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5. ALTERNATIVES TO THE PROPOSED PROJECT

CEQA requires a description of a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. Also required is an evaluation of the comparative merits of the alternatives (Title 14 CCR §15126.6(a)). An EIR is not required to consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. CEQA requires that the discussion of alternatives focus on those alternatives capable of eliminating, avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly (Title 14 CCR §15126.6(b)).

Alternatives are compared to the proposed project on a relative basis. For example, where both the proposed project and an alternative would have a less than significant effect, one of the two might still have relatively less impact, and be relatively superior to the other. Alternatives are compared to the project as proposed in project plans. Following the description and discussion of each alternative, the merits of the alternatives are compared and ranked.

5.1 DEVELOPMENT OF PROJECT ALTERNATIVES

Alternatives developed during the environmental review process have been evaluated and screened so that only a reasonable range of alternatives are carried forward for detailed analysis. Those alternatives determined to be unreasonable are eliminated from further consideration. The following sections discuss the alternative development and screening process and identify those alternatives that would fulfill the purpose of and the need for the proposed project that are selected for further consideration in this document.

5.1.1 Relationship to Project Objectives

In accordance with CEQA Section 15124(b), a statement of objectives sought by the proposed project should be clearly stated to aid the Lead Agency in developing a reasonable range of alternatives to evaluate in the EIR. These objectives are also utilized to aid decision makers in preparation of findings or statement of overriding considerations (Title 14 CCR § 15124 (b)). The following objectives outline the underlying purpose of the proposed project and will be used to evaluate each of the alternatives to the proposed project:

- Redevelop the existing vacant Paraiso Springs Resort into a world-class destination spa/resort hotel;
- Build a project that is consistent with the objectives and policies of the *Central* Salinas Valley Area Plan and the 1982 Monterey County General Plan;
- Develop a mission style resort that provides visitor-serving support for the Monterey County wine corridor honoring the historic connection to the Soledad Mission's use of the property as a vineyard and retreat;
- Proactively engage the services of local businesses in the construction and on-going operation of the resort;

- Work with Monterey County, local wineries, and other related businesses to promote the Monterey wine corridor as a destination for tourism;
- Provide a therapeutic environment for wellness treatment and education;
- Utilize the existing mineral hot springs and sweeping views of the Central Salinas Valley as key amenity features;
- Provide services and amenities for both overnight and day guests;
- Provide an economically sustainable combination of hotel units and timeshare units of varying sizes;
- Create long-term employment and economic (tax revenue) opportunities for Monterey County;
- Provide an onsite interpretive display of the history and historic events associated with the Paraiso Springs Resort;
- Provide measures to fully offset greenhouse gas emissions generated by the project;
- Develop and provide opportunities to reduce greenhouse gas emissions through the provision of a shuttle service for employees and guests, and on-site programs such as the use of electric service vehicles, solar energy generation, energy efficient building design, use of Energy Star appliances and fixtures, etc. to the extent feasible;
- Retain a minimum of 150 acres of the project site as natural open space that would accommodate hiking trails and landscaping, and preserve the existing habitat and natural landforms;
- While Monterey County shares many of the same objectives as the applicant, the County has identified two additional objectives:
- Provide visitor serving amenities identified in the Agricultural and Winery Corridor program from the 2010 *Monterey County General Plan*; and
- Maximize development of this previously disturbed site to reduce pressure to convert agricultural land to visitor supporting uses related to the Agricultural and Winery Corridor, which is identified as an economic program in the 2010 *Monterey County General Plan*.

5.1.2 Alternatives Screening Process

Consistent and standardized criteria for establishing the reasonableness or feasibility of certain alternatives are typically applied. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives (Title 14 CCR §15126.6(f) (1)). Among the factors that may be used to eliminate alternatives from detailed consideration include: (1) failure to meet most of the basic project objectives; (2) infeasibility; or (3) inability to avoid significant environmental impacts.

5.1.3 Alternatives Eliminated from Detailed Analysis

An "Alternative Site Location" was rejected because the *Monterey County General Plan*, *Central Salinas Valley Area Plan*, and Zoning Ordinance all contemplate a visitor serving use at this location, the historic use of the site has been for visitor serving purposes, and the applicant specifically purchased and seeks to develop this property because of the attraction of the hot springs. An alternative location would not meet the basic project objectives of utilizing the mineral hot springs, developing a mission style resort that provides visitor-serving support for the Monterey County wine corridor, honoring the historic connection to the Soledad Mission's use of the property as a vineyard and retreat, or reducing pressure to convert agricultural land. There are no other locations within the Central Salinas Valley that includes natural mineral hot springs or that includes the historic use by the Soledad Mission. The site does not currently contain agricultural uses. For all these reasons, the "Alternative Site Location" was eliminated from consideration.

A hotel only alternative was eliminated as not being economically feasible, and not being consistent with a sufficient number of project objectives. The timeshare units are important to provide adequate financing and occupancy rates to make the project financially feasible due to the need to construct on-site and off-site infrastructure for the project, such as a sewer system, water system, fire suppression system, and off-site road improvements. Timeshare units have a higher average occupancy rate (personal communication, John Thompson, September 7, 2017), which help to make the project economically feasible, as well as meet county goals related to obtaining tax revenue from the project site to support agricultural and tourism related programs funded by the county. Most importantly from the lead agency's standpoint, such an alternative would also not meet a fundamental project objective, important to and included by the county, relating to maximizing the use of the site to reduce pressure to convert other agricultural land in the wine corridor as well as meet the needs of the wine corridor economic program outlined in the 2010 *Monterey County General Plan*.

5.1.4 Alternatives Selected for Detailed Analysis

Below is a qualitative analysis of a reasonable range of alternatives to the proposed project. This analysis is intended to provide a relative comparison between the proposed project and each individual project alternative. In several cases, the description of the impact level may be the same under each scenario when compared to the CEQA thresholds of significance (i.e., both scenarios would result in a less than significant impact determination). However, the actual degree of impact may be slightly different under each scenario, and this relative difference is the basis for a conclusion of greater or lesser impacts.

While none of these alternatives can reduce the only Significant and Unavoidable impact to historical resources, each one reduces impacts in comparison to the proposed project. Each of the alternatives analyzed in section 5.2 consists of a reduced project size, which generally results in less impact for many of the resource topics.

This analysis will identify an environmentally superior alternative from among the alternatives. The environmentally superior alternative is the alternative that would result in the fewest or least significant environmental impacts, while still achieving the basic

objectives of the proposed project, as described during the planning effort. The alternatives discussed below are deemed as potentially feasible for analysis in this EIR; however, a final decision on feasibility of each alternative will be determined through evidence provided to the County decision-making body.

The alternatives evaluated include the following:

Alternative #1 - No Project Alternative Alternative #2 – Valley Floor Alternative One Alternative #3 – Valley Floor Alternative Two Alternative #4 - Reduced Project Alternative - Phases 1 and 2 Project

The analysis of each alternative as compared to the proposed project is presented below.

According to the California Environmental Quality Act, section 15126.6(f), "...the alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project." As described below, there is no way to avoid the significant effects related to this project. Cultural Resources impacts, related to the previous demolition of historic structures, cannot be avoided or reduced through these project alternatives, including the No Project Alternative and are determined to be significant and unavoidable. Mitigation measures identified for all topic areas, which measures reduce impacts to less than significant, with the exception of impacts to cultural resources, would also be applied to the alternatives described below, other than the No Project Alternative.

5.2 ANALYSIS OF PROJECT ALTERNATIVES

Analysis of the alternatives assumes that all applicable mitigation measures associated with the proposed project would be implemented with the alternatives, as appropriate. Nevertheless, applicable mitigation measures may be scaled to reduce or avoid potential impacts associated with the alternative under consideration and may not precisely match those identified for the proposed project.

5.2.1 Alternative #1: No Project Alternative

CEQA stipulates that a "no project" alternative be evaluated along with its impacts. The "no project" alternative is the circumstance under which the project does not proceed. The "no project" alternative analysis must discuss the existing conditions, 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 and community services (Title 14 CCR §15126.6(e)). If disapproval would result in predictable actions by others, such as the proposal of some other project, the "no project" consequence should be discussed. In certain instances, the No Project Alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the proposed project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval. It should not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

This RDEIR describes the current environmental conditions at the project site. Under the "no project" alternative, the project site would remain unchanged, and no new development would occur. In general, the project site would continue to show the evidence of the past, with a few buildings that served the prior resort, including but not limited to the fifteen vernacular cabins, a changing room, a recreation room, indoor and outdoor baths, six mobile homes, a lodge, a workshop, a yurt compound, and several small outbuildings. There would be no impacts to oak woodlands or other habitats. However, the "no project" alternative would not eliminate the potential for the site to be developed, because existing land use and zoning designations allow visitor-serving and agricultural uses at this location.

While the portions of the property not zoned for Visitor Serving/Professional Office could be converted to agricultural use, the analysis below does not consider that possibility, as those areas tend to be on the steeper portions of the property. If the zoning were changed on the valley areas of the property, from Visitor Serving/Professional Office portion to a district that allows agricultural uses, many of the impacts of this No Project Alternative would be greater that the proposed project. To conduct agricultural uses on those areas would likely require discretionary actions subject to further environmental review.

Impact Analysis

<u>Aesthetics</u>

No changes to the aesthetic quality or visual character of the project site would occur under the No Project Alternative. Under this alternative, no new structures would be built at the project site. This would avoid removal of as many as 191 trees and other vegetation, in addition to preventing changes in topography within the project site from grading activities. In addition, under this alternative, no new sources of light and glare would be introduced at the project site. Although development of the project site is not expected to substantially degrade the existing visual quality or character of the project site or surrounding area; and although these impacts were found to be less than significant as described in Section 3.1, Aesthetics and Visual Resources, this alternative would eliminate impacts on aesthetics in comparison to the impacts of the proposed project.

Air Quality

Air quality impacts are primarily associated with vehicle emissions. Short-term air quality impacts are associated with construction activities (e.g., earthmoving vehicles) in comparison to the long-term impacts of guest and visitor traffic and stationary source emissions. No new short-term construction or long-term operational air quality emissions would occur with implementation of the No Project Alternative. As identified in Section 3.2, Air Quality, impacts resulting from implementation of the proposed project can be mitigated to less than significant. Under the No Project Alternative, the project site would remain in its existing condition and would not experience an increase in short-term or long-term air quality emissions. Therefore, this alternative would eliminate impacts on air quality in relation to the impacts of the proposed project.

Biological Resources

The project site would remain in its current condition under the No Project Alternative. Existing plant and wildlife habitats would remain and removal of oak trees and riparian vegetation would not occur under this alternative. As identified in Section 3.3, Biological Resources, biological resource impacts resulting from implementation of the proposed project can be mitigated to less than significant. However, because the No Project Alternative would result in no impact to biological resources, this alternative would eliminate impacts on biological resources compared to the impacts of the proposed project.

Climate Change

Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities, site operations that utilize electricity or use fuel, and transportation emissions (direct or indirect). With no change in use from the existing setting, no contribution to climate change would occur under the No Project Alternative. Because the proposed project is proposing no net contribution to climate change as part of the project description, this alternative would have the same impacts as the proposed project.

Cultural Resources

The project site would remain in its current condition; no ground-disturbing activities would occur under the No Project Alternative. As such, there would be a significant reduction in the potential for the disturbance or destruction of additional historical resources, unique archaeological resources, or paleontological resources. However, as identified in Section 3.5, Cultural Resources, impacts to historic resources cannot be mitigated to a less than significant level due to the previous removal of the nine individually significant Victorian-era cottages in 2003. The project applicant would still be required to obtain an "after the fact" demolition permit and address the illegal removal of these cottages. This may include measures similar to those identified in MM 3.5-1a through MM 3.5-1d, which includes, but is not limited to preparing a cohesive theme for all site-related displays, providing a digital catalog of historic archives of the project site; preparing a printable digital brochure of the site's history; providing a grant of up to \$10,000 to assist with the cataloging, displaying and archiving of the resources; and design and creation of a digital historic display that describes the history of the project site that can be used in various locations in the Central Salinas Valley area. Under the No Project Alternative, as these historic resources cannot be recreated, this would be considered a significant and unavoidable impact and would result in greater impact in comparison to the proposed project due to the lack of the ability to implement the mitigation measures summarized above as only a ministerial permit may be required to obtain the "after-the-fact" demolition permit.

For other potential cultural resource impacts related to Native American and unique archaeological resources, impacts under the No Project Alternative would be eliminated in comparison to the impacts of the proposed project.

Geology and Soils

The project site is subject to earthquakes and seismic ground shaking. In addition, the project site may be subject to secondary seismic effects such as liquefaction and landslides. As identified in Section 3.6, Geology and Soils, impacts resulting from implementation of the proposed project can be mitigated to less than significant. The No Project Alternative would not result in the development of new structures within a seismically active area that is susceptible to secondary seismic effects, and there would be no potential for short-term construction-related erosion. Therefore, no impacts would occur under this alternative.

However, with the no project alternative, the site will retain old buildings that were not built to current geologic stability standards, which could cause them to fail in a major earthquake and thus structural damage could be greater than the proposed project.

Hazards and Hazardous Materials

Under the No Project Alternative, the project site would remain undeveloped. In the short-term, the No Project Alternative would not require earthmoving activities that could result in accidental spills or release of hazardous construction-related materials. However, structures located within the project site, which contain asbestos and lead would not be removed under this alternative. As identified in Section 3.7, Hazards and Hazardous Materials, the hazardous impacts would be considered less than significant. However, because the No Project Alternative would not result in additional hazardous materials use at the project site, this alternative would have no impacts associated with hazards and hazardous materials in comparison to the impacts of the proposed project.

Hydrology and Water Quality

Short-term Erosion and Water Quality

The proposed project would result in short-term erosion and water quality impacts that would be less than significant with mitigation measures. Under the No Project Alternative, the project site would remain undeveloped. In the short-term, the No Project Alternative would not require earthmoving activities that would result in increased erosion and sedimentation. Therefore, this alternative would have no short-term erosion and water quality impacts.

Long-term Surface Water Runoff

The proposed project would result in long-term surface water runoff impacts that would be less than significant with mitigation measures. Under the No Project Alternative, the project site would remain undeveloped. In the long-term, the No Project Alternative would not alter the existing drainage pattern and increase the amount of impervious surfaces on approximately 23 acres of land, as would the proposed project. Therefore, this alternative would have no long-term surface water runoff impacts.

Long-term Surface Water Quality

The proposed project would result in long-term surface water quality impacts that would be less than significant with mitigation measures. Under the No Project Alternative, the project site would remain undeveloped. In the long-term, the No Project Alternative would not result in long-term surface runoff that may contain urban contaminants that have an adverse impact on surface water quality. Therefore, this alternative would have no long-term surface water quality impacts.

Long-term Water Supply

The proposed project would result in a less than significant impact to the Salinas Valley Groundwater Basin. Net groundwater use for proposed project would result in a reduction of 15.5 acre-feet per year flowing from the site to the groundwater basin, or 17.8 acre-feet per year if supplemental watering for wetland/riparian areas is required. Groundwater levels in the Forebay Aquifer and the groundwater basin would not be substantially affected by the required water withdrawals: therefore, the impact is considered less than significant.

Under the No Project Alternative, the project site would remain undeveloped. In the longterm, the No Project Alternative would not result in a reduction of groundwater in the basin. Therefore, this alternative would have no long-term water supply impacts.

Effect on Salinas Valley Groundwater Levels

Implementation of the proposed project would result in a net reduction in groundwater flowing from the aquifer underlying the site by between 15.5 and 17.8 acre-feet per year. This would result in a lowering of the water table of up to 0.02 inches in the aquifer between the project site and the Salinas River, eight miles to the north and east. The project's net consumptive use on the Salinas Valley Groundwater Basin is a reduction of 0.002 percent of average annual recharge. This is considered a less than significant impact.

Under the No Project Alternative, the project site would remain undeveloped. The No Project Alternative would not result in a reduction of groundwater levels in the basin. Therefore, this alternative would have no effect on the groundwater basin levels.

Well Interference

Implementation of the proposed project would lower water levels in nearby wells. Calculations show that water levels would be reduced by up to 0.5 feet in the closest well, which could affect that well's pumping rate by 0.27 percent. The lowering of the water level and pumping rate would not affect the well capacity or amount of water provided by that well. Effects on wells at greater distances would be less than 0.5 feet lowering of the water table, decreasing to no measurable effect farther from the project site. Therefore, this is considered a less than significant impact.

Under the No Project Alternative, the project site would remain undeveloped. The No Project Alternative would have no effect on nearby wells.

Potential Spring Impact

Implementation of the proposed project would lower water levels in the water table, which could affect flow from the spring that supplies water to neighboring property. The construction of an underground storage tank for treated wastewater could interrupt the flow of water to the spring. However, the project description includes a proposal to ensure the tank is constructed on a base that allows aquifer transmissivity. Therefore, the impact is considered less than significant.

Under the No Project Alternative, the project site would remain undeveloped. The No Project Alternative would have no effect on the onsite spring.

Groundwater Quality

The proposed project would use treated wastewater for irrigation. Evaporative concentration of irrigation water, and evaporation from the ornamental pond could increase total dissolved solids (TDS) in the groundwater; the use of certain types of water softening equipment could increase calcium carbonate levels in groundwater to a level that could exceed drinking water standards. Resort operations could affect water quality by increasing salinity. This impact would be less than significant with implementation of mitigation measures.

Under the No Project Alternative, the project site would remain undeveloped. The No Project Alternative would not result in potential groundwater quality impacts. Therefore, this alternative would have no effect on groundwater quality.

Wetland and Riparian Habitat Impact

The proposed project could lower the water table to a level that could adversely impact wetland or riparian vegetation. This impact would be less than significant with implementation of mitigation measures.

Under the No Project Alternative, the project site would remain undeveloped. The No Project Alternative would not result in potential adverse impacts to wetland and riparian habitat. Therefore, this alternative would have no effect on wetland and riparian habitat.

<u>Noise</u>

Development activities create short-term noise impacts from the operation of construction equipment and long-term noise impacts from increased vehicle traffic and resort operations. Under the No Project Alternative, the project site would remain in its current condition. No noise from short-term construction or from long-term operational activities would occur; therefore, no noise impacts would result from this alternative. By implementing the mitigation measures for the project set forth in Section 3.10, Noise, all impacts from short-term noise would be considered less than significant. However, because this alternative would not result in development that would create increased traffic-related or other noise sources, the No Project Alternative would have fewer noise impacts in comparison to the impacts of the proposed project.

Public Services and Utilities

Wastewater Generation and Treatment

As discussed in Section 3.11, Public Services and Utilities, implementation of the proposed project would result in increased wastewater flows and includes construction of new wastewater treatment, distribution, and disposal facilities. The construction and operation of these facilities would result in a less than significant environmental impact. The No Project Alternative would not generate wastewater and therefore, avoids the impact.

Water Quality

The water supply for the proposed project currently exceeds the public health standard of 2.0 mg/L for fluoride. As discussed in Section 3.11, Public Services and Utilities, a mitigation measure is required to address water quality issues. The No Project Alternative would not require the use of water. Therefore, the No Project Alternative would avoid this impact.

Storm Drainage Facilities

The proposed project would be required to detain the difference between the 100-year post-development storm runoff rate and the 10-year pre-development storm runoff rate. This may require the construction of new or expanded storm water detention facilities. As discussed in Section 3.11, Public Services and Utilities, the associated impacts are less than significant with mitigation measures. The No Project Alternative would not require construction of storm drainage facilities and therefore, the impact would be avoided.

Solid Waste

The proposed project would result in construction and long-term solid waste. As discussed in Section 3.11, Public Services and Utilities, the associated impacts were determined to be less than significant. The No Project Alternative would not generate solid waste and therefore, the impact would be avoided.

Transportation and Traffic

No new buildings would be developed and, therefore, no additional vehicular trips would be generated under the No Project Alternative. The additional trips generated under the proposed project would contribute to additional traffic on Paraiso Springs Road, Clark Road, or River Road, although this was found to be a less than significant impact with the project. However, since the No Project Alternative would not result in constructionrelated vehicle trips or add long-term operational traffic to the road network, this alternative would result in fewer impacts in comparison to the impacts of the proposed project.

Conclusion

The No Project Alternative would result in fewer impacts in comparison to the proposed project impacts, with the exception of Cultural Resources, where the level of impact would be greater due to lack of ability to mitigate for historic structures already removed, and with the exception of Climate Change, which would have no impact, the same as the proposed project. The No Project Alternative would not meet all the project objectives because it would not develop a resort that provides visitor-serving support for the Monterey County wine corridor honoring the historic connection to the Soledad Mission's use of the property as a vineyard and retreat, provide an economically sustainable combination of hotel units and timeshare units of varying sizes, maximize development of this previously disturbed site, reduce pressure on the conversion of other agricultural areas to provide tourist accommodations related to the Winery Corridor, and provide a world class spa-resort in the Central Salinas Valley.

Adoption of the No Project Alternative may lead to development of other sites to accommodate visitor-serving needs of the Winery Corridor, although the level of development and location of such development is too speculative to determine here. For example, some of the development could occur in cities and some could occur in the unincorporated area. Some impacts, such as hydrology, biology, climate change and traffic, could be similar or greater if other development proposals meet visitor-serving needs of the Salinas Valley and the Winery Corridor. The reason that greater impacts could occur are due to this site's opportunities to retain and percolate drainage water, redevelop an old resort area, potentially reduce biological and agricultural land conversion effects, and the potential that another development may not fully offset their contribution to climate change and may not utilize shuttle buses to the extent proposed for this project.

5.2.2 Alternative #2: Valley Floor Alternative One

This valley floor alternative would eliminate the majority of proposed development on slopes exceeding 30 percent. The objective of this alternative is to create better consistency with County policy related to development on slopes exceeding 30 percent, minimize retaining walls, and reduce the visibility of development on the site from surrounding areas. This alternative would involve the following modifications to the site plan:

- 1. Redesign and/or relocate the parking area for the hamlet;
- 2. Relocate the timeshare condominium units on lots 21 and 22 from their current location along a hillside in an area that requires encroachment onto 30 percent slopes to Indian Valley in the location of the villa lots. This alternative would remove the timeshare villa lots and relocate the timeshare condominium units to that area; and
- 3. Remove the access road to the timeshare condominiums in lot 23. This proposed access road is along a very steep hillside. The timeshare condominiums on Lot 23 could be provided access along the path of the existing service road.

The result of these changes would be the retention and relocation of the 60 timeshare condominium units but the elimination of the 17 timeshare villa lots. This results in almost a 10 percent reduction in visitor serving units being constructed on site (from 180 to 163). Elimination of these units results in a drop in the number of rooms from 310 to 251 (19%). The outcome would be removal of development at higher and more visible locations, a reduction in grading and development activities on steeper slopes, and the potential removal of some retaining walls.

Impact Analysis

<u>Aesthetics</u>

The smaller footprint under Valley Floor Alternative One would result in fewer visual changes to the project site. Fewer structures would be built; therefore, fewer trees and other vegetation would be removed, and fewer sources of light and glare would be introduced within the project site. As stated in Section 3.1, Aesthetics and Visual Resources, planting of trees will occur in accordance with Section 21.64.260 of the Monterey County Code. In addition, Valley Floor Alternative One would avoid slopes

greater than 30 percent particularly on lot #23. Under the proposed project, the condominiums on lots #21 and #22 would be visible from Paraiso Springs Road. Relocation of these proposed units from this hillside would retain the existing visual character of the site when viewed from off site. These lots would then remain as undeveloped open space and would be dedicated for scenic enjoyment for the remainder of the project site and those viewing the site from a distance. Implementation of the proposed project is not expected to substantially degrade the existing visual quality or character of the project site or surrounding area, and all impacts herein were found to be less than significant with mitigation measures as outlined in Section 3.1, Aesthetics and Visual Resources. However, Valley Floor Alternative One would have fewer impacts on aesthetics, light, and glare than the proposed project with a reduction in development and vegetation removal, and an emphasis on keeping development at lower elevations.

Air Quality

Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities. Therefore, slightly less particulate matter from short-term construction would occur under Valley Floor Alternative One. In addition, the reduction of the number of units developed would correspondingly reduce construction exhaust emissions associated with construction activities. The elimination of timeshare units would reduce vehicular trips and long-term vehicular emissions generated by development within the project site. As such, fewer impacts to air quality would occur. With implementation of mitigation measures, as outlined in Section 3.2, Air Quality, impacts regarding air quality were found to be less than significant. However, this alternative would have fewer impacts on air quality relative to the proposed project due to less grading, resulting in less construction vehicle exhaust emissions and less dust generated, and slightly lower operational emissions related to vehicle exhaust and emissions from energy use. Although this alternative would result in slightly fewer air quality impacts, the air quality impacts associated with the proposed project would not be substantially lessened with implementation of this alternative.

Biological Resources

Valley Floor Alternative One would result in fewer timeshare units and, subsequently, additional open space. As such, there would be fewer disturbances to existing plant and wildlife habitats, including the removal of oak woodland habitat and other vegetation. Also, as this alternative would have fewer impacts to wildlife habitat, the potential impacts to special-status wildlife species would also be reduced. This alternative would not, however, result in a reduction of wetland impacts when compared with the proposed project.

As identified in Section 3.3, Biological Resources, biological resource impacts resulting from implementation of the proposed project can be mitigated to a less than significant level. However, because this alternative would result in less removal or disturbance of biological resources, this alternative would have fewer impacts on biological resources in comparison to the impacts of the proposed project. Therefore, with the exception of potential impacts to wetlands, this alternative would lessen the biological impacts associated with the proposed project.

Climate Change

Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities, site operations that utilize electricity or use fuel, and transportation emissions (direct or indirect). Less particulate matter from short-term construction would occur under this reduced project alternative. The reduction of the number of units developed, and locating development on gentler slopes, would reduce grading activities, which will reduce construction exhaust emissions associated with construction activities. The elimination of a few timeshare units would reduce vehicular trips and long-term vehicular emissions generated by development within the project site. The proposed project includes a provision to design the project such that no net increase in contributions to climate change will occur, as discussed in Section 3.4, Climate Change. This alternative analysis assumes that a reduction of less than 10 percent of the units will still allow no net increase in contributions to climate change in contributions to climate change in contributions to climate constructions to climate change in contributions to the impacts of the proposed project.

Cultural Resources

The impacts to archaeological resources through construction of the proposed project were found to be less than significant with mitigation. However, as identified in Section 3.5, Cultural Resources, impacts to historic resources resulting from implementation of the proposed project cannot be mitigated to a less than significant level due to previous removal of the nine individually significant Victorian-era cottages in 2003.

Valley Floor Alternative One would result in fewer timeshare units and additional open space. As such, there would be a slight reduction in the potential for the disturbance or destruction of unique archaeological resources or paleontological resources. The project applicant would still be required to implement mitigation measures incorporated herein to reduce the impacts to historic resources to the extent feasible. Even with implementation of these mitigation measures, as these historic resources cannot be recreated, this would continue to be a significant and unavoidable impact under Valley Floor Alternative One and would result in no change in comparison to the proposed project.

For other potential cultural resource impacts related to Native American and unique archaeological resources, impacts under the Valley Floor Alternative One would result in less potential impact in comparison to the impacts of the proposed project.

Geology and Soils

The project site is subject to earthquakes and seismic ground shaking. In addition, the project site may be subject to secondary seismic effects such as liquefaction and landslides. Valley Floor Alternative One would result in a smaller construction footprint and fewer timeshare units in comparison to the proposed project. The reduction in timeshare units would reduce exposure of persons and structures to seismic hazards. There would be a lower potential for short-term, construction related erosion to occur and, therefore, would have a lower potential to create adverse impacts. In addition, the additional open space would result in the permanent preservation of many of the steep slopes on the project site. This would reduce potential adverse impacts from long-term erosion hazards and landsliding. Therefore, fewer impacts could occur under this

alternative. As identified in Section 3.6, Geology and Soils, with the incorporation of the recommended mitigation measures, the proposed project will have a less than significant effect on geology and soils. However, Valley Floor Alternative One would result in fewer buildings at the project site. As such, because there would be fewer units within a seismic hazard area and less potential for short- and long-term erosion, this alternative is viewed as having less impact associated with seismic hazards in comparison to the impacts of the proposed project.

This alternative does, however, eliminate some development on hillsides and, therefore, the hazards associated with potential landslides are lessened when compared with the impacts of the proposed project.

Hazards and Hazardous Materials

Valley Floor Alternative One would result in fewer timeshare units and the dedication of additional open space. In the short-term, less earthmoving activities would take place that could result in accidental spills or release of hazardous construction-related materials. In the long-term, there would be a slight reduction in the use of hazardous materials within the project site. As identified in Section 3.7, Hazards and Hazardous Materials, the hazardous impacts would be considered less than significant. However, because Valley Floor Alternative One would result in less use of hazardous materials and fewer incidents for accidental spills or release of hazardous construction-related materials, this alternative would have fewer impacts to hazards and hazardous materials in comparison to the impacts of the proposed project.

Hydrology and Water Quality

Short-term Erosion and Water Quality

The proposed project would result in short-term erosion and water quality impacts that would be less than significant with mitigation measures. Valley Floor Alternative One would reduce the number of visitor-serving units by approximately 10 percent by eliminating development along a hillside. In the short-term, Valley Floor Alternative One would reduce the required earthmoving activities that would result in increased erosion and sedimentation. Therefore, this alternative would have fewer short-term erosion and water quality impacts.

Long-term Surface Water Runoff

The proposed project would result in long-term surface water runoff impacts that would be less than significant with mitigation measures. Valley Floor Alternative One would reduce the number of visitor-serving units by approximately 10 percent by eliminating development along a hillside. In the long-term, Valley Floor Alternative One would reduce impervious surfaces that would increase surface water runoff when compared to the proposed project. Therefore, this alternative would have fewer long-term surface water runoff impacts.

Long-term Surface Water Quality

The proposed project would result in long-term surface water quality impacts that would be less than significant with mitigation measures. Valley Floor Alternative One would reduce the number of visitor-serving units by approximately 10 percent by eliminating development along a hillside. In the long-term, Valley Floor Alternative One would reduce impervious surfaces and associated surface water runoff and urban contaminants that have an adverse impact on surface water quality when compared to the proposed project. Therefore, this alternative would have fewer long-term surface water quality impacts.

Long-term Water Supply

The proposed project would result in an impact to the Salinas Valley Groundwater Basin. Net groundwater use for proposed project would result in a reduction of 15.5 acre-feet per year flowing from the site to the groundwater basin, or 17.8 acre-feet per year if supplemental watering for wetland/riparian areas is required. Groundwater levels in the Forebay Aquifer and the groundwater basin would not be substantially affected by the required water withdrawals; therefore, the impact is considered less than significant.

Valley Floor Alternative One would reduce the number of visitor-serving units by almost 10 percent by eliminating development along a hillside, and therefore reduce water demand. Gross water demand would be reduced by 6.4 acre-feet per year. Net water demand, as a result of treating 90% of potable water as wastewater and using for landscape irrigation, would be reduced by approximately 0.64 acre-feet per year.

Two other factors influence changes to water use: 1) less rainwater will be collected and infiltrated, and 2) landscaping would likely be reduced due to a smaller development footprint. Rainwater is collected and infiltrated into the aquifer as part of the proposed low impact development (LID) practices described in this RDEIR. Fewer structures will lead to less of that runoff being collected and infiltrated. The reduction in landscaping would likely be less than 10 percent as landscaping around rooms is only a small portion of the landscaping for the overall resort. The net water use reduction estimated above would be a reduction of approximately four percent. With these two factors (rainwater infiltration and landscaping changes), the net water use would likely be reduced by between four and 10 percent. In the long-term, Valley Floor Alternative One would reduce groundwater demand by between four and 10 percent when compared to the proposed project. Therefore, this alternative would have fewer long-term water supply impacts.

Well Interference

Implementation of the proposed project would lower water levels in nearby wells. Calculations show that water levels would be reduced by up to 0.5 feet in the closest offsite well, which could affect that well's pumping rate by 0.27 percent. The lowering of the water level and pumping rate would not affect the well capacity or amount of water provided by that well. Effects on wells at greater distances would be less than 0.5 feet lowering of the water table, decreasing to no measurable effect farther from the project site. Therefore, this is considered a less than significant impact. Valley Floor Alternative One would reduce the number of visitor-serving units by approximately 10 percent by eliminating development along a hillside, and therefore reduce water demand by between four and 10 percent, and reduce the impact on neighboring wells. In the long-term, Valley Floor Alternative One would reduce net groundwater demand by four to 10 percent when compared to the proposed project. Therefore, this alternative would have fewer impacts on neighboring wells.

Potential Spring Impact

Implementation of the proposed project would lower water levels in the water table, which could affect flow from the spring that supplies water to neighboring property. The construction of an underground storage tank for treated wastewater could interrupt the flow of water to the spring. However, the project description includes a proposal to ensure the tank is constructed on a base that allows aquifer transmissivity. Therefore, the impact is considered less than significant.

Valley Floor Alternative One would reduce the number of visitor-serving units by approximately 10 percent by eliminating development along a hillside, and therefore reduce water demand by between four and 10 percent, and reduce the potential impact on the spring. In the long-term, Valley Floor Alternative One would reduce groundwater demand by between four and 10 percent when compared to the proposed project. Therefore, this alternative would have fewer potential impacts on the spring.

Effect on Salinas Valley Groundwater Levels

Implementation of the proposed project would result in a net reduction in groundwater flowing from the aquifer underlying the site by between 15.5 and 17.8 acre-feet per year. This would result in a lowering of the water table of up to 0.02 inches in the aquifer between the project site and the Salinas River, eight miles to the north and east. The project's net consumptive use on the Salinas Valley Groundwater Basin is a reduction of 0.002 percent of average annual recharge. Therefore, this is considered a less than significant impact.

Valley Floor Alternative One would reduce the number of visitor-serving units by approximately 10 percent and 19% of the available room count by eliminating development along a hillside, and therefore reduce water demand by four to 10 percent when compared to the proposed project. Therefore, this alternative would have fewer impacts to groundwater levels.

Groundwater Quality

The proposed project would use treated wastewater for irrigation. Evaporative concentration of irrigation water, and evaporation from the ornamental pond could increase total dissolved solids (TDS) in the groundwater; the use of certain types of water softening equipment could increase calcium carbonate levels in groundwater to a level that could exceed drinking water standards. Resort operations could affect water quality by increasing salinity. The impact related to increasing calcium carbonate would be less than significant with implementation of mitigation measures.

Valley Floor Alternative One would reduce the number of visitor-serving units by approximately 10 percent, and therefore reduce irrigation needs when compared to the proposed project. Therefore, this alternative would have fewer potential impacts to groundwater quality.

Wetland and Riparian Habitat Impact

The proposed project could lower the water table to a level that could adversely impact wetland or riparian vegetation. This impact would be less than significant with implementation of mitigation measures.

Valley Floor Alternative One would reduce the number of visitor-serving units by approximately 10 percent, and therefore reduce water demand by between four and 10 percent when compared to the proposed project. Therefore, this alternative would have fewer impacts to groundwater levels and associated wetland and riparian habitat.

<u>Noise</u>

Development creates short-term noise impacts from the operation of construction equipment and long-term noise impacts from increased vehicle traffic and operations. Under Valley Floor Alternative One, fewer timeshare units would be developed, and proportionally less noise from short-term construction or long-term operational activities would occur. As such, fewer noise impacts would occur. With the mitigation measures, as set forth in Section 3.10, Noise, all noise impacts from the proposed project were found to be less than significant. However, Valley Floor Alternative One would have fewer noise impacts in comparison to the proposed project due to a reduction in vehicle trips to the project site, less development areas requiring maintenance activities, and fewer guests occupying the site. Potential noise impacts from on-site operations would likely be approximately the same related to outdoor activities that will remain on the site with approximately 90 percent of the units, or 81 percent of the rooms, still being occupied and any day use activities being essentially unaffected by this reduction in timeshare units. Therefore, this alternative would have fewer construction-related noise impacts and operational noise impacts when compared to the impacts of the proposed project.

Public Services and Utilities

Wastewater Generation and Treatment

As discussed in Section 3.11, Public Services and Utilities, implementation of the proposed project would result in increased wastewater flows and includes construction of new wastewater treatment, distribution, and disposal facilities. The construction and operation of these facilities would result in a less than significant environmental impact. This alternative reduces the proposed number of units by 17 (approximately 10 percent) and therefore, would generate less wastewater and require less wastewater to be treated and, therefore, would have fewer impacts when compared to impacts of the proposed project.

Water Quality

The water supply for the proposed project currently exceeds the public health standard of 2.0 mg/L for fluoride. As discussed in Section 3.11, Public Services and Utilities, a mitigation measure is required to address water quality issues that would reduce the impact to a less than significant level. This alternative reduces the proposed number of units by 17 (approximately 10 percent) and, therefore, would have relatively less water demand and require less water to be treated. Therefore, this alternative would have fewer impacts when compared to impacts of the proposed project.

Storm Drainage Facilities

The proposed project would be required to detain the difference between the 100-year post-development storm runoff rate and the 10-year pre-development storm runoff rate. This may require the construction of new or expanded storm water detention facilities. As discussed in Section 3.11, Public Services and Utilities, the associated impacts are less than significant with mitigation measures. This alternative reduces the proposed number of units by 17 (approximately 10 percent) and subsequently, reduces the amount of impervious surfaces possibly requiring smaller detention facilities. It would, therefore, have fewer impacts when compared to impacts of the proposed project.

Solid Waste

The proposed project would result in construction and long-term solid waste. As discussed in Section 3.11, Public Services and Utilities, the associated impacts were determined to be less than significant.

This alternative reduces the proposed number of units by 17 (approximately 10 percent) and, therefore, would result in less solid waste delivered to the landfill. Therefore, this alternative would have fewer impacts when compared to impacts of the proposed project.

Other Public Services

Impacts to other public services, all determined to be less than significant as discussed in Section 3.11, would be similar to the proposed project.

Transportation and Traffic

Implementation of Valley Floor Alternative One would result in elimination of the proposed 17 timeshare villa lots (9.4 percent of total units). Each of the villa timeshare units generates 9.57 vehicle trips per day, not including credit for shuttle use. A traffic model run for this alternative was generated to identify project trip generation (Jeffrey Waller, Mott MacDonald, email to consultant, August 11, 2017). The net trip generation for this alternative was projected to be 306 average daily trips at 100 percent occupancy and 214 average daily trips at 70 percent occupancy. This alternative would result in approximately 25 percent less traffic than would the proposed project.

The project, as designed, does not require mitigation as no potentially significant environmental impacts were identified. This 25 percent reduction in project trips would not change the levels of service nor affect the applicant's proposed improvements to Paraiso Springs Road. The elimination of 34 parking spaces associated with the villa timeshare units would be within the same footprint as the development footprint shown on the tentative map. Therefore, because Valley Floor Alternative One would reduce the generation of construction-related vehicle trips and long-term operational traffic, as well as require fewer parking spaces, this alternative would have fewer transportation and circulation impacts in comparison to the impacts of the proposed project.

Conclusion

The smaller footprint and fewer timeshare units proposed by Valley Floor Alternative One would result in corresponding fewer impacts to all environmental issue areas with the exception of impacts to Climate Change, which would have similar impacts to the proposed project. Valley Floor Alternative One would result in 17 fewer timeshare units, which would reduce the room count by 59 rooms, and, therefore, would meet the proposed project objectives to a lesser degree compared to the proposed project. The objectives met to a lesser degree under this alternative include development of 50 acres of the project site, providing an economically sustainable combination of hotel units and timeshare units of varying sizes, maximizing development of this previously disturbed site, reducing pressure on the conversion of other agricultural areas to provide tourist accommodations related to the Winery Corridor, and providing a world class spa-resort in the Central Salinas Valley.

5.2.3 Alternative #3: Valley Floor Alternative Two

The second valley floor alternative would also substantially reduce the proposed development on slopes exceeding 30 percent, as was done for Valley Floor Alternative One. The objective of this alternative is to create better consistency with County policy related to development on slopes exceeding 30 percent, minimize retaining walls, and minimize the visibility of development on the site from surrounding areas, while preserving five timeshare villas. This alternative would involve the following modifications to the site plan:

- 1. Redesign and/or relocate the parking area for the hamlet.
- 2. Relocate the timeshare condominium units on lots 21 and 22 from their current location along a hillside in an area that requires encroachment onto 30 percent slopes to Indian Valley in the location of the proposed villa timeshare lots. This alternative would remove 12 of the 17 proposed villa timeshare lots and relocate the timeshare condominium units into this area.
- 3. Remove the northern access road to the timeshare condominiums in lot 23. This proposed access road is along a very steep hillside. The timeshare condominiums on Lot 23 would be provided with access along the path of the existing service road.

The result of these changes would be the retention and relocation of 60 timeshare condominium units and retention of five timeshare villa units and the elimination of 12 timeshare villa lots. This results in almost a seven percent reduction in visitor serving units being constructed on site (from 180 to 168) and a reduction of the room count by 42 rooms. The outcome would be removal of development at higher and more visible locations, a reduction in grading and development on steeper slopes, and reducing the

need for retaining walls. This alternative is largely reflected in Figure 5.1, Alternative #3: Valley Floor Alternative Two, also titled "Hillside Duplex Study"; however, this figure does not reflect any redesign of hamlet parking or removal of the northern access road to lot 23.

Impact Analysis

Aesthetics

The smaller footprint under Valley Floor Alternative Two would result in fewer visual changes to the project site. Fewer structures would be built; therefore, fewer trees and other vegetation would be removed, and fewer sources of light and glare would be introduced within the project site. As stated in Section 3.1, Aesthetics and Visual Resources, tree planting will occur in accordance with Section 21.64.260 of the Monterey County Code. In addition, Valley Floor Alternative Two would substantially avoid slopes greater than 30 percent particularly on lot #23. Under the proposed project, the condominiums on lots #21 and #22 would be visible from Paraiso Springs Road. Relocation of these units from this hillside would retain the existing visual character of the site when viewed from nearby off-site locations. These lots would then remain as undeveloped open space and would be dedicated for scenic enjoyment for the remainder of the project site and those viewing the site from a distance. Implementation of the proposed project is not expected to substantially degrade the existing visual quality or character of the project site or surrounding area, and all impacts herein were found to be less than significant with mitigation measures as outlined in Section 3.1, Aesthetics and Visual Resources. However, Valley Floor Alternative Two would have fewer impacts on aesthetics, vegetation removal, and light and glare than the proposed project impacts, with a reduction in development and an emphasis on keeping development at lower elevations.

Air Quality

Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities. Therefore, slightly less particulate matter from short-term construction would occur under Valley Floor Alternative Two. In addition, the reduction of the number of units developed would correspondingly reduce construction exhaust emissions associated with construction activities. The elimination of timeshare units would reduce vehicular trips and long-term vehicular emissions generated by development within the project site. As such, fewer impacts to air quality would occur. With implementation of mitigation measures, as outlined in Section 3.2, Air Quality, impacts regarding air quality were found to be less than significant. However, this alternative would have fewer impacts on air quality relative to the impacts of the proposed project due to less grading, resulting in less construction vehicle exhaust emissions and less dust generated, and slightly lower operational emissions related to vehicle exhaust and emissions from energy use.

Biological Resources

Valley Floor Alternative Two would result in fewer timeshare units and, subsequently, additional open space. As such, there would be fewer disturbances to existing plant and





Note: This figure does not reflect any redesign of hamlet parking or removal of the northern access road to lot 23.



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Source: HKS 2017

Figure 5-1 Alternative #3: Valley Floor Alternative Two

Paraiso Springs Resort EIR

5.0 Alternatives

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wildlife habitats, including the removal of approximately 16 less oak trees and other vegetation. Also, as this alternative would have fewer impacts to wildlife habitat, the potential impacts to special-status wildlife species would also be reduced. This alternative would not, however, result in a reduction of wetland impacts when compared with the proposed project.

As identified in Section 3.3, Biological Resources, biological resource impacts resulting from implementation of the proposed project can be mitigated to less than significant. However, because this alternative would result in less destruction or disturbance of biological resources with the exception of potential impacts to wetlands, this alternative would lessen the biological impacts associated with the proposed project.

Climate Change

Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities, site operations that utilize electricity or use fuel, and transportation emissions (direct or indirect). Less particulate matter from short-term construction would occur under this reduced project alternative. The reduction of the number of units developed, and locating development on gentler slopes, would reduce grading activities, which will reduce construction exhaust emissions associated with construction activities. The elimination of twelve villa units would reduce vehicular trips and long-term vehicular emissions generated by development within the project site. The proposed project includes a provision to design the project such that no net increase in contributions to climate change will occur, as discussed in Section 3.4, Climate Change. This alternative analysis assumes that a reduction of less than seven percent of the units will allow no net increase in contributions to climate change impacts would be the same as the impacts of the proposed project.

Cultural Resources

The impacts to archaeological resources through construction of the proposed project were found to be less than significant with mitigation. However, as identified in Section 3.5, Cultural Resources, impacts to historic resources resulting from implementation of the proposed project cannot be mitigated to a less than significant level due to previous removal of the nine individually significant Victorian-era cottages in 2003.

Valley Floor Alternative Two would result in fewer timeshare units and additional open space. As such, there would be a slight reduction in the potential for the disturbance or destruction of unique archaeological resources or paleontological resources. The project applicant would still be required to implement mitigation measures incorporated herein to reduce the impacts to historic resources to the extent feasible. Even with implementation of these mitigation measures, as these historic resources cannot be recreated, this would continue to be a significant and unavoidable impact under Valley Floor Alternative Two and would result in no change in comparison to the impacts of the proposed project.

For other potential cultural resource impacts related to Native American and unique archaeological resources, impacts under the Valley Floor Alternative Two would result in less potential impact in comparison to the impacts of the proposed project.

Geology and Soils

The project site is subject to earthquakes and seismic ground shaking. In addition, the project site may be subject to secondary seismic effects such as liquefaction and landslides. Valley Floor Alternative Two would result in a smaller construction footprint and fewer timeshare units in comparison to the proposed project. The reduction in timeshare units would reduce exposure of persons and structures to seismic hazards. There would be a lower potential for short-term, construction related erosion to occur and, therefore, would have a lower potential to create adverse impacts. In addition, the additional open space would result in the permanent preservation of many of the steep slopes on the project site. This could reduce potential adverse impacts from long-term erosion hazards and landsliding. Therefore, fewer impacts would occur under this alternative. As identified in Section 3.6, Geology and Soils, with the incorporation of the recommended mitigation measures, the proposed project will have a less than significant effect on geology and soils. However, Valley Floor Alternative Two would result in fewer buildings at the project site. As such, because there would be fewer units within a seismic hazard area and less potential for short- and long-term erosion, this alternative is viewed as having less impact associated with seismic hazards in comparison to the impacts of the proposed project.

This alternative does, however, eliminate some development on the hillsides and, therefore, the hazards associated with potential landslides are lessened when compared with the impacts of the proposed project.

Hazards and Hazardous Materials

Valley Floor Alternative Two would result in fewer timeshare units and the dedication of additional open space. In the short-term, less earthmoving activities would take place that could result in accidental spills or release of hazardous construction-related materials. In the long-term, there would be a slight reduction in the use of hazardous materials within the project site. As identified in Section 3.7, Hazards and Hazardous Materials, the hazardous impacts would be considered less than significant. However, because Valley Floor Alternative Two would result in less use of hazardous materials and fewer opportunities for accidental spills or release of hazardous construction-related materials, this alternative would have fewer impacts to hazardous and hazardous materials in comparison to the impacts of the proposed project.

Hydrology and Water Quality

Short-term Erosion and Water Quality

The proposed project would result in short-term erosion and water quality impacts that would be less than significant with mitigation measures. Valley Floor Alternative Two would reduce the number of visitor-serving units by 6.7 percent by eliminating development along a hillside. In the short-term, Valley Floor Alternative Two would reduce the required earthmoving activities that would result in increased erosion and sedimentation. Therefore, this alternative would have fewer short-term erosion and water quality impacts.

Long-term Surface Water Runoff

The proposed project would result in long-term surface water runoff impacts that would be less than significant with mitigation measures. Valley Floor Alternative Two would reduce the number of visitor-serving units by 6.7 percent by eliminating development along a hillside. In the long-term, Valley Floor Alternative Two would reduce impervious surfaces that would increase surface water runoff when compared to the proposed project. Therefore, this alternative would have fewer long-term surface water runoff impacts.

Long-term Surface Water Quality

The proposed project would result in long-term surface water quality impacts that would be less than significant with mitigation measures. Valley Floor Alternative Two would reduce the number of visitor-serving units by 6.7 percent by eliminating development along a hillside. In the long-term, Valley Floor Alternative Two would reduce impervious surfaces and associated surface water runoff and urban contaminants that have an adverse impact on surface water quality when compared to the proposed project. Therefore, this alternative would have fewer long-term surface water quality impacts.

Long-term Water Supply

The proposed project would result in an impact to the Salinas Valley Groundwater Basin. Net groundwater use for proposed project would result in a reduction of 15.5 acre-feet per year flowing from the site to the groundwater basin, or 17.8 acre-feet per year if supplemental watering for wetland/riparian areas is required. Groundwater levels in the Forebay Aquifer and the groundwater basin would not be substantially affected by the required water withdrawals; therefore, the impact is considered less than significant.

Valley Floor Alternative Two would reduce the number of visitor-serving units by 6.7 percent by eliminating development along a ridge, and therefore reduce water demand. Gross water demand would be reduced by 4.6 acre-feet per year. Net water demand, as a result of treating 90% of potable water as wastewater and using for landscape irrigation, would be reduced by approximately 0.46 acre-feet per year.

Two other factors influence changes to water use: 1) less rainwater will be collected and infiltrated, and 2) landscaping would likely be reduced due to a smaller development footprint. Rainwater is collected and infiltrated into the aquifer as part of the proposed low impact development (LID) practices described in this RDEIR. Less structures will lead to less of that runoff being collected and infiltrated. The reduction in landscaping would likely be less than 6.7 percent as landscaping around rooms is only a small portion of the landscaping for the overall resort. The net water use reduction estimated above would be a reduction of approximately three percent. With these two factors (rainwater infiltration and landscaping changes), the net water use would likely be reduced by between three and 6.7 percent. In the long-term, Valley Floor Alternative Two would reduce groundwater demand by up to 6.7 percent when compared to the proposed project. Therefore, this alternative would have fewer long-term water supply impacts.

Effect on Salinas Valley Groundwater Levels

Implementation of the proposed project would result in a net reduction in groundwater flowing from the aquifer underlying the site by between 15.5 and 17.8 acre-feet per year.

This would result in a lowering of the water table of up to 0.02 inches in the aquifer between the project site and the Salinas River, eight miles to the north and east. The project's net consumptive use on the Salinas Valley Groundwater Basin is a reduction of 0.002 percent of average annual recharge. Therefore, this is considered a less than significant impact.

Valley Floor Alternative Two would reduce the number of visitor-serving units by 6.7 percent by eliminating development along a hillside, and therefore reduce water demand by between three and 6.7 percent when compared to the proposed project. Therefore, this alternative would have fewer impacts to groundwater levels.

Well Interference

Implementation of the proposed project would lower water levels in nearby wells. Calculations show that water levels would be reduced by up to 0.5 feet in the closest offsite well, which could affect that well's pumping rate by 0.27 percent. The lowering of the water level and pumping rate would not affect the well capacity or amount of water provided by that well. Effects on wells at greater distances would be less than 0.5 feet lowering of the water table, decreasing to no measurable effect farther from the project site. Therefore, this is considered a less than significant impact.

Valley Floor Alternative Two would reduce the number of visitor-serving units by 6.7 percent by eliminating development along a hillside, and therefore reduce water demand by between three and 6.7 percent, and reduce the impact on neighboring wells. In the long-term, Valley Floor Alternative Two would reduce groundwater demand by between three and 6.7 percent when compared to the proposed project. Therefore, this alternative would have fewer impacts on neighboring wells.

Potential Spring Impact

Implementation of the proposed project would lower water levels in the water table, which could affect flow from the spring that supplies water to neighboring property. The construction of an underground storage tank for treated wastewater could interrupt the flow of water to the spring. However, the project description includes a proposal to ensure the tank is constructed on a base that allows aquifer transmissivity. Therefore, the impact is considered less than significant.

Valley Floor Alternative Two would reduce the number of visitor-serving units by 6.7 percent by eliminating development along a hillside, and therefore reduce water demand by between three and 6.7 percent, and reduce the potential impact on the spring. In the long-term, Valley Floor Alternative Two would reduce groundwater demand by between three and 6.7 percent when compared to the proposed project. Therefore, this alternative would have fewer potential impacts on the spring.

Groundwater Quality

The proposed project would use treated wastewater for irrigation. Evaporative concentration of irrigation water, and evaporation from the ornamental pond could increase total dissolved solids (TDS) in the groundwater; the use of certain types of water softening equipment could increase calcium carbonate levels in groundwater to a level

that could exceed drinking water standards. Resort operations could affect water quality by increasing salinity. The impact related to increasing calcium carbonate would be less than significant with implementation of mitigation measures.

Valley Floor Alternative Two would reduce the number of visitor-serving units by 6.7 percent, and therefore reduce irrigation needs when compared to the proposed project. Therefore, this alternative would have fewer potential impacts to groundwater quality.

Wetland and Riparian Habitat Impact

The proposed project could lower the water table to a level that could adversely impact wetland or riparian vegetation. This impact would be less than significant with implementation of mitigation measures.

Valley Floor Alternative Two would reduce the number of visitor-serving units by 6.7 percent, and therefore reduce water demand by between three and 6.7 percent when compared to the proposed project. Therefore, this alternative would have fewer impacts to groundwater levels and associated wetland and riparian habitat.

<u>Noise</u>

Development creates short-term noise impacts from the operation of construction equipment and long-term noise impacts from increased vehicle traffic and operations. Under Valley Floor Alternative Two, fewer timeshare units would be developed, and proportionally less noise from short-term construction or long-term operational activities would occur. As such, fewer noise impacts would occur. With the mitigation measures, as set forth in Section 3.10, Noise, all noise impacts from the proposed project were found to be less than significant. However, Valley Floor Alternative Two would have fewer noise impacts in comparison to the impacts of the proposed project due to a reduction in vehicle trips to the project site, less development areas requiring maintenance activities, and fewer guests occupying the site. Potential noise impacts from on-site operations would likely be approximately the same related to outdoor activities that will remain on the site with approximately 93 percent of the units still being occupied, and approximately 86 percent of the rooms, and any day use activities being essentially unaffected by this reduction in timeshare units. Therefore, this alternative would have fewer construction-related noise impacts and operational noise impacts when compared to the impacts of the proposed project.

Public Services and Utilities

Wastewater Generation and Treatment

As discussed in Section 3.11, Public Services and Utilities, implementation of the proposed project would result in increased wastewater flows and includes construction of new wastewater treatment, distribution, and disposal facilities. The construction and operation of these facilities would result in a less than significant environmental impact. This alternative reduces the proposed number of units by 12 (6.7 percent) and therefore, would generate less wastewater and require less wastewater to be treated and, therefore, would have fewer impacts when compared to impacts of the proposed project.

Water Quality

The water supply for the proposed project currently exceeds the public health standard of 2.0 mg/L for fluoride. As discussed in Section 3.11, Public Services and Utilities, a mitigation measure is required to address water quality issues that would reduce the impact to a less than significant level. This alternative reduces the proposed number of units by 12 (6.7 percent) and, therefore, would have relatively less water demand and require less water to be treated. Therefore, this alternative would have fewer impacts when compared to impacts of the proposed project.

Storm Drainage Facilities

The proposed project would be required to detain the difference between the 100-year post-development storm runoff rate and the 10-year pre-development storm runoff rate. This may require the construction of new or expanded storm water detention facilities. As discussed in Section 3.11, Public Services and Utilities, the associated impacts are less than significant with mitigation measures. This alternative reduces the proposed number of units by 12 (6.7 percent) and, subsequently, reduces the amount of impervious surfaces possibly requiring smaller detention facilities. It would, therefore, have fewer impacts when compared to impacts of the proposed project.

Solid Waste

The proposed project would result in construction and long-term solid waste. As discussed in Section 3.11, Public Services and Utilities, the associated impacts were determined to be less than significant.

This alternative reduces the proposed number of units by 12 (6.7 percent) and therefore, would result in less solid waste delivered to the landfill. Therefore, this alternative would have fewer impacts when compared to impacts of the proposed project.

Other Public Services

Impacts to other public services, all determined to be less than significant as discussed in Section 3.11, would be similar to the proposed project.

Transportation and Traffic

Implementation of Valley Floor Alternative Two would result in elimination of 12 of the proposed 17 timeshare villa lots (6.7 percent of total units). Each of the villa timeshare units generates 9.57 vehicle trips per day, not including credit for shuttle use. A traffic model run for this alternative was generated to identify project trip generation. It is included as section 9 and exhibit 18D, Alternative Project Buildout Trip Generation, of the Hatch Mott MacDonald report dated March 17, 2017. The net trip generation for this alternative was projected to be 339 average daily trips at 100 percent occupancy and 237 average daily trips at 70 percent occupancy. This alternative would result in approximately 16.5 percent less traffic than would the proposed project.

The project, as designed, does not require mitigation as no potentially significant environmental impacts were identified. This 16.5 percent reduction in project trips would not change the levels of service nor affect the proposed improvements to Paraiso Springs Road. The elimination of 24 parking spaces associated with the villa timeshare units would be within the same footprint as the development footprint shown on the tentative map. Therefore, because Valley Floor Alternative Two would reduce the generation of construction-related vehicle trips and long-term operational traffic, as well as require fewer parking spaces, this alternative would have fewer transportation and circulation impacts in comparison to the impacts of the proposed project.

Conclusion

The smaller footprint and fewer timeshare units proposed by Valley Floor Alternative Two would result in corresponding fewer impacts to all environmental issue areas with the exception of impacts to Climate Change, which would have similar impacts to the proposed project. Valley Floor Alternative Two would result in 12 fewer timeshare units, which would reduce the room count by 42 rooms, and, therefore, would meet the proposed project objectives to a slightly lesser degree compared to the proposed project site, providing an economically sustainable combination of hotel units and timeshare units of varying sizes, maximizing development of this previously disturbed site, reducing pressure on the conversion of other agricultural areas to provide tourist accommodations related to the Winery Corridor, and providing a world class spa-resort in the Central Salinas Valley.

5.2.4 Alternative #4 – Reduced Project Alternative – Phases 1 and 2 Project

The reduced project alternative would eliminate the third and fourth phases of the project. The resulting project would consist of 75 hotel units (77 rooms), nine timeshare villas (five 3 bedroom and four 4 bedroom), 32 timeshare condominiums (18 two bedroom and 14 three bedroom units), for an overall reduction of 64 units or 35.5 percent, while maintaining all the other uses proposed for the resort. The overall room count would be reduced from 310 to 186. The objective of this alternative is to create a reduced intensity and development footprint, which reduces impacts on biological resources, results in a substantial reduction in grading quantities and related short-term air quality impacts, reduces net groundwater use, reduces traffic and its associated noise, and minimizes the visibility of development on the site from the surrounding area. This alternative would involve the following modifications to the site plan:

- 1. Redesign the parking area adjacent to lots 21 and 22 such that the parking lot does not encroach into 30 percent slope;
- 2. Eliminate the timeshare condominium units on lots 21 and 22 from their current location along a hillside in an area that requires encroachment onto 30 percent slopes to Indian Valley in the location of the villa lots. This alternative would relocate all the timeshare units to the area of the timeshare villas and in areas between the villa area and Phases 1 and 2 of the hotel;
- 3. Remove the access road to the timeshare condominiums in lot 23. The proposed condominium access road is along a very steep hillside; and
- 4. Eliminate Phase 3 and 4 units from the proposal.

The result of these changes would be the reduction of the hotel from 103 to 75 units, reduction of villa timeshares from 17 to nine, and reduction of the condominium timeshares from 60 to 32, and retention of the following: spa amenities, hamlet, day spa, and the appurtenant facilities related to the main hotel operations. The outcome would be removal of development, which allows for a smaller development footprint, reduced slope incursions at higher and more visible locations, substantially less grading, less groundwater use, and less traffic during operations.

Impact Analysis

<u>Aesthetics</u>

The smaller footprint under this reduced project alternative would result in fewer visual changes to the project site. Fewer structures would be built: therefore, fewer trees and other vegetation would be removed, and fewer sources of light and glare would be introduced within the project site. As stated in Section 3.1, Aesthetics and Visual Resources, planting of trees will occur in accordance with Section 21.64.260 of the Monterey County Code. In addition, the reduced project alternative would reduce incursion on, or completely avoid, slopes greater than 30 percent on lot #23. Under the proposed project, the condominiums on lots #21 and #22 would be visible from Paraiso Springs Road and from long-range views from the Salinas Valley. Relocation of the reduced number of condominium timeshare units to the area where some villa lots are eliminated and between the villa lots and the hotel would more closely retain the existing views of the site from off site. These lots would then remain as undeveloped open space and would be available for scenic enjoyment for the remainder of the project site and those viewing the site from a distance. Implementation of the proposed project is not expected to substantially degrade the existing visual quality or character of the project site or surrounding area, with the mitigation measures identified, and all impacts herein were found to be less than significant as outlined in Section 3.1, Aesthetics and Visual Resources. However, the reduced project alternative would have fewer impacts on aesthetics, light, and glare than the proposed project with a reduction in development and an emphasis on keeping development at lower elevations.

<u>Air Quality</u>

Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities. Therefore, less particulate matter from short-term construction would occur under this reduced project alternative. Dust generation and emissions from Phases 1 and 2 would not change, but later impacts from Phase 3 and Phase 4 construction would be eliminated. In addition, the reduction of the number of units developed would correspondingly reduce construction exhaust emissions associated with construction activities for Phases 3 and 4. The elimination of many hotel and timeshare units would reduce vehicular trips and long-term vehicular emissions generated by development within the project site. As such, fewer impacts to air quality would occur. With implementation of mitigation measures, as outlined in Section 3.2, Air Quality, impacts regarding air quality were found to be less than significant. However, this alternative would have fewer impacts on air quality relative to the impacts of the proposed project.

Biological Resources

The reduced project alternative would result in elimination of many hotel and timeshare units and, subsequently, additional open space. As such, there would be fewer disturbances to existing plant and wildlife habitats, including the removal of oak trees and other vegetation. Also, as this alternative would have fewer impacts to wildlife habitat, the potential impacts to special-status wildlife species would also be reduced. This alternative would not, however, result in a reduction of wetland impacts when compared with the proposed project.

As identified in Section 3.3, Biological Resources, biological resource impacts resulting from implementation of the proposed project can be mitigated to less than significant. However, because this alternative would result in less destruction or disturbance of biological resources with the exception of potential impacts to wetlands, this alternative would lessen the biological impacts associated with the proposed project.

Climate Change

Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities, site operations that utilize electricity or use fuel, and transportation emissions (direct or indirect). Less particulate matter from short-term construction would occur under this reduced project alternative. The reduction of the number of units developed, and locating development on gentler slopes, would reduce grading activities, which will reduce construction exhaust emissions associated with construction activities. The elimination of 36 timeshare and 28 hotel units would reduce vehicular trips and long-term vehicular emissions generated by development within the project site. The proposed project includes a provision to design the project such that no net increase in contributions to climate change will occur, as discussed in Section 3.4, Climate Change. This alternative would require the same mitigation measures as the project in order for this alternative's greenhouse gas emissions to remain at net zero. Therefore, this alternative's climate change impacts are the same as the proposed project.

Cultural Resources

The impacts to archaeological resources through construction of the proposed project were found to be less than significant with mitigation. However, as identified in Section 3.5, Cultural Resources, impacts to historic resources resulting from implementation of the proposed project cannot be mitigated to a less than significant level due to previous removal of the nine individually significant Victorian-era cottages in 2003.

The reduced project alternative would result in the elimination of many hotel and timeshare units, substantial reduction in grading and vegetation removal, and the addition of open space. As such, there would be a reduction in the potential for the disturbance or destruction of unique archaeological resources or paleontological resources. The project applicant would still be required to implement mitigation measures incorporated herein to reduce the impacts to historic resources to the extent feasible. Even with implementation of these mitigation measures, as these historic resources cannot be recreated, this would continue to be a significant and unavoidable impact under the reduced project alternative and would result in no change in comparison to the proposed project.

For other potential cultural resource impacts related to Native American and unique archaeological resources, impacts under the Reduced Project Alternative would result in less potential impact in comparison to the proposed project.

Geology and Soils

The project site is subject to earthquakes and seismic ground shaking. In addition, the project site may be subject to secondary seismic effects such as liquefaction and landslides. The reduced project alternative would result in a smaller construction footprint and the elimination of 64 hotel and timeshare units in comparison to the proposed project. The elimination of some units would reduce exposure of persons and structures to seismic hazards. There would be a lower potential for short-term, construction related erosion to occur and, therefore, would have a lower potential to create adverse impacts. In addition, the additional open space would result in eliminating disturbance of many of the steep slopes on the project site. This could reduce potential adverse impacts from long-term erosion hazards and landsliding. Therefore, fewer impacts would occur under this alternative. As identified in Section 3.6, Geology and Soils, with the incorporation of the recommended mitigation measures, the proposed project will have a less than significant effect on geology and soils. The reduced project alternative would result in fewer buildings at the project site. As such, because there would be fewer units within a seismic hazard area and less potential for short- and longterm erosion, this alternative is viewed as having less impact associated with seismic hazards in comparison to the impacts of the proposed project.

This alternative does, however, eliminate some development on hillsides and, therefore, the hazards associated with potential landslides are lessened when compared with the impacts of the proposed project.

Hazards and Hazardous Materials

The reduced project alternative would result in the elimination of many hotel and timeshare units and the preservation of additional open space. In the short-term, less earthmoving activities would take place that could result in accidental spills or release of hazardous construction-related materials. In the long-term, there would be a reduction in the use of hazardous materials within the project site. As identified in Section 3.7, Hazards and Hazardous Materials, the hazardous impacts would be considered less than significant. However, because the reduced project alternative would result in less use of hazardous materials and fewer opportunities for accidental spills or release of hazardous construction-related materials, this alternative would have fewer impacts to hazards and hazardous materials in comparison to the proposed project.

Hydrology and Water Quality

Short-term Erosion and Water Quality

The proposed project would result in short-term erosion and water quality impacts that would be less than significant with mitigation measures. The Reduced Project Alternative would reduce the number of visitor-serving units by 35.5 percent. In the short-term, the Reduced Project Alternative would reduce the required earthmoving activities that would result in increased erosion and sedimentation. Therefore, this alternative would have fewer short-term erosion and water quality impacts.

Long-term Surface Water Runoff

The proposed project would result in long-term surface water runoff impacts that would be less than significant with mitigation measures. The Reduced Project Alternative would reduce the number of visitor-serving units by 35.5 percent. In the long-term, the Reduced Project Alternative would reduce impervious surfaces that would increase surface water runoff when compared to the proposed project. Therefore, this alternative would have fewer long-term surface water runoff impacts.

Long-term Surface Water Quality

The proposed project would result in long-term surface water quality impacts that would be less than significant with mitigation measures. The Reduced Project Alternative would reduce the number of visitor-serving units by 35.5 percent. In the long-term, the Reduced Project Alternative would reduce impervious surfaces and associated surface water runoff and urban contaminants that have an adverse impact on surface water quality when compared to the proposed project. Therefore, this alternative would have fewer long-term surface water quality impacts.

Long-term Water Supply

The proposed project would result in an impact to the Salinas Valley Groundwater Basin. Net groundwater use for proposed project would result in a reduction of 15.5 acre-feet per year flowing from the site to the groundwater basin, or 17.8 acre-feet per year if supplemental watering for wetland/riparian areas is required. Groundwater levels in the Forebay Aquifer and the groundwater basin would not be substantially affected by the required water withdrawals; therefore, the impact is considered less than significant.

The Reduced Project Alternative would reduce the number of visitor-serving units by 35.5 percent by eliminating development, and therefore reduce water demand. Gross water demand would be reduced by 14.3 acre-feet per year. Net water demand, as a result of treating 90% of potable water as wastewater and using for landscape irrigation, would be reduced by approximately 1.4 acre-feet per year.

Two other factors influence changes to net water use: 1) less rainwater will be collected and infiltrated, and 2) landscaping would likely be reduced due to a smaller development footprint. Rainwater is collected and infiltrated into the aquifer as part of the proposed low impact development (LID) practices described in this RDEIR. Less structures will lead to less of that runoff being collected and infiltrated. The reduction in landscaping would likely be substantially less than 35.5 percent as landscaping around rooms is only a small portion of the landscaping for the overall resort. The net water use reduction estimated above would be a reduction of approximately nine percent. With these two factors (rainwater infiltration and landscaping changes), the net water use would likely be reduced by between nine and 35.5 percent. In the long-term, the Reduced Project Alternative One would reduce groundwater demand when compared to the proposed project. Therefore, this alternative would have fewer long-term water supply impacts.

Well Interference

Implementation of the proposed project would lower water levels in nearby wells. Calculations show that water levels would be reduced by up to 0.5 feet in the closest offsite well, which could affect that well's pumping rate by 0.27 percent. The lowering of the water level and pumping rate would not affect the well capacity or amount of water provided by that well. Effects on wells at greater distances would be less than 0.5 feet lowering of the water table, decreasing to no measurable effect farther from the project site. Therefore, this is considered a less than significant impact.

The Reduced Project Alternative would reduce the number of visitor-serving units by 35.5 percent, and therefore reduce water demand by between nine and 35.5 percent, and reduce the impact on neighboring wells. In the long-term, the Reduced Project Alternative would reduce groundwater demand by between nine and 35.5 percent when compared to the proposed project. Therefore, this alternative would have fewer impacts on neighboring wells.

Potential Spring Impact

Implementation of the proposed project would lower water levels in the water table, which could affect flow from the spring that supplies water to neighboring property. The construction of an underground storage tank for treated wastewater could interrupt the flow of water to the spring. However, the project description includes a proposal to ensure the tank is constructed on a base that allows aquifer transmissivity. Therefore, the impact is considered less than significant.

The Reduced Project Alternative would reduce the number of visitor-serving units by 35.5 percent, and therefore reduce water demand by between nine and 35.5 percent, and reduce the potential impact on the spring. In the long-term, the Reduced Project Alternative would reduce groundwater demand by between nine and 35.5 percent when compared to the proposed project. Therefore, this alternative would have fewer potential impacts on the spring.

Effect on Salinas Valley Groundwater Levels

Implementation of the proposed project would result in a net reduction in groundwater flowing from the aquifer underlying the site by between 15.5 and 17.8 acre-feet per year. This would result in a lowering of the water table of up to 0.02 inches in the aquifer between the project site and the Salinas River, eight miles to the north and east. The project's net consumptive use on the Salinas Valley Groundwater Basin is a reduction of 0.002 percent of average annual recharge. Therefore, this is considered a less than significant impact.

The Reduced Project Alternative would reduce the number of visitor-serving units by 35.5 percent, and therefore reduce water demand by between nine and 35.5 percent when compared to the proposed project. Therefore, this alternative would have fewer impacts to groundwater levels.

Groundwater Quality

The proposed project would use treated wastewater for irrigation. Evaporative concentration of irrigation water, and evaporation from the ornamental pond could increase total dissolved solids (TDS) in the groundwater; the use of certain types of water softening equipment could increase calcium carbonate levels in groundwater to a level

that could exceed drinking water standards. Resort operations could affect water quality by increasing salinity. The impact related to increasing calcium carbonate would be less than significant with implementation of mitigation measures.

The Reduced Project Alternative would reduce the number of visitor-serving units by 35.5 percent, and therefore reduce irrigation needs when compared to the proposed project. Therefore, this alternative would have fewer potential impacts to groundwater quality.

Wetland and Riparian Habitat Impact

The proposed project could lower the water table to a level that could adversely impact wetland or riparian vegetation. This impact would be less than significant with implementation of mitigation measures.

The Reduced Project Alternative would reduce the number of visitor-serving units by 35.5 percent, and therefore reduce water demand by between nine and 35.5 percent when compared to the proposed project. Therefore, this alternative would have fewer impacts to groundwater levels and associated wetland and riparian habitat.

<u>Noise</u>

Development creates short-term noise impacts from the operation of construction equipment and long-term noise impacts from increased vehicle traffic and operations. Under the Reduced Project Alternative, many hotel and timeshare units would be eliminated, and proportionally less noise from short-term construction or long-term operational activities would occur. As such, fewer noise impacts would occur. With the mitigation measures, as set forth in Section 3.10, Noise, all noise impacts from the proposed project were found to be less than significant. The reduced project alternative would have fewer noise impacts in comparison to the proposed project due to a reduction in vehicle trips to the project site and the elimination of two construction phases. Potential noise impacts from on-site operations would likely be approximately the same related to outdoor activities that will remain on the site with approximately 64 percent of the units, and approximately 60 percent of the rooms, still being occupied and any day use activities being essentially unaffected by this reduction in timeshare and hotel units.

Public Services and Utilities

Wastewater Generation and Treatment

As discussed in Section 3.11, Public Services and Utilities, implementation of the proposed project would result in increased wastewater flows and includes construction of new wastewater treatment, distribution, and disposal facilities. The construction and operation of these facilities would result in a less than significant environmental impact. This alternative reduces the proposed number of units by 64 (35.5 percent) and, therefore, would generate less wastewater and require less wastewater to be treated and therefore, would have fewer impacts when compared to impacts of the proposed project.

Water Quality

The water supply for the proposed project currently exceeds the public health standard of 2.0 mg/L for fluoride. As discussed in Section 3.11, Public Services and Utilities, a mitigation measure is required to address water quality issues that would reduce the impact to a less than significant level. This alternative reduces the proposed number of units by 64 (35.5 percent) and, therefore, would have relatively less water demand and require less water to be treated. Therefore, this alternative would have fewer impacts when compared to impacts of the proposed project.

Storm Drainage Facilities

The proposed project would be required to detain the difference between the 100-year post-development storm runoff rate and the 10-year pre-development storm runoff rate. This may require the construction of new or expanded storm water detention facilities. As discussed in Section 3.11, Public Services and Utilities, the associated impacts are less than significant with mitigation measures. This alternative reduces the proposed number of units by 64 (35.5 percent) and, subsequently, reduces the amount of impervious surfaces possibly requiring smaller detention facilities. It would, therefore, have fewer impacts when compared to impacts of the proposed project.

Solid Waste

The proposed project would result in construction and long-term solid waste. As discussed in Section 3.11, Public Services and Utilities, the associated impacts were determined to be less than significant.

This alternative reduces the proposed number of units by 64 (35.5 percent) and therefore, would result in less solid waste delivered to the landfill. Therefore, this alternative would have fewer impacts when compared to impacts of the proposed project.

Other Public Services

Impacts to other public services, all determined to be less than significant as discussed in Section 3.11, would be similar to the proposed project.

Transportation and Traffic

Implementation of the Reduced Project Alternative would result in elimination of 28 of the hotel units, 8 of the timeshare villas, and 28 of the timeshare condominiums (35.5 percent of total units). Exhibit 6B, Project Trip Generation Phase 2, of the Hatch Mott MacDonald report dated March 17, 2017, presents the cumulative trip generation for the first two phases. The net trip generation was projected to be 274 average daily trips at 100 percent occupancy and 192 average daily trips at 70 percent occupancy. This alternative would result in approximately 32.5 percent less traffic than would the proposed project.

The project, as designed, does not require mitigation as no potentially significant environmental impacts were identified. This 32.5 percent reduction in project trips would not change the levels of service but may affect the proposed improvements to Paraiso Springs Road. Two of the proposed off-site improvements along Paraiso Springs Road are proposed in conjunction with project Phases 3 and 4 and the County would decide, through discussions with the applicant and analysis of the traffic report, at the time of a decision to approve this alternative, whether those improvements would be needed without project phases 3 and 4.

Therefore, because the Reduced Project Alternative would reduce the generation of construction-related vehicle trips and long-term operational traffic, as well as require fewer parking spaces, this alternative would have fewer transportation and circulation impacts in comparison to the proposed project.

Conclusion

The smaller footprint and elimination of 64 hotel and timeshare units in the Reduced Project Alternative would result in fewer corresponding impacts to all environmental issue areas with the exception of impacts to Climate Change, which would have similar impacts to the proposed project. The Reduced Project Alternative would result in 28 fewer hotel units and 36 fewer timeshare units, which would reduce the room count by 124 rooms, and, therefore, would meet the proposed project objectives to a lesser degree compared to the proposed project. This alternative would not meet the project objectives to a greater degree compared to the proposed project and the other alternatives identified in this section. These objectives include development of 50 acres of the project site, providing an economically sustainable combination of hotel units and timeshare units of varying sizes, maximizing development of this previously disturbed site, reducing pressure on the conversion of other agricultural areas to provide tourist accommodations related to the Winery Corridor, and providing a world class spa-resort in the Central Salinas Valley.

5.2.5 Comparison of Alternatives

Pursuant to CEQA Guidelines section 15126.6(a), an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The significance of effects of the alternatives relative to the proposed project are summarized in Table 5-1, Comparison of Project Alternatives to the Proposed Project. Where the proposed project has no impact relative to a particular environmental topic, that effect is not included in the table. For informational purposes, less than significant impacts of the proposed project are included in the table, as in some cases, project alternatives have potential to reduce even less than significant environmental effects; this information is considered to be worth noting. As Section 15126.6(a) requires investigation of alternatives that avoid or substantially lessen the significant impacts of the proposed project, Table 5-1 focuses on whether an alternative has potential to avoid or substantially lessen potentially significant impacts or significant and unavoidable impacts of the proposed project. Where an alternative substantially lessens or avoids a significant or significant unavoidable impact of the proposed project, this is denoted in boldface font. None of the alternatives analyzed would lessen the only significant impact, Historical Resources, to a less than significant level.

5.2.6 Environmentally Superior Alternative

CEQA Guidelines requires an EIR to identify an "environmentally superior alternative" (Title 14 CCR §15126(e) (2)). If the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives.

All of the alternatives would have fewer environmental impacts relative to the proposed project, with the No Project Alternative having the fewest or no environmental impacts at all.

As identified in Table 5.1, the No Project Alternative is the environmentally superior alternative, as the project site would remain in its existing condition, thereby avoiding adverse and/or potentially adverse environmental impacts except cultural resources, which would remain Significant and Unavoidable, and perhaps not allow for any mitigation for the loss of historic resources.

As stated above, if the No Project Alternative is identified as the environmentally superior alternative, the EIR must also identify another environmentally superior alternative among the remaining alternatives. Based on this review, the Reduced Project Alternative (Alternative 4) is considered the environmentally superior alternative after the No Project Alternative. The reduced footprint, reduction in hotel and timeshare units, reduction in demand on infrastructure and public services, and increase in open space at the project site would correspondingly reduce the environmental impacts of the proposed project. For these reasons, the Reduced Project Alternative (Alternative 4) is the environmentally superior alternative.

Table 5-1Comparison of Project Alternatives to the Proposed Project

Environmental Impact	Proposed Project	Alternative #1 No Project	Alternative #2 Valley Floor Alternative One (Units Reduced by 10%)	Alternative #3 Valley Floor Alternative Two (Units Reduced by 6.7%)	Alternative #4 Reduced Project Alternative (Units Reduced by 35.5%)
Aesthetics and Visual Resou	irces				
3.1-1 Degradation of the existing visual character or quality of the project site and its surroundings	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced	Less than significant with mitigation Substantially reduced
3.1-2 New sources of light adversely affecting visual resources	Less than significant with standard condition of approval	No impact Avoids impact	Less than significant with standard condition of approval Reduced	Less than significant with standard condition of approval Reduced	Less than significant with standard condition of approval Substantially reduced
Air Quality		·	·		
3.2-1 Short-term construction emissions	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced	Less than significant with mitigation Substantially reduced
3.2-2 Potential exposure to asbestos and/or lead during demolition activities	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Similar	Less than significant with mitigation Similar	Less than significant with mitigation Similar
3.2-3 Long-term operational stationary and vehicular emissions	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Substantially reduced
3.2-4 Carbon Monoxide	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Reduced
3.2-5 Exposure to sensitive receptors to unpleasant odors	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Reduced
3.2-6 Exposure of sensitive receptors to toxic air contaminants	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Reduced

Environmental Impact	Proposed Project	Alternative #1 No Project	Alternative #2 Valley Floor Alternative One (Units Reduced by 10%)	Alternative #3 Valley Floor Alternative Two (Units Reduced by 6.7%)	Alternative #4 Reduced Project Alternative (Units Reduced by 35.5%)
Biological Resources		·		·	
3.3-1 Habitat loss for special status bat species, Monterey dusky-footed woodrat, coast horned lizard, and burrowing owl.	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Substantially reduced
3.3-2 Potential direct impact to special status bat species, Monterey dusky-footed woodrat, coast horned lizard, and burrowing owl.	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced	Less than significant with mitigation Substantially reduced
3.3-3 Potential direct impacts to nesting birds.	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced	Less than significant with mitigation Substantially reduced
3.3-4 Loss of potential jurisdictional wetland (0.40 acre, 7,771 linear feet).	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation	Less than significant with mitigation	Less than significant with mitigation
3.3-5 Impede wildlife movement	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Substantially reduced
3.3-6 Removal of approximately 8.8 acres of coast live oak woodland habitat and up to 191 trees, including 185 protected oak trees.	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced	Less than significant with mitigation Substantially reduced
Climate Change					
3.4-1 Generation of greenhouse gas emissions above net zero	No impact with applicant- proposed mitigation	No impact	No impact with applicant- proposed mitigation Similar	No impact with applicant- proposed mitigation Similar	No impact with applicant- proposed mitigation Similar

Environmental Impact	Proposed Project	Alternative #1 No Project	Alternative #2 Valley Floor Alternative One (Units Reduced by 10%)	Alternative #3 Valley Floor Alternative Two (Units Reduced by 6.7%)	Alternative #4 Reduced Project Alternative (Units Reduced by 35.5%)
Cultural Resources					
3.5-1 2003 demolition of nine significant historic Victorian-era cottages.	Significant and unavoidable, with mitigation	Significant and unavoidable, with no mitigation Greater Impact	Significant and unavoidable, with mitigation Similar	Significant and unavoidable, with mitigation Similar	Significant and unavoidable, with mitigation Similar
3.5-2 Potential to disturb, destroy, or adversely affect the integrity of recorded archaeological sites.	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Similar	Less than significant with mitigation Similar	Less than significant with mitigation Similar
3.5-3 Potential to disturb, destroy, or adversely affect the integrity of a significant archaeological resource (planned road improvements)	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Similar	Less than significant with mitigation Similar	Less than significant with mitigation Similar
3.5-4 Potential to disturb undiscovered archaeological resources or human remains	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Similar	Less than significant with mitigation Similar	Less than significant with mitigation Similar
Geology and Soils					
3.6-1 Seismic groundshaking potentially resulting in exposure of people to injury or death	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation	Less than significant with mitigation	Less than significant with mitigation Substantially reduced
3.6-2 Potential human safety hazards resulting from dynamic compaction	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation	Less than significant with mitigation	Less than significant with mitigation Substantially reduced
3.6-3 Potential human safety hazards from liquefaction and/or lateral spreading	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation	Less than significant with mitigation	Less than significant with mitigation Substantially reduced

Environmental Impact	Proposed Project	Alternative #1 No Project	Alternative #2 Valley Floor Alternative One (Units Reduced by 10%)	Alternative #3 Valley Floor Alternative Two (Units Reduced by 6.7%)	Alternative #4 Reduced Project Alternative (Units Reduced by 35.5%)
3.6-4 Potential human safety hazards from potential landslides.	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Substantially reduced	Less than significant with mitigation Substantially reduced	Less than significant with mitigation Substantially reduced
3.6-5 Short-term and long- term erosion with the potential to adversely affect water quality	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Similar	Less than significant with mitigation Similar	Less than significant with mitigation Substantially reduced
3.6-6 Project site has a low potential for expansive soils	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Similar	Less than significant with mitigation Similar	Less than significant with mitigation Substantially reduced
Hazards and Hazardous Mat	erials				
3.7-1 Use of hazardous materials during project operations	Less than significant	No impact Avoids impact	Less than significant Similar	Less than significant Similar	Less than significant Substantially reduced
3.7-2 Transport, use, or disposal of hazardous materials during construction activities	Less than significant	No impact Avoids impact	Less than significant Similar	Less than significant Similar	Less than significant Similar
3.7-3 Possible release of asbestos, lead, and/or PCBs from the fluorescent lighting ballasts within the existing structures	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Similar	Less than significant with mitigation Similar	Less than significant with mitigation Similar
3.7-4 Possible exposure of people or property to hazardous materials associated with septic systems abandonment	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Similar	Less than significant with mitigation Similar	Less than significant with mitigation Similar

Environmental Impact	Proposed Project	Alternative #1 No Project	Alternative #2 Valley Floor Alternative One (Units Reduced by 10%)	Alternative #3 Valley Floor Alternative Two (Units Reduced by 6.7%)	Alternative #4 Reduced Project Alternative (Units Reduced by 35.5%)
3.7-5 Possible release of hazardous materials in the soil during construction activities	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Similar	Less than significant with mitigation Similar	Less than significant with mitigation Similar
3.7-6 Potential for wildfire hazards	Less than significant	No impact Avoids impact	Less than significant Similar	Less than significant Similar	Less than significant Similar
Hydrology and Water Qualit	y		·		
3.8-1 Short-term Erosion and Water Quality	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced
3.8-2 Long-term Surface Water Runoff	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced
3.8-3 Long-term Surface Water Quality	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced
3.8-4 Long-term Water Supply	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Reduced
3.8-5 Effect on Salinas Valley Groundwater Levels	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Reduced
3.8-6 Well Interference	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Reduced
3.8-7 Potential Spring Impact	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Reduced
3.8-8 Groundwater Quality	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced

Environmental Impact	Proposed Project	Alternative #1 No Project	Alternative #2 Valley Floor Alternative One (Units Reduced by 10%)	Alternative #3 Valley Floor Alternative Two (Units Reduced by 6.7%)	Alternative #4 Reduced Project Alternative (Units Reduced by 35.5%)
3.8-9 Wetland and Riparian Impact	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced
Noise					
3.10-1 Ground borne vibrations	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Reduced
3.10-2 Traffic noise at residences along Paraiso Springs Road	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Reduced
3.10-3 Non-traffic noise from project operations at residences along Paraiso Springs Road	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Similar	Less than significant with mitigation Similar	Less than significant with mitigation Similar
3.10-4 Short-term construction noise	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Reduced	Less than significant with mitigation Reduced	Less than significant with mitigation Substantially reduced
Public Services and Utilities					
3.11-1 Increase wastewater flows and construction of treatment, distribution, and disposal facilities	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Substantially reduced
3.11-2 Water exceeds public health standards for fluoride	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation Similar	Less than significant with mitigation Similar	Less than significant with mitigation Similar
3.11-3 Possible construction of new or expanded storm water detention facilities	Less than significant with mitigation	No impact Avoids impact	Less than significant with mitigation	Less than significant with mitigation	Less than significant with mitigation Substantially reduced

Environmental Impact	Proposed Project	Alternative #1 No Project	Alternative #2 Valley Floor Alternative One (Units Reduced by 10%)	Alternative #3 Valley Floor Alternative Two (Units Reduced by 6.7%)	Alternative #4 Reduced Project Alternative (Units Reduced by 35.5%)
3.11-4 Increase in solid waste generation disposed of in landfill	Less than significant	No impact Avoids impact	Less than significant	Less than significant	Less than significant Substantially reduced
Transportation and Traffic					
3.12-1 Added vehicle trips to the vicinity roadway system	Less than significant	No impact Avoids impact	Less than significant Reduced	Less than significant Reduced	Less than significant Reduced
3.12-2 Roadway hazards	Less than significant	No impact Avoids impact	Less than significant Similar	Less than significant Similar	Less than significant Similar
Consistency with Project Objectives	Meets the project objectives	Does not meet the project objectives	Meets the project objectives, but to a lesser degree	Meets the project objectives but to a lesser degree	Meets the project objectives but to a lesser degree

SOURCE: EMC Planning Group 2017

NOTE: Avoids Impact = Impact is avoided Similar = Impact is same or similar to the project impact Reduced = Impact is less than the project impact Substantially reduced = Impact is substantially less than the project impact

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