collins Residence Location, but the Pebble Beach Lodge would only be 0.4 miles thus opening up walking and biking opportunities for any employees working at the Lodge or nearby facilities.

This alternative would result in similar construction-related traffic because it would include similar construction activities as the Project. Haul trucks would use 17-Mile Drive from the Highway 1 Gate (Monterey County 2011), instead of SFB Morse Drive from the SFB Morse Highway 68 Gate.

This alternative would likely generate the same number of daily trips as the Project, but the trips would be distributed to different roadways and intersections. Nearby intersections that were analyzed as part of the Pebble Beach Company Project include Stevenson Drive and Spyglass Hill Road and Forest Lake Road, which were predicted to operate at acceptable conditions (LOS A and B) in 2015 with and without the larger project (Monterey County 2011/2012). However, similar to the Project, this alternative would add trips to intersections and roadways already operating at

unacceptable conditions (refer to Section 3.11 and Monterey County 2011). Overall, this alternative would result in significant and unavoidable impacts, like the Project.

This alternative has better access to public transit in Pebble Beach than the Project because it is 0.25 mile from MST Bus Route 21 (Pebble Beach-Salinas Express), which could transport Pebble Beach employees directly to other portions of Pebble Beach. However, this alternative is further than the Project to other MST bus routes (like MST Route 2).

Water Supply and Demand

The water supply impacts would be similar to those identified for the Project.

This alternative would result in similar demand for potable water, so the overall impact of this alternative would be the same as the Project, including the significant unavoidable impacts related to project water demand in the event of no new regional water supply and related to indirect impacts associated with new regional water supply development.

Potential Combined Impacts of Inclusionary Housing Development at the Collins Residential Area and Area D Buildout

The analysis above described the impacts of development of inclusionary housing units at the Collins Residential location. As noted previously, this alternative would leave the potential for market rate residential development of Area D. In concept, this alternative could result in up to 55 new residential units (24 inclusionary housing units at the Collins Residence location and up to 31 market-rate units at Area D).

The combined impacts of a higher level of buildout than the Proposed Project would result in higher impacts to air quality, GHG emissions, cultural resources, geology, soils and seismicity, hydrology and water quality, land use and recreation, noise and vibration, and public services and utilities, and construction traffic. However, these impacts are likely mitigable to an overall less than significant level like the Proposed Project.

The combined impacts of this alternative on biological resources would be higher than the Project This is because the construction of market-rate units on the Area D site would likely result in higher direct biological impact. However, the Old Capitol site would be dedicated in its entirety as with the Proposed Project since this alternative would include construction of inclusionary housing units.

The combined operational traffic impacts of this alternative would be slightly higher than the Project in relation to traffic impacts on certain failing roadway locations including portions of SR 68 and SR 1 and these significant unavoidable impacts would be higher than with the project.

The combined water supply impacts of the No Project Alternative would be slightly higher than the Project given the higher amount of buildout, but both the inclusionary housing at the Collins Residence location and the market-rate units at Area D could utilize the Applicant's water entitlement.

Alternative 5 – Reduced Density On-Site

Alternative Characteristics

Under this onsite alternative, 24 units of inclusionary housing would be constructed in the 7.7-acre area currently zoned MDR at the Project site, instead of 24 units on the proposed 2.7-acre development footprint (**Figure 5-5**). The assumed gross density would be 3.1 dwelling units per acre, which would be less than the Proposed Project's density of approximately 9 dwelling units per acre (based on 24 units in 2.7 acres). For the purposes of this analysis, it is assumed that the 24 units would be single-story, single-family homes. Refer to **Table 5-3** for a comparison of the development features with the Proposed Project and other build alternatives.

To determine the reduced density for this alternative, the residential densities of the surrounding neighborhoods were considered. As described in Section 3.8, *Land Use and Recreation*, the Del Monte Park residential neighborhood east of the Project site has an approximate gross density of 5 to 7 dwelling units per acre, based on existing conditions for the residential blocks west of Montecito Street. The residential areas in Pebble Beach west of the Project site have lower densities, ranging from approximately 1 to 4 dwelling units per acre. With 24 units on 7.7 acres, the average lot size would be 0.3 acre. Based on an average lot disturbance of 44%[13], this alternative would directly disturb 3.4 acres.

Because it is an onsite alternative, the site is owned by Pebble Beach Company with an entitlement to water service, and existing and surrounding land uses are the same as that described for the Project in Chapter 2, *Project Description*.

Impact Analysis

The impact analysis below focuses on the environmental impacts of constructing 24 units of inclusionary housing on 7.7 acres at the Project site, instead of 24 units on 2.7 acres (two-story, multi-family). As summarized in **Table 5-4**, in comparison with the Project, impacts of this Reduced Density alternative would be similar for all resource topics, with some slightly less and some slightly more.

Overall, impacts would be similar to but greater than those identified for the Project.

Aesthetics

The aesthetics impacts would be different than the Project, but overall would not be significantly better or worse than the Project.

Similar to the Project, this alternative would change the visual character of the site by removing Monterey pine forest and adding housing. This alternative would still intensify the land uses on the site albeit with less dense housing units. The building heights would likely be less than the Project.

[13] This assumption is based on that used in the Pebble Beach Company Project EIR (Monterey County 2011/2012) for the no project alternative. The assumptions used for potential buildout of the 90 lot residential lots, under the no project scenario, was 15,000 sf or 0.34 acre disturbance area per lot. The size of the 90 lots ranged from 0.38 acre to 1.49 acres, with an average lot size of 0.76 acre. Therefore, based on an average lot size of 0.76 acre and an assumed disturbance area of 0.34 acre per lot, the average lot disturbance is roughly 44% of the lot. Therefore, 44% is used to estimate the potential disturbance area per lot for this alternative. With 24 units on 7.7 acres, 44% of 4.5 acres is 3.4 acres.

Compared to the Project, some viewers would perceive the change in visual character as less than that of the Project with the reduction in density.

However, this alternative could result in residences on both side of SFB Morse Drive, and the residences would not be clustered. Thus, some new residences may be closer to existing development both west and east of SFB Morse Drive. In addition, this alternative would require a greater amount of tree removal than the Project, which would leave less visual screening in certain locations.

Additional lighting would be required, but would be more dispersed throughout the 7.7 acre development site. There would be a tradeoff of less intense lighting for more dispersed lighting changes.

The aesthetic impact would depend on individual perceptions. The increased forest removal and the placement of units on both sides of SFB Morse Drive could be perceived by some as a worse aesthetic effect than the proposed Project. On the other hand, the more dispersed single-family residential development character of this alternative might be visually preferred by some individuals to the more intense multi-family visual character of the Proposed Project.

Air Quality

The air quality impacts would be similar to those identified for the Project.

Construction-related emissions include PM10 from grading and construction and diesel TACs from trucks and equipment. This alternative also requires removal of more trees than the Project, so emissions during this phase of construction could be slightly greater. Operation emission would be the same as the Project.

Biological Resources

The biological resources impacts would be greater than those identified for the Project.

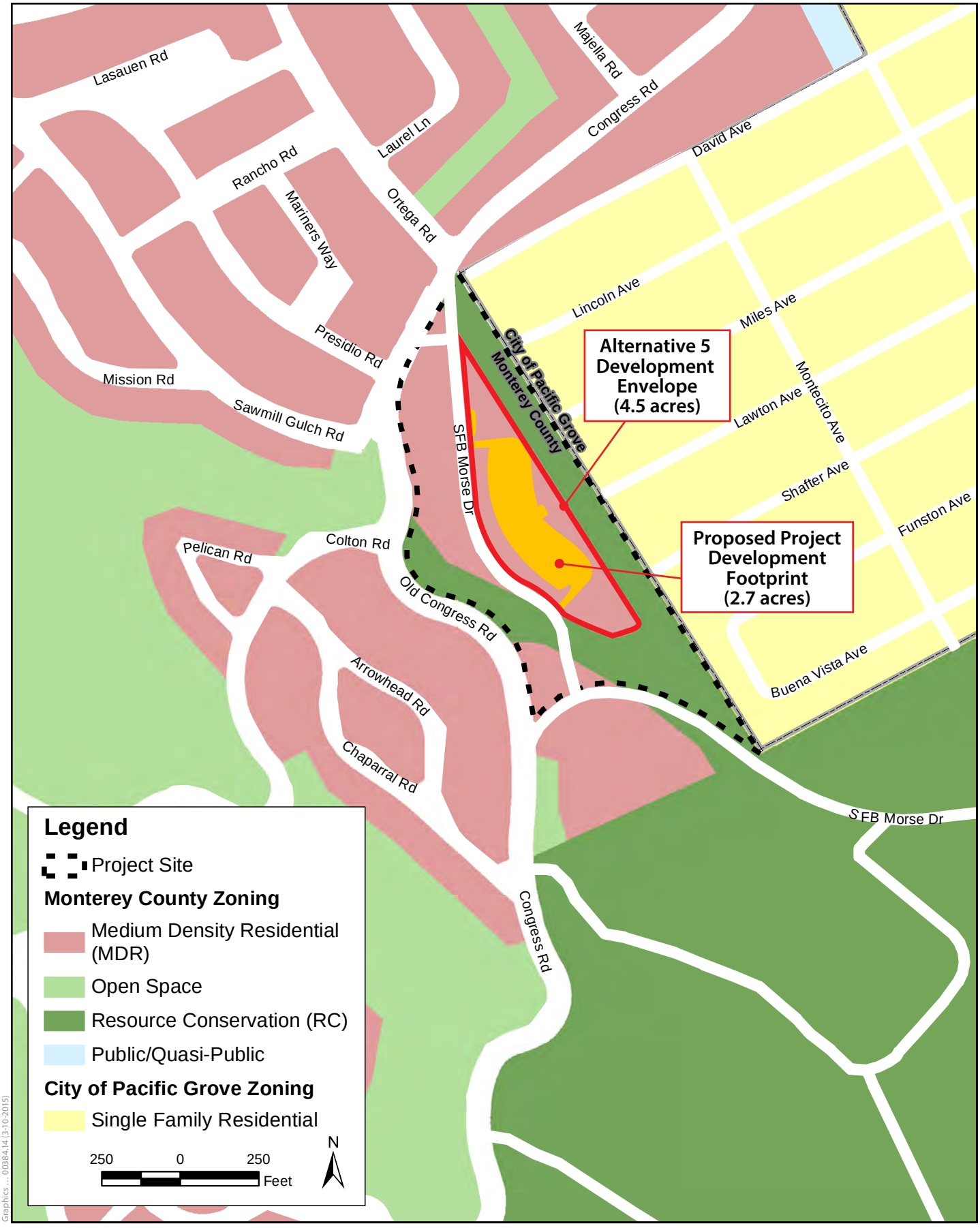
The total development footprint would be larger than the Project's, and, therefore, more Monterey pine forest would be removed. Because more forest would be removed, this alternative would also result in greater impact to habitat for special-status plants or wildlife on the development site.

In addition, due to the more dispersed nature of development, the fragmentation effects of this alternative would also be higher than those of the more clustered development of the Proposed Project meaning that the remnant forest in-between the single homes would have a lower biological value than the less fragmented forest with the Proposed Project.

Climate Change

The climate change impacts would be similar to those identified for the Project.

Like the Project, GHGs emitted during construction and from operation could contribute to climate change impacts. Construction would be similar to the Project but require more tree removal. This alternative would have the same number of housing units as the Project. Therefore, vehicle trips and electricity generation and consumption, waste and wastewater generation, and water use would be slightly less. As a result, this alternative would generate similar direct and indirect GHG emissions as the Project.



Source: Zoning, Monterey County 2014 and City of Pacific Grove 2013; Sidor pers.comm

Figure 5-5
Alternative 5, Reduced Density at Project Site

Cultural Resources

The cultural resource impacts would be similar to, but slightly greater than, those identified for the Project for archaeology and human remains, and similar for historic architecture.

Regarding archaeology, subsurface construction activities could damage unknown or previously undiscovered archaeological resources or human remains. This alternative would include more grading as the development site would be larger. Therefore, it is slightly more likely that unknown cultural resources would be discovered.

Regarding historic architecture, there are no existing buildings on this alternative site. Therefore, impacts related to historic resources would be similar to that of the Project.

Geology, Seismicity, and Soils

The impacts would be similar to, but slightly greater than, those identified for the Project regarding geology, seismicity and soils, and similar for hazardous materials.

For Geology/Seismicity/Soils, this alternative site is the same as Project site, so impacts related to seismic hazards would be similar. Because the development site would be larger than the Project, impacts related to erosion and soil constraints would be similar but slightly greater than those of the Project. Additionally, impacts related to landslides and slope stability would be similar to the Project.

For Hazards/Hazardous Materials, the potential impact would be similar to those identified for the Project.

Hydrology and Water Quality

The hydrology and water quality impacts would be similar to those identified for the Project.

Development of the Project site under this alternative would result in similar alteration of the existing drainage patterns to that of the Project. Implementation of this alternative, similar to the Project, would include construction activities, which would disturb land and result in a temporary increase in sediment loads. All construction activities would be subject to existing regulatory requirements.

The total impervious area under this alternative would be slightly greater than the Project because the development site would be larger due to the less clustered pattern of development. The residential development would include a drainage plan with a stormwater collection system, including oil/water separator below the parking lot, and an aboveground retention basin that releases regulated flow to the existing drainage system.

Land Use and Recreation

The land use and recreation impacts would be similar to, but slightly less than, those identified for the Project.

Similar to the Project, this alternative would be compatible with the surrounding land uses. This alternative would be consistent with the existing zoning and land use designations for the site. However, the single-story single-family homes would be more consistent with the surrounding residential land uses in the Del Monte Park neighborhood in Pacific Grove and the adjacent residential areas in Pebble Beach. This alternative would be less dense than the residential area in

the Del Monte Park neighborhood and the overall height would be less than the two-story single-family residences to the east of the Project site.

Impacts related to recreational demand and open space quality and quantity would be similar to the Project.

Noise and Vibration

The noise and vibration impacts under this alternative would be similar to the Project.

Construction would require the use of heavy equipment which would temporarily increase noise levels at properties near the work site. Noise levels at a given time during construction would be similar to the levels expected under the Project.

Operation of this alternative would be similar to the Project.

Public Services and Utilities

The public services and utilities impacts would be similar to the Project.

Like the Project, this alternative would generate approximately 78 new residents to the area.. Therefore, this alternative would result in similar demand for and impacts to public services and utilities as the Project. The potential risks associated with wildland fire hazards would be similar because the alternative site is located on the same site as the Project.

Transportation and Circulation

The transportation and circulation impacts would be similar to the Project.

This alternative would result in similar construction-related traffic because it would include similar construction activities as the Project.

This alternative would generate the same trips than the Project and the trips would be distributed to the same roadways and intersection. Overall, this alternative would still result in significant and unavoidable impacts, like the Project.

This alternative would have the same access to public transit than the Project.

Water Supply and Demand

The water supply impacts would be similar to the Proposed Project.

This alternative would have a similar water demand as the Project although it might have a slightly higher water demand with single-family development vs. the Project's multi-family development. This alternative would still result in the significant unavoidable impacts related to project water demand in the event of no new regional water supply and related to indirect impacts associated with new regional water supply development.

Alternative 6 – Reduced Units On-Site

Alternative Characteristics

18 Inclusionary Housing Units at the Project Site

Under this onsite alternative, 18 units of inclusionary housing would be constructed on 2.0 acres at the Project site, instead of 24 units on 2.7 acres. There would be three 2-story buildings, each with 6 units (instead of four 2-story buildings, each with 6 units), and a landscaping plan similar to that of the Project. The density would be approximately 9 units per acre, similar to the Project; but with fewer units, a smaller development footprint would be required. Refer to **Table 5-3** for a comparison of the development features with the Proposed Project and other build alternatives.

Because it is an onsite alternative, the site is owned by Pebble Beach Company with an entitlement to water service, and existing and surrounding land uses are the same as that described for the Project in Chapter 2, *Project Description*.

In-Lieu Fee

Additionally, because this alternative only includes 18 inclusionary housing units, an in-lieu fee would be paid to the County instead of developing an additional 7 inclusionary units[14].

Impact Analysis

The impact analysis below focuses on the environmental impacts of constructing 18 units of inclusionary housing on 2 acres at the Project site, instead of 24 units on 2.7 acres. As summarized in **Table 5-4**, in comparison with the Project, impacts of this Reduced Units alternative would be similar for all resource topics, with some slightly less and some slightly more.

Payment of the in-lieu fee for 7 units may result directly or indirectly in construction of inclusionary housing in locations outside Pebble Beach but within the GMPAP. However, given the multiplicity of uses to which in-lieu fees are used by the County to support inclusionary housing, it is speculative to conclude precisely if and where such units might be built. When and where the County proposes inclusionary housing projects, it complies with CEQA at the time such projects are defined and actually proposed.

Overall, impacts would be similar to those identified for the Project, but slightly less on-site impacts due to a smaller development footprint. Regionally, impacts would be similar to the potential build of 24 units, when considering potential development if 7 units elsewhere in the GMPAP.

Aesthetics

The aesthetics impacts would be similar to, but slightly less than, those identified for the Project.

[14] As described in Chapter 1, *Introduction*, under Background, Condition No. 18 of the Pebble Beach Company Project (buildout project) requires construction of 18-25 inclusionary housing units for the approved 90-100 residential lots. Because the proposed project being evaluated in this EIR includes 24 inclusionary units, PBC would pay the County an inclusionary fee for one unit if and when it builds out all 100 lots; and this same assumption applies to Project alternatives with 24 inclusionary units. The Project alternatives with 18 inclusionary units include an in-lieu fee for 7 additional units.

Similar to the Project, this alternative would change the visual character of the site by removing Monterey pine forest and adding housing. This alternative would still intensify the land uses on the site although it would construct fewer housing units and associated parking. The density on the site would be the same as the Project. Because there would be fewer units overall, compared to the Project, some viewers would perceive the change in visual character as less than that of the Project.

Because this alternative would construct fewer housing units on-site, impacts from light and glare would be similar to, but slightly less than, the proposed Project. Therefore, the aesthetic impact on-site could be slightly less than that of the Project.

Air Quality

The air quality impacts would be similar to, but slightly less than, those identified for the Project for on-site impacts.

Construction-related emissions include PM10 from grading and construction and diesel TACs from trucks and equipment. This alternative also requires removal of fewer trees than the Project, so emissions during this phase of construction could be slightly less. Additionally, this alternative would construct fewer housing units, so construction emissions overall would be similar, but slightly less.

Because there would be fewer housing units on-site, operational emission would be slightly less on-site, but regional emissions would be the same as the Project.

Biological Resources

The on-site biological resources impacts would be less than those identified for the Project.

The total development footprint would be smaller than the Project's, and, therefore, fewer Monterey pine forest would be removed. Because less forest would be removed, this alternative would also result in slightly less impact to habitat for special-status plants or wildlife on the development site. Overall impacts would depend on potential impacts of using the in-lieu fee and construction of up to 7 units offsite.

Climate Change

The climate change impacts would be similar to those identified for the Project.

Like the Project, GHGs emitted during construction and from operation could contribute to climate change impacts. This alternative would have less permanent development as the Project on-site but likely similar overall development (24 units) regionally. On-site vs. off-site emissions does not matter for GHG impacts. As a result, this alternative would generate similar direct and indirect GHG emissions as the Project.

Cultural Resources

The cultural resource impacts would be similar to, but slightly less than, those identified for the Project for archaeology and human remains, and similar for historic architecture.

Regarding archaeology, subsurface construction activities could damage unknown or previously undiscovered archaeological resources or human remains. This alternative would include less

grading as the development site would be less. Therefore, it is slightly less likely that unknown cultural resources would be discovered.

Regarding historic architecture, there are no existing buildings on this alternative site. Therefore, impacts related to historic resources would be similar to that of the Project.

Geology, Seismicity, and Soils

The impacts would be similar to, but slightly less on-site than, those identified for the Project regarding geology, seismicity and soils, and similar for hazardous materials.

For Geology/Seismicity/Soils, this alternative site is the same as Project site, so impacts related to seismic hazards would be similar. Because the development site would be smaller than the Project's, impacts related to erosion and soil constraints would be similar to, but slightly less than, those of the Project. Additionally, impacts related to landslides and slope stability would be similar to the Project.

For Hazards/Hazardous Materials, the potential impact would be similar to those identified for the Project. This alternative would include construction of 18 housing units at the same location as the Project, and so hazardous materials impacts related to construction would be similar.

Hydrology and Water Quality

The hydrology and water quality impacts would be similar to those identified for the Project.

Development of the Project site under this alternative would result in similar alteration of the existing drainage patterns to that of the Project. Implementation of this alternative, similar to the Project, would include construction activities, which would disturb land and result in a temporary increase in sediment loads. All construction activities would be subject to existing regulatory requirements. The total impervious area under this alternative would be slightly less than the Proposed Project on-site because the development site would be smaller. The residential development would include a drainage plan with a stormwater collection system, including oil/water separator below the parking lot, and an aboveground retention basin that releases regulated flow to the existing drainage system.

Land Use and Recreation

The land use and recreation impacts would be similar to, but slightly less than, those identified for the Project.

Similar to the Project, this alternative would be compatible with the surrounding land uses. Although this alternative would have fewer units than the Project, it would still be consistent with the existing zoning and land use designations for the site. However, although it would have the same density as the Project, this alternative would be slightly denser than the residential area in the Del Monte Park neighborhood.

This alternative would generate approximately 58 new residents who could increase the demand for recreational facilities. This is fewer new residents than the Project would generate. Therefore, impacts related to on-site recreational demand and open space quality and quantity would be similar to, but slightly less than, the Project.

Noise and Vibration

The noise and vibration impacts under this alternative would be similar to, but slightly less on-site than, those identified for the Project.

Construction would require the use of heavy equipment which would temporarily increase noise levels at properties near the work site. Noise levels at a given time during construction would be similar to the levels expected under the Project.

Operation of this alternative would be similar to the Project. However, this alternative would generate fewer vehicle trips on-site so the associated noise generated by this alternative would be slightly less near the project area, but regional traffic noise would be the same.

Public Services and Utilities

The public services and utilities impacts would be similar to, but slightly less than, those identified for the Project on-site, but regionally would be the same.

This alternative would generate approximately 58 new residents to the area. This is fewer new residents than the Project would generate. Therefore, this alternative would result in similar, but slightly less increased demand for and impacts to public services and utilities as the Project on-site. The potential risks associated with wildland fire hazards would be similar because the alternative site is located on the same site as the Project.

Transportation and Circulation

The transportation and circulation impacts would be similar to those identified for the Project. This alternative would have fewer housing units on-site, and thus less trip generation near the project site. However, regionally, traffic generation would be similar to the Proposed Project with buildout of up to 24 units.

This alternative would result in similar construction-related traffic because it would include similar construction activities as the Project.

Because this alternative would likely have the same regional trip generation as the Project, it is likely that this alternative would still result in significant and unavoidable impacts, like the Project to regional roadways like SR 68 and SR 1.

This alternative would have the same access to public transit than the Project, but fewer pedestrians would be introduced to the expressed safety concern along SFB Morse Drive.

Water Supply and Demand

The water supply impacts would be similar to the Proposed Project.

This alternative would result in similar, though slightly less, on-site demand for potable water. However, combined with off-site water demand for units that may be built with the in-lieu fee, the overall impact of this alternative would be the same as the Project, including the significant unavoidable impacts related to project water demand in the event of no new regional water supply and related to indirect impacts associated with new regional water supply development.

Environmentally Superior Alternative

A key consideration in identifying the environmentally superior alternative is that the alternatives vary in terms of impacts associated with inclusionary housing development, as well as in terms of impacts associated with in-lieu fees, and with the reasonably foreseeable buildout potential for Area D. Thus, this discussion identifies: 1) the environmentally superior alternative when considering only the impacts of constructing inclusionary housing, and 2) the environmentally superior alternative when considering the totality of development and associated impacts that are reasonably foreseeable under each alternative, which includes the combined impact of building inclusionary housing plus other reasonably foreseeable impacts, whether from use of an in-lieu fee or from buildout of Area D consistent with existing zoning.

Inclusionary Housing Only

As presented in the summary comparison of impacts in **Table 5-4a**, all the alternatives evaluated would result in similar impacts as the Project for inclusionary housing development for most resource topics, although the specific locational impacts may vary.

While Alternative 1 (No Project) would not result in construction of inclusionary housing units at Area D, the location of potential inclusionary housing units constructed with an in-lieu fee is unknown, and thus no conclusion can be made in regard to biological resource impacts. As a result, Alternative 1 cannot be determined to be the environmentally superior alternative.

When considering only the inclusionary housing development, Alternatives 2 (Sunset Drive/17-mile Drive), 3 (Corporation Yard), and 4 (Collins Residential Area) would all result in substantially lower impacts to biological resources than the Project since they would construct inclusionary housing units on locations that are previously disturbed. Alternative 5 (Reduced Density On-site) would result in greater biological resource impacts than the Project. Alternative 6 (Reduced Units On-Site) would result in less impact at Area D than the Project, but more than the inclusionary housing aspects of Alternatives 2, 3, and 4. Thus, Alternatives 5 and 6 would not be the environmentally superior alternative when considering only the inclusionary housing development.

Alternative 3 would result in more impacts to geology and soils than Alternatives 2 and 4 due to the unconsolidated fill requiring substantial excavation, which also increases impacts related to construction air quality and traffic. Alternative 3 would also include more residents adjacent to the HHNHA, resulting in higher indirect impacts to biological resources. Alternative 3 would also be more distant to areas of employment, services, and transit than Alternatives 2 and 4. Thus, Alternative 3 would not be the environmentally superior alternative when considering only the inclusionary housing development.

Alternatives 2 and 4 would result in similar impacts for most resource topics. Alternative 2 would result in greater impacts related to hazardous materials because there is an open leaking underground storage tank clean-up site and demolition of buildings which could contain hazardous materials such as asbestos or lead. However, hazardous materials impacts could be controlled through site cleanup to avoid residual impacts during and after construction. Alternative 2 has better transit connections, is close to the Inn at Spanish Bay where some PBC employees might work, and is closer to services and schools outside Pebble Beach. Neither alternative would be perfectly consistent with surrounding land uses, as Alternative 2 would be adjacent to

commercial/light industrial uses and Alternative 4 would result in a somewhat higher density of residential use than surrounding large lot development.

In summary, Alternatives 2 (Sunset Drive/17-Mile Drive) and 4 (Collins Residential Area) would result in similar overall environmental impacts, especially since both sites are previously fully disturbed, and both could be considered the environmentally superior alternative. If one were to choose, Alternative 2 would be less compatible with adjacent commercial/light industrial land uses, compared to the general compatibility of residential use adjacent to Alternative 4. In addition, Alternative 2 would require more substantial construction due to the removal of residual contamination. Therefore, **Alternative 4 (Collins Residential Area)** is considered the Environmentally Superior Alternative, when considering only the inclusionary housing.

Inclusionary Housing, In-Lieu Fees, and/or Area D Buildout Combined

As presented in the summary comparison of impacts in **Table 5-4b**, Alternatives 1-4 would result in greater impacts overall than the Project and Alternatives 5 and 6 for air quality, biological resources, GHG emissions, regional traffic, and water supply because they could result in construction of up to 24 units of inclusionary housing, plus up to 31 market rate units at Area D.

Alternatives 5 (Reduced Density On-Site) and 6 (Reduced Units On-Site) would both result in 24 inclusionary housing units overall, although Alternative 6 would result in only 18 units on-site. Regionally, Alternatives 5 and 6 would have similar impacts as the Project and compared to each other. On-site, Alternative 6 would result in fewer impacts than the Project and Alternative 5, because it would have a smaller development footprint and smaller associated impacts on biological resources and other resource areas. The site-specific impacts associated with an in-lieu fee for 7 units with Alternative 6 are unknown; thus, it is difficult to make a definitive conclusion as to whether the overall environmental impacts of Alternative 6 would be less than Alternative 5. Nevertheless, given the possibility that the in-lieu fee may not result directly in housing construction and/or that construction of the 7 units would be constructed in an area that was previously developed or containing less biological resources than the project, **Alternative 6 (Reduced Units On-Site)** is considered the Environmentally Superior Alternative, when considering the combination of inclusionary housing, in-lieu fee, and/or Area D buildout.