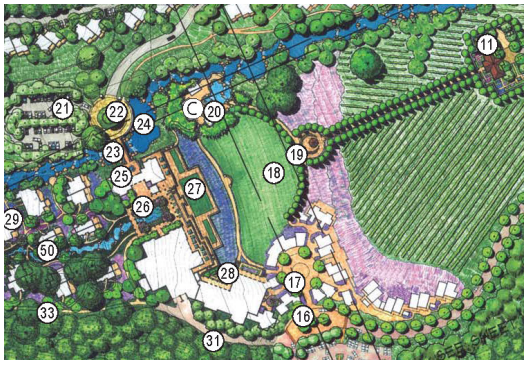
Recirculated Draft Environmental Impact Report

Paraiso Springs Resort

State Clearinghouse #2005061016

June 2019



2019 Recirculated Draft Environmental Impact Report

Paraiso Springs Resort

SCH# 2005061016

PREPARED BY

County of Monterey

Resources Management Agency

1441 Schilling Place, Second Floor

Salinas, CA 93901

Tel: 831.755.5176

Mike Novo, Management Specialist

novom@co.monterey.ca.us

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1. INTRODUCTION

1.1 AUTHORIZATION AND PURPOSE

This document is a second Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) for the proposed Paraiso Springs Resort Development (hereinafter "proposed project"), prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). This Recirculated Draft EIR (or 2019 RDEIR) has been prepared by Monterey County (County of Monterey) as the "Lead Agency," in consultation with the appropriate local, regional, and state agencies. The purpose of the EIR is to inform the public and various government agencies of the environmental effects/impacts of the project, identify possible ways to minimize the significant effects, and describe reasonable alternatives that support the objectives of the project. As defined by CEQA Guidelines Section 15382, "significant effect on the environment" means "...a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether a physical change is significant."

1.2 EIR PROCESS

On June 30, 2005, the County of Monterey prepared a proposed Mitigated Negative Declaration (MND) for a Demolition Permit to clear Code Violations resulting from the un-permitted demolition of nine Victorian cottages on the project site (the MND is included in Appendix A). The initial study attached to the MND identified that the project applicant had been in contact with the County about a resort development on the subject site. Among the public comments received during the 30-day review period (concluding July 5, 2005) was a letter from the State Historic Preservation Office (SHPO) stating that the loss of the nine Victorians was a significant impact under CEQA and that the whole of the action needed to include the removal of the Victorian Structures and the proposed resort. County staff determined that the removal of the nine Victorian cottages was a potentially significant adverse environmental effect, as defined by the California Environmental Quality Act (CEQA) Guidelines section 15064. CEQA Guidelines require preparation of an EIR when a Lead Agency determines that there is evidence that a project may have a significant effect on the environment. The applicant then submitted an application for the resort project that is being evaluated in this EIR (2018 RDEIR and 2019 RDEIR, as explained below). Therefore the "project" includes both the "after-the-fact" demolition permit and the resort construction.

A Draft EIR (DEIR) was prepared to inform the public of the potentially significant environmental effects of the proposed project, identify possible ways to minimize the significant effects, and describe a reasonable range of project alternatives. The County of Monterey notified all responsible and trustee agencies, interested groups, and individuals that an EIR was required for the proposed project. The County of Monterey used the following methods to solicit input during the preparation of the DEIR:

- A Notice of Preparation (NOP) was filed with the State Clearinghouse on May 29, 2008 for a 30-day review period, which concluded on June 27, 2008. The California State Clearinghouse assigned a State Clearinghouse Number of 2005061016.
- In addition to state agency distribution through the Clearinghouse and in accordance with the requirements of CEQA, Monterey County, acting through the Monterey County Planning Department, circulated the NOP from May 29, 2008 to June 27, 2008 for the required 30-day review period to responsible and trustee agencies, as well as interested groups, organizations, and individuals.
- The County of Monterey also conducted a public scoping meeting on December 13, 2007 to solicit input on the EIR. All comments received were considered during the preparation of this DEIR. The NOP and comments received in response to the NOP are presented in Appendix A.

The DEIR was circulated for public comment between July 15, 2013, and October 4, 2013. Monterey County received 29 comment letters. After the close of the public comment period, Monterey County Planning Department staff determined it was necessary to add significant new information to the Draft EIR, specifically to the aesthetics and visual resources, biological resources, cultural and historic resources, hydrology and water quality, and noise sections of the Draft EIR, as well as to evaluate an additional alternative to the proposed project.

In 2018, a Recirculated Draft EIR (RDEIR) was prepared to inform the public of the potentially significant environmental effects of the proposed project, identify possible ways to minimize the significant effects, and describe a reasonable range of project alternatives. The County of Monterey notified all responsible and trustee agencies, interested groups, and individuals that an EIR was required for the proposed project. The RDEIR fully superseded the 2013 DEIR.

The RDEIR was circulated for public comment between February 28, 2018, and April 26, 2018. Monterey County received 18 comment letters. After the close of the public comment period, Monterey County Planning staff prepared a Final EIR. Pursuant to comments received prior to certification of the Final EIR, Monterey County staff determined it was necessary to add significant new information to the 2018 Recirculated Draft EIR, specifically to the aesthetics and visual resources and to the hazards and hazardous materials sections of the RDEIR, as well as to evaluate an additional alternative to the proposed project.

This 2019 RDEIR will be circulated for agency and public review during a minimum 30-day public review period (see public comment instructions, below). This shortened review period was authorized by the State of California pursuant to CEQA Guidelines section 15105(d). The 2018 RDEIR remains in effect except as specifically superseded by the 2019 RDEIR, pursuant to CEQA Guidelines section 15088.5(c), which allows recirculation of “portions of the EIR.”

Comments received by the County on the 2019 RDEIR will be reviewed and responses to comments will be provided in the Final EIR (FEIR). Written responses to comments will be sent to those public agencies that provided timely comments on the 2019 RDEIR at

least 10 days prior to the certification hearing, when the County will consider whether or not to certify the FEIR and approve the proposed project.

The County, as Lead Agency, will review and consider the EIR (RDEIR, 2019 RDEIR and FEIR). If the County finds that the EIR reflects the County's independent judgment and has been prepared in accordance with CEQA and the CEQA Guidelines, the County will certify the adequacy and completeness of the EIR. Although the EIR does not control the Lead Agency's ultimate decision on the project, the County must consider the information and each significant effect identified in the EIR. A decision to approve the project would be accompanied by written findings prepared in accordance with CEQA Guidelines Section 15091, and if applicable, Section 15093. For each significant effect identified in the EIR, the findings will describe whether it can be reduced to a less than significant level through feasible mitigation measures, or if not, why there are no feasible mitigation measures or alternatives to reduce the effect to a less than significant level. No aspect of the proposed project will be approved until after the EIR is certified as adequate.

State law requires that a public agency adopt a monitoring program for mitigation measures that have been incorporated into the approved project to reduce or avoid significant effects on the environment. The Mitigation Monitoring and Reporting Program (MMRP), as required by Section 15097 of the CEQA Guidelines, describes how each of the mitigation measures will be implemented and provides a mechanism for monitoring and/or reporting on their implementation. The purpose of the MMRP is to ensure compliance with environmental mitigation during project implementation and operation. A monitoring program will be included in the FEIR.

If the lead agency approves the project with associated significant effects on the environment that cannot be feasibly avoided or reduced to less than significant levels, the County must adopt a Statement of Overriding Considerations that explain how the benefits of the project outweigh the significant unavoidable environmental effects, in accordance with Section 15093 of the CEQA Guidelines.

1.3 PUBLIC COMMENT INSTRUCTIONS

This 2019 RDEIR has been distributed to the State Clearinghouse, appropriate federal agencies, responsible and trustee agencies, other affected agencies, nearby cities, and interested parties, as well as all parties requesting a copy of the RDEIR in accordance with Public Resources Code 21092(b). The Notice of Completion of the 2019 RDEIR has also been distributed as required by CEQA. During the public review period, the 2019 RDEIR, including the technical appendices, is available for review at the County of Monterey Resource Management Agency – Planning.

Pursuant to CEQA Guidelines section 15088.5(f)(2), Monterey County is requesting that reviewers limit their comments to the revised portions of the 2019 RDEIR. All written comments on the 2019 Recirculated Draft EIR should be addressed to:

County of Monterey Resource Management Agency - Planning
Attn: Mike Novo
1441 Schilling Place, 2nd Floor

Salinas, CA 93901
(831) 755-5176

The County of Monterey welcomes your comments during the public review period. Comments may be submitted in hard copy to the name and address above. The County also accepts comments via e-mail or facsimile but requests that you follow these instructions to ensure that the Planning Department has received your comments.

To submit your comments by e-mail, please send a complete document including all attachments to: ceqacomments@co.monterey.ca.us. An e-mailed document should contain the name of the person or entity submitting the comments and contact information such as phone number, mailing address and/or e-mail address and include any and all attachments referenced in the e-mail. To ensure a complete and accurate record, we request that you also provide a follow-up hard copy to the name and address listed above. If you do not wish to send a follow-up hard copy, then please send a second e-mail requesting confirmation of receipt of comments with enough information to confirm that the entire document was received. If you do not receive e-mail confirmation of receipt of comments, then please submit a hard copy of your comments to ensure inclusion in the environmental record or contact the Planning Department to ensure your comments were received.

Facsimile (fax) copies will be accepted with a cover page describing the extent (e.g. number of pages) being transmitted. A faxed document must contain a signature and all attachments referenced therein. Faxed documents should be sent to the contact noted above at (831) 757-9516. To ensure a complete and accurate record, we request that you also provide a follow-up hard copy to the name and address listed above. If you do not wish to send a follow-up hard copy, then please contact the Planning Department to confirm that the entire document was received.

1.4 ORGANIZATION OF THE 2019 RECIRCULATED DRAFT EIR

This 2019 RDEIR consists of five sections: Introduction, Miscellaneous Edits, Aesthetics and Visual Resources Chapter, Hazards and Hazardous Materials sections, and Alternatives sections, plus a set of appendices.

- Introduction provides an overview of the organization of the EIR and processes involved in preparation and review of the 2019 RDEIR. Background information regarding the project planning process and coordinated planning process is included as well.
- The Aesthetics and Visual Resources Chapter, and the Hazards and Hazardous Materials sections include modifications to the 2018 RDEIR. These sections describe the Environmental Setting, Impacts, and Mitigation Measures, including in depth analysis of the project's environmental impacts for these topics. Analysis is provided for all environmental factors listed in CEQA Appendix G environmental checklist. A detailed description of this section's organization and contents is included in the 2018 RDEIR introduction to Section 3.0: Environmental Setting, Impacts, and Mitigation Measures.
- A new project alternative is added to the 2018 RDEIR Alternatives section (Chapter 5) and contains a discussion of this new alternative to the proposed

project. Modifications to the 2018 RDEIR to incorporate this new alternative are also included.

- The Miscellaneous Edits section includes edits to other sections of the 2018 RDEIR to reflect the changes from this 2019 RDEIR and provide internal consistency.
- Appendices include the original 2005 General Development Plan, a 2019 Fire Protection Plan prepared by the applicant's consultant (Dudek), and technical information relating to lighting impacts, provided by Michael Baker International under contract to the County of Monterey.

1.5 AGENCIES CONTACTED

This 2019 RDEIR was prepared in consultation with CalFire and Mission-Soledad Rural Fire Protection District: Chief David Fulcher and John Owens, as well as the California Board of Forestry and Fire Protection: Edith Hannigan, Land Use Program Manager, and Matt Dias, Executive Officer.

Miscellaneous Edits

1. RDEIR Executive Summary Section, Project Alternatives, is modified to add a new alternative:

Alternative #5 – Timeshare Relocation Alternative

2. RDEIR Executive Summary Section, Summary of Project Environmental Impacts and Mitigation Measures, Table ES.1, is modified to replace Mitigation Measure 3.1-1 with the revised mitigation measure identified in this 2019 RDEIR.

MM 3.1-1 Prior to issuance of any construction permits, the project applicant shall modify the project landscape design and colors for the exterior roof and plaster walls as follows:

- The roof color shall include a blend of darker shades, which colors would serve to blend the building's rooftops into the natural environment and reduce the appearance of large masses from greater distances. Final design shall be subject to review and approval of the RMA Director.
- The color of the plaster shall utilize a variety of earth tone colors, such as the color supplied in the palette on page 2 in Exhibit 1 of the RMA Analysis, and as otherwise approved by the RMA Director.
- The Landscape Plan shall include the use of five-gallon size or transplanted native oak trees, or other tree or tall shrub species as approved by RMA-Planning, planted, when mature, to break up the building rooflines and the front of the resort when viewed from common public viewing areas in the Salinas Valley, while allowing well-designed openings in the canopy to allow views from the resort of the valley. Oak trees shall be provided in appropriate areas, such as where oak trees were originally present prior to grading in that area, or on the north side of buildings where no oak woodland was present prior to grading. Where oak trees were not part of the original landscape for that area of the site, other tree species shall be used.
- Where buildings are placed in areas that previously consisted of dense oak woodlands, the design of the landscaping shall integrate the buildings into the oak woodland setting such that the buildings, if visible, are viewed in the context of the oak woodland. Native oak trees shall be strategically placed at building corners and extending between buildings and natural landforms or remaining native oak trees to integrate the buildings into the natural landscape. Landscape Plans shall be submitted for review and

approval by the RMA Director of Planning for each phase of development and shall be approved prior to issuance of construction permits for buildings within the area covered by the Landscape Plan. Review by the County of the landscape plans will be conducted in consultation with the fire district to ensure that landscaping is installed in a fire-safe manner.

The intent of this mitigation measure is to occasionally break up the mass, not screen the site from the valley or from public views, and to use color and vegetation to break up the visual massing from common public viewing areas. This can be achieved by using existing topography, landscape plantings, and a variety of colors to create variety in the mass. The landscape plantings, while further reducing visibility, will not be fully grown at the time of planting. The mitigation measure's other techniques, as well as existing topography and vegetation that will not be disturbed, will reduce the impact to a less than significant level even while the newly planted vegetation grows to maturity, due to the distance to common public viewing areas. Oak trees can be a planted a distance away from structures and each other, to comply with safe fire-planting principles, and still provide screening from public viewing areas.

3. RDEIR Executive Summary Section, Summary of Project Environmental Impacts and Mitigation Measures, Table ES.1, is modified to replace the information related to Impact 3.7-6 with the information relating to Impacts 3.7-6 through 3.7-9 (see next pages):

Project Impacts	Level of Significance Without Mitigation	Mitigation Measure(s)	Resulting Level of Significance
Impact 3.7-6: Implementation of the proposed project will not affect an emergency response plan or emergency evacuation plan. However, project implementation may impact emergency response and evacuation efforts.	Potentially Significant	**MM 3.7-6a** The Fire Protection Plan shall be subject to review by the Mission Soledad Rural Fire Protection District, and approval by the RMA Director, prior to clearance of any vegetation or issuance of permits for construction, whichever occurs first. The applicant shall implement the approved Fire Protection Plan. The Fire Protection Plan shall include the following or equivalent measures, as determined through the approval process: • Provide a facility Fire Safety Coordinator(s) to oversee implementation of fire protection and safety and overall fire coordination with MSRFPD/CAL FIRE • Coordinate an annual fire evacuation drill/fire exercise to ensure proper safety measures have been implemented, facility awareness and preparation of facility-wide “Ready, Set, Go!” plan, consistent with the Monterey County Community Wildfire Protection Plan. • Provide trained security staff 24/7, 365 days per year at the guard gate who are trained to manage an evacuation of the facility by opening the gates and directing traffic out of the area. • Provide a first-responder	Less than Significant

Project Impacts	Level of Significance Without Mitigation	Mitigation Measure(s)	Resulting Level of Significance
		(EMT) level staff person and equipment to be on-site at all times. • Provide a customized one-ton, 4x4 pickup with a skid mounted pump and up to 150 gallon water tank. Multiple staff members and the site security staff should be trained to utilize this apparatus for the purposes of providing initial suppression for any vegetation ignitions, and initial response to other fires. • Designate one or more structures to house the projected population and to include additional hardening to be designated a temporary refuge area (TRA). • Provide ember-resistant vents for all ventilation for project structures. • Provide a site-wide Public Address (PA)/Intercom system for emergency notifications. • Prepare and practice site-wide evacuations following the "Ready, Set, Go!" program guidelines. • Prepare an Emergency Preparation Plan that considers pre-fire planning, post-fire recovery, reporting, training, prevention, and communications procedures, • Enhance traffic flow by not constructing speed	

Project Impacts	Level of Significance Without Mitigation	Mitigation Measure(s)	Resulting Level of Significance
		bumps/humps and provide an automatic opening device for fire and law enforcement at the entrance gate. • Restrict vegetation around temporary refuge area buildings to highly ignition resistant vegetation planted at low densities and maintained free of all accumulated debris/litter. • Design and implement a landscaping plan consistent with accepted wildland urban interface fire safe/fire adapted practices. • If planted, manage the vineyard in an irrigated, maintained condition to act as a modified fuel buffer. • Conduct an annual inspection of the site by MSRFPD or its designee to ensure that project landscaping is maintained in a wildfire-safe condition. • Maintain a 1- to 3-foot landscape-free area adjacent to all building structures' foundations to prevent available fuels for embers at the building base. **MM 3.7-6b** Implement and maintain fuel treatment areas along project roads. Fuel treatment areas shall measure 20 feet in width (horizontal) as measured from the edge of the paved surface and shall occur on both sides of the road.	

Project Impacts	Level of Significance Without Mitigation	Mitigation Measure(s)	Resulting Level of Significance
		Maintenance of roadside treatment areas shall be conducted according to the standards outlined in Monterey County Code Chapter 18.09 (Fire Code), Section O109.1.	
Impact 3.7-7: Implementation of the proposed project may exacerbate wildfire risk.	Potentially Significant	**MM 3.7-7a** Implement all construction-phase fuel modification components from the approved Construction Fire Prevention Plan (see MM 3.7-7b) prior to removal of vegetation or combustible building materials being delivered to the site, as applicable. **MM 3.7-7b** The applicant shall develop a Construction Fire Prevention Plan that addresses training of construction personnel and provides details of fire-suppression procedures and equipment to be used during construction. The Construction Fire Prevention Plan shall be subject to review by the Mission Soledad Rural Fire Protection District, and approval by the RMA Director, prior to clearance of any vegetation or issuance of permits for construction, whichever occurs first. Information contained in the plan shall be included as part of project-related environmental awareness training. At minimum, the plan shall include the following or equivalent measures: • Procedures for minimizing potential ignition,	Less than Significant

Project Impacts	Level of Significance Without Mitigation	Mitigation Measure(s)	Resulting Level of Significance
		including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, use of spark arrestors, and hot work restrictions; • Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days; • Adequate water supply to service construction activities; • Fire coordinator role and responsibility; • Worker training for fire prevention, initial attack firefighting, and fire reporting; • Emergency communication, response, and reporting procedures; • Coordination with local fire agencies to facilitate agency access through the project site; • Emergency contact information; • Demonstrate compliance with applicable plans and policies established by state and local agencies. **MM 3.7-7c** Maintenance of project buildings, grounds, and infrastructure, including defensible space areas, shall be	

Project Impacts	Level of Significance Without Mitigation	Mitigation Measure(s)	Resulting Level of Significance
		conducted using firesafe practices to minimize the potential for wildfire ignitions resulting from equipment use. Firesafe practices shall be consistent with California Public Resources Code Sections 4427, 4428, 4431, and 4442. Infrastructure maintenance activities shall be ceased during periods of high fire hazard (e.g., red flag warnings), except where necessary to maintain water supply for fire suppression purposes. This requirement shall be included in the project's operational manual (MM 3.7-7d). **MM 3.7-7d** The applicant shall develop an Operations Fire Prevention Plan that addresses policies and procedures for minimizing wildfire potential. The Operations Fire Prevention Plan shall be subject to review by the Mission Soledad Rural Fire Protection District, and approval by the RMA Director, prior to issuance of occupancy permits or final inspection, whichever occurs first, for any habitable structures. The plan shall include the following: • Procedures for minimizing potential ignition during maintenance activities; • Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days; • Fuel modification zone and	

Project Impacts	Level of Significance Without Mitigation	Mitigation Measure(s)	Resulting Level of Significance
		landscape area maintenance procedures, including timing of work to reduce the likelihood of ignition and/or fire spread; • Communication and reporting procedures with MSRFPD; • Fire safety coordinator role and contact information; • Applicable recommendations included in the project's Fire Protection Plan (MM 3.7-6a).	
Impact 3.7-8: Implementation of the proposed project may exacerbate fire risk associated with installation and maintenance of project-related infrastructure.	Potentially Significant	With implementation of Mitigation Measures 3.7-6b and 3.7-7c, wildfire impacts resulting from installation and maintenance of project-related infrastructure would be less than significant.	Less than Significant
Impact 3.7-9: Implementation of the proposed project may increase risk associated with post-fire runoff, slope instability, or drainage changes.	Potentially Significant	**MM 3.7-9:** Following any wildfire that burns onto the project site, a post-fire field assessment shall be conducted by an engineering geologist within 60 days of fire personnel allowing access to the site, to identify any areas that may be subject to increased risk of post-fire flooding, landslide or erosion. Any recommendations identified by the geologist to mitigate such risk shall be reviewed and approved by Monterey County RMA and implemented by the project applicant. This requirement shall	Less than Significant

Project Impacts	Level of Significance Without Mitigation	Mitigation Measure(s)	Resulting Level of Significance
		be included in the project's operational manual.	

4. RDEIR Cumulative Section 4.5.2, Cumulative Impacts Assumptions and Analysis, Aesthetics, is modified to add the following information prior to the last sentence of this Aesthetics section:

A cumulative light and glare impact would occur if the proposed project, together with other projects located within the proposed project's area, would contribute to a cumulative increase in ambient nighttime light levels or glare generation in that area, as defined in RDEIR section 4.5.2 related to Aesthetics.

The project area includes lighting from residential and agricultural facilities (including wineries). The area does not include substantial lighting from these uses and only one currently proposed project, a residential care facility located within the Las Palmas Ranch project, and one approved project (Ferrini Ranch subdivision) is included in the area subject to the cumulative analysis. The Las Palmas community, which contains approximately 1000 residential units near Spreckels, is 18 miles north of the project site. Due to the distance, light emitting from this project near Soledad would not add cumulatively to light emissions from either area. Also, the Las Palmas Ranch project would also have to comply with the lighting standards controlling light pollution set forth in Title 24 and in county policies. The Ferrini Ranch project is even further away and is primarily located along the Highway 68 corridor (RDEIR page 4-6), on the north and west side of the Sierra de Salinas mountain range. Very little of that project is visible within the Sierra de Salinas foothills area, which is the area for consideration of the cumulative impact for aesthetics, including light and glare.

5. RDEIR Cumulative Section 4.5.2, Cumulative Impacts Assumptions and Analysis, Hazards and Hazardous Materials, is modified to add the following information prior to the last sentence of this Hazards and Hazardous Materials section:

No other significant development projects are proposed, or approved and not yet constructed, in the State Responsibility Area of the Sierra de Salinas mountain range. Potential cumulative impacts to exacerbating fire risk within the SRA are the same potential impacts of this project identified above.

3.1 AESTHETICS AND VISUAL RESOURCES

3.1.1 Introduction

This section describes the aesthetic and visual resource conditions at the project site and in the project vicinity, presents the regulatory framework applicable to the proposed project, and discusses the potential aesthetic impacts that could result from implementation of the proposed project. The primary aesthetic concerns associated with the proposed project are potential changes in aesthetic character of the project site, impacts to public viewsheds, and/or obstruction of existing views.

The project-specific information and analysis within this section is primarily based on project plans and site reconnaissance and photo documentation of the project site performed by RBF Consulting during the spring of 2007, and a subsequent site visit and documentation by EMC Planning Group in the fall of 2012. In addition, Monterey County Resource Management Agency (Monterey County RMA) performed a site reconnaissance on May 4, 2016 and prepared a visual analysis report, dated December 1, 2016 utilizing a view analysis prepared by HKS, Inc. (HKS) in June 2016. The Monterey County RMA report and supporting HKS visual analysis are included in 2018 RDEIR Appendix C.

3.1.2 Environmental Setting

Local Visual Resources

The project site consists of about 235 acres nestled in the mouth of a canyon extending westward into the foothills located at the western terminus of Paraiso Springs Road on the eastern slope of the Sierra de Salinas Foothills in the Salinas Valley, approximately seven miles west of the City of Greenfield. Elevations at the project site range from approximately 1,000 feet at the current entrance to the project site from Paraiso Springs Road to slightly over 2,400 feet along the ridgelines. Views from the project site consist of scenic ridgelines north, west, and south, and the expansive Salinas Valley to the east. Surrounding land uses currently consist of agricultural uses and grazing, as well as several single-family residences located along Paraiso Springs Road located east of the project site. The existing topography and vegetation screens the project site from these residential uses. The project site is visible on the approach from Paraiso Springs Road and is identifiable by several tall palm trees.

Existing development within the project site consists of 15 vernacular cabins located along the hillside, a changing room, a recreation room, indoor and outdoor baths, six mobile homes, a lodge, a workshop, a yurt compound[1], and several small outbuildings as shown in Figure 2-4, Parcel Boundary and Site Characteristics, presented earlier, which shows an aerial view of the site characteristics. Photographs of the project site are shown in Figures 2.5a and 2.5b, presented earlier.

As shown in Figure 3.1-1, Views of the Project Site, the project site is very secluded and is difficult to see from adjacent public roadways. Several residences are located below and to the east of the project site on Paraiso Springs Road.

The project site is comprised of areas that contain both native and non-native landscape plantings, including eucalyptus, palm trees, live oak woodland, Diablan sage scrub, baccharis scrub, wetlands, and annual grasslands. The tall palm trees on site are a visually distinctive feature that stands out within the foothills. On and surrounding the project site, the vegetation is typical to that of the California chaparral landscape, a semi-arid shrub dominated association of plants shaped by summer drought, winter rain and periodic wildfire.

[1] A yurt is a portable, covered, framed dwelling structure.

Sensitive Viewpoints

Areas of visual sensitivity are those areas that may be visible from long distances, for long durations of time from "common public viewing areas" which is defined in Monterey County Code section 21.06.195. Areas of visual sensitivity may include particularly distinctive or prominent landforms or vegetation, or they may represent sensitive juxtapositions of line, color, shape, and texture in their composition. Ridgelines, mountain faces, hillsides, open meadows, natural landmarks, and vegetation are visually prominent from Paraiso Springs Road immediately adjacent to the project site and within the project site itself.

According to the *Central Salinas Valley Area Plan* (Monterey County 1987), several of the roads and canyons within the plan area exhibit scenic qualities sufficient to warrant their designation as a scenic route or highway (page 61). While the Area Plan identifies this area as scenic, the property does not include a Visual Sensitivity overlay zoning district. The County's Scenic Highway System is composed of roads and highways that have been designated as either State Scenic Highways or County Scenic Routes. The Central Salinas Valley contains areas of inspiring natural landforms and bucolic rural settings that can be appreciated from many of its roads and highways. In recognition of the desirability to preserve these scenic corridors for future generations, the Scenic Highway Element of the 1982 *Monterey County General Plan* proposed that many scenic routes in the planning area be constructed or improved to meet the criteria of the Scenic Highway Program (page 61). One of the identified scenic routes in the project vicinity is Arroyo Seco Road, which extends more than 15 miles from U.S. Highway 101 (to the north and west of the project site) to Carmel Valley Road (southwest of the project site). The *Monterey County General Plan* indicated that Arroyo Seco Road to Carmel Valley Road and along Carmel Valley Road to its terminus at State Route 1 are proposed scenic routes that may become official scenic routes after proper study and certification (page 183). As shown on Figure 3.1-2, Scenic Highway Corridors and Visual Sensitivity Map, a section of Arroyo Seco Road is located approximately four miles west to southwest of project site. This section of Arroyo Seco Road has not been officially designated as a scenic roadway and the project site is not within a Visual Sensitivity Overlay Zoning District.

Photo 1: Looking west, view of the Sierra de Salinas foothills with the Paraiso Springs Rd. and the Site in the foreground.

Photo 2: Looking southeast, view of the Site and the Sierra de Salinas foothills to the north and south. Salinas Valley shown in the distance.

Source: RBF Consulting 2007

Figure 3.1-1

Views of the Project Site

Paraiso Springs Resort EIR

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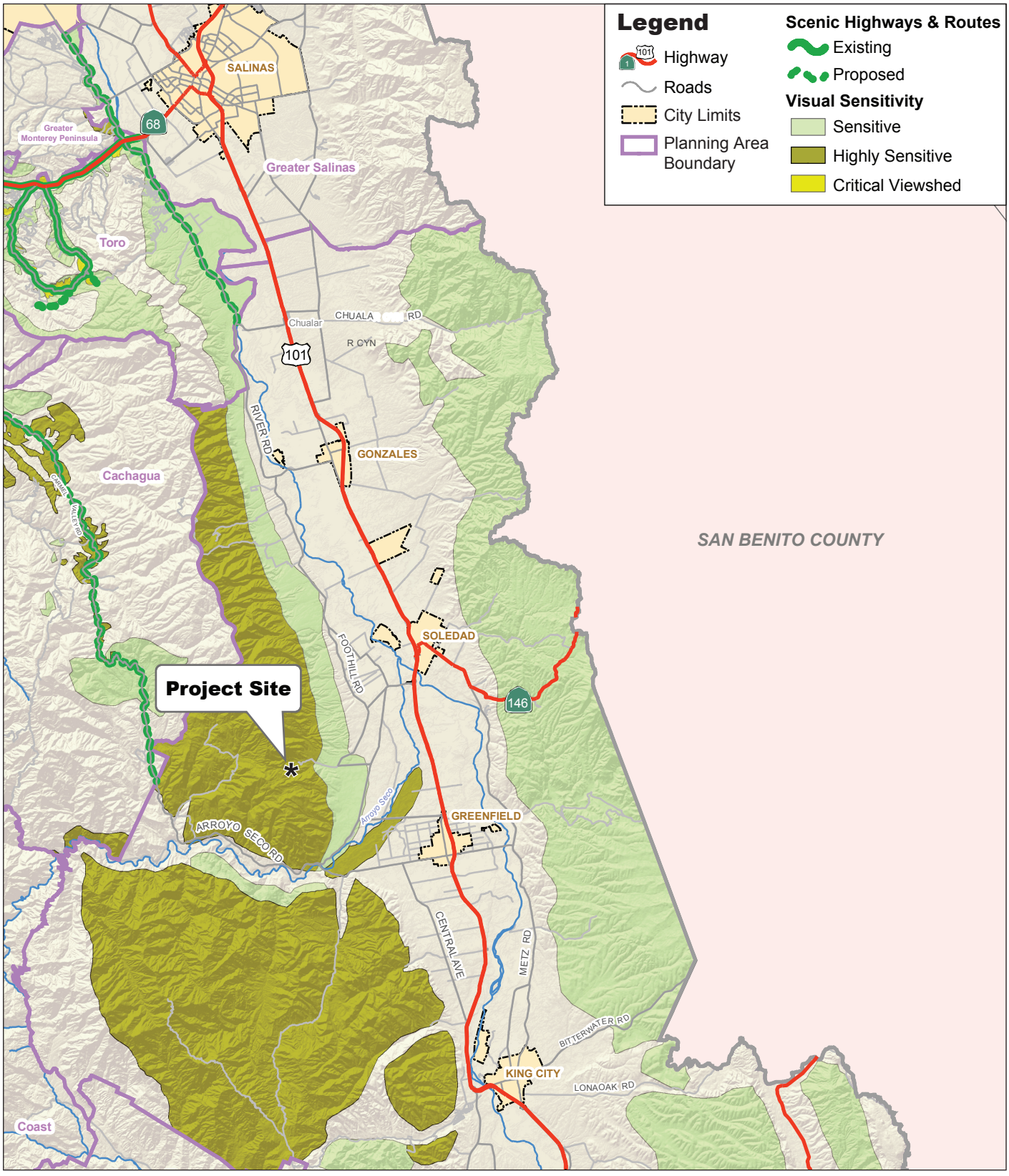

Source: Monterey County 1987

Figure 3.1-2

Scenic Highway Corridors and Visual Sensitivity Map

Paraiso Springs Resort EIR

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Note: The terms Light, Light Pollution, and Glare used in this chapter and listed below are defined in Attachment 1 to a memorandum prepared by a County consultant, Michael Baker International. The consultant also provided technical information for use in the project EIR (Michael Baker International, Memo to Monterey County Planning, February 13, 2019, 2019 RDEIR Appendix 3).

Terminology

a. Light

"light" refers to light emissions, or the degree of brightness, generated by a given source. Artificial lighting may be generated by point sources - focused points of origin representing unshielded light sources - or by indirectly illuminated sources of reflected light. Light may be directed downward to illuminate an area or surface; cast upward into the sky by an unshielded fixture and refracted (dispersed) by atmospheric conditions (sky glow); or cast sideways and outwards onto off-site properties (light trespass or overspill).

Sky glow and light trespass are considered forms of light pollution, which encompasses any adverse impacts of artificial lighting.

b. Light Pollution

The International Dark Sky Association defines light pollution as, "Any adverse effect of artificial light." They explain that light pollution includes light trespass, sky glow, and glare, with secondary effects including decreased nighttime visibility and energy waste.

c. Glare

The International Dark Sky Association defines glare as "Intense and blinding light that reduces visibility. A light within the field of vision that is brighter than the brightness to which the eyes are adapted" (http://darksky.org/our-work/resources/glossary/). Glare is focused, intense light directly emanated by a source or indirectly reflected by a surface from a source. The absolute measurement of light intensity on a given surface is objective, but human perception of that light intensity as a source of actual glare is dependent on the size, position, distance, and degree of visibility of a source from a given vantage point; the number of sources in a given area; and the luminance, or light levels, to which the eye of the beholder is adapted.

Glare is generally experienced as visual discomfort caused by high contrast in brightness levels in a given environment, or it may cause actual disability, such as a reduction in motorists' ability to see or identify objects. Daytime glare is typically caused by the reflection of sunlight from highly reflective surfaces at or above eye level. Reflective surfaces are generally associated with buildings clad with broad expanses of highly polished surfaces or with broad, light-colored areas of paving. Daytime glare is generally most pronounced during early morning and late afternoon hours when the sun is at a low angle and the potential exists for intense reflected light to interfere with vision and driving conditions. Daytime glare may also hinder outdoor activities conducted in surrounding land uses, such as sports.

Nighttime glare refers to direct, intense, focused light, as well as reflected light, and hampers visibility. Glare caused by direct sources of light generally originates from mobile and therefore transitory sources, such as automobiles. Nighttime glare may also originate from particularly intense stationary sources, such as floodlights. As with daytime sun glare, such intense light may cause undesirable interference with driving or other activities.

Existing Project Setting

The Project site is located approximately 130 miles south of San Francisco in the unincorporated central part of Monterey County in the western foothills of the Central Salinas Valley, approximately seven miles west of the City of Greenfield and the City of Soledad at the western terminus of Paraiso Springs Road. The project consists of about 50 acres of development area on a 235 acre property with development mostly located in the Paraiso Springs Valley and Indian Valley. The site is bordered to the east by grazing and farmland and to the north, south and west by the Santa Lucia Mountains. Land uses surrounding the Project site include single-family residences and agricultural operations to the east of the project on Paraiso Springs Road, with wineries and tasting rooms within a few miles of the site.

Some land uses are considered "light-sensitive receptors," including residences, natural areas, hotels, or hospitals, since minimal nighttime illumination levels may be essential to the proper function, use, or enjoyment of these uses. Sensitive receptors in the Project vicinity include single family residences on Paraiso Springs Road to the east of the Project site and natural areas (Michael Baker International, Memo to Monterey County Planning Department, Attachment 1, February 13, 2019). No street lighting exists along local roadways; however, cars, and trucks are a potential source of light and glare. The project vicinity is primarily rural residential and agricultural; therefore, there are very limited sources of light and glare.

The current nighttime illumination levels on the project site are consistent with rural residential use. Sources of nighttime lighting on the Project site include interior and exterior lighting from one mobile home occupied by the on-site property manager and one pole mounted light fixture about 20 feet high located near the occupied mobile home. Ancillary buildings on the property are only lighted during the rare times when in use in the evening. Vehicles arriving at and departing the property at night represent an additional source of light and, potentially, glare and is generally limited to ingress and egress of the caretaker's family (see RDEIR pages 2-2 and 4-6). Because of the site's location within a steep-sided valley and the general location of the mobile home near the center of the site, light on the site is currently only visible from certain vantages within the site itself and not able to be seen from any roadway offsite.

The residences east of the Project site on Paraiso Springs Road exhibit low nighttime light levels consistent with the mobile home occupied by the on-site manager. No street lighting exists along local roadways.

Existing Night Sky Brightness

Some lighting experts will measure night sky brightness using "The Bortle Scale." The County's consultant for lighting, Michael Baker International, describes the Bortle Scale in Attachment 1 to their memo. The Bortle Scale, in summary, is a nine-level numeric scale that measures the night sky's brightness of a particular location. The site is located within an area with a Bortle Scale value of approximately 3.5 (Benya Burnett Consultancy (April 23, 2018); Michael Baker International, Memo to Monterey County Planning, February 13, 2019). This Bortle value of 3.5 is consistent with the site's classification by the State of California as Lighting Zone 2, which is described in Section 3.1.3, State

Title 24 discussion, below (Michael Baker International, Memo to Monterey County Planning, February 13, 2019, 2019 RDEIR Appendix 3).

In summary, the project vicinity is primarily rural residential and agricultural; therefore, there are very limited sources of light and glare. The highest nighttime illumination levels are found approximately seven miles east of the Project site in the urban settings of Greenfield and Soledad, with the highest light pollution levels emanating from the two state prisons ("Correctional Facilities") in Soledad (https://cires.colorado.edu/Artificial-light). Portions of the city of Greenfield can be seen from the project site at night. Major fixed light sources associated with these cities are streetlights, residential, commercial and industrial developments, and schools and athletic facilities, which include parking lot lights, interior lights and decorative outdoor lights. Highway 101, east of the project site, is a major highway with two travel lanes in each direction and runs north and south. Headlights from traffic traveling the highway at night can be seen from portions of the project site at night. The existing night sky brightness on the project site as measured by the Bortle Scale is consistent with the State of California assigned Lighting Zone 2 for the project site.

3.1.3 Regulatory Background

State

Title 24, Part 6 (California Code of Regulations; 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings)

While the project is subject to the local requirements in effect when the application was determined "complete" as explained on page 2-1 of the RDEIR, the project must comply with the latest state code requirements, such as the building code, including State of California Title 24 described here.

Title 24 (California Code of Regulations) provides regulations to efficiently use lighting and save energy, including directing lighting to intended area, using occupancy sensors, multi-level lighting to provide efficient lighting levels, and mandatory and optional requirements to meet strict limitations as outlined in the regulation. All regulated, nonresidential buildings must be designed and built to comply with the mandatory measures of Title 24, Parts 6 and 11. In addition to meeting the mandatory requirements, buildings must also comply with additional requirements specified within the Energy Standards. The Energy Standards requirements for outdoor lighting apply to hardscape areas and designated landscape areas. This typically consists of the paved portions of an outdoor building site but may also include planters or other small areas of landscaping within the application area.

It is important to note that the standards in Title 24 were developed to ensure that new lighting introduced into an existing area would maintain the existing ambient light levels of the designated area thus eliminating any significant impacts related to light pollution either individually or cumulatively to the area. The exterior lighting portions of Title 24 are also heavily based on the Model Lighting Ordinance (MLO) created by the International Dark-Sky Association (IDA) and the Illuminating Engineering Society of North America (IESNA; https://www.ies.org/about/), groups which have a professional and technical interest in reducing light pollution, minimizing environmental impacts, and the technical expertise needed to provide viable lighting design.

Classification of Ambient Light Levels

Beginning with the 2005 Building Energy Efficiency Standards, the California Energy Commission adopted Outdoor Lighting Zone requirements that specified lighting power allowances based on project locations in the state and whether the surrounding environment is wild (dark), rural (characterized by low to moderate ambient light levels) or urban (characterized by higher ambient light

levels). The most recent requirements for lighting in California, Title 24, which is a very restrictive state code, took effect January 1, 2017. Lighting zones reflect the base (or ambient) light levels desired by a community. State designated lighting zones have been established for each area of the state. Table 10-114A of the California Code of Regulations, Title 24 Article 1, Section 10-114 specifies the relative ambient illumination level and the statewide default location for each lighting zone (Michael Baker International, Memo to Monterey County Planning, February 13, 2019).

Exterior lighting allowances in California vary by the established Lighting Zone (LZ). The regulations contain lighting power allowances for newly installed equipment and specific alterations that are dependent on the project site's assigned Lighting Zone. Lighting zone designations are public information, serve to quantify the existing project site ambient light conditions and are based on the latest (2010) U.S. Census Bureau data. They are designed to establish standards that limit light pollution and ensure light levels are appropriate for the purpose and the area. Descriptions of Lighting Zone 0, Lighting Zone 1, and Lighting Zone 2 are included in the Michael Baker International, Memo to Monterey County Planning, February 13, 2019 (Appendix 3). Lighting Zone 0 is applied to undeveloped areas of government-designated parks, recreation areas, and wildlife preserves. Lighting Zone 1 is applied to developed portions of government-designated parks, recreation areas, and wildlife preserves. Lighting Zone 2 is applied to rural areas, as defined by the 2010 U.S. Census (Michael Baker International, Memo to Monterey County Planning, February 13, 2019).

Lighting Zone 2 is the state default designation for rural areas, which is the designation for this site located in Census Tract 111.01 (Michael Baker International, Memo to Monterey County Planning Department, February 13, 2019; www.factfinder2.census.gov, Title 24 state website at http://energy.ca.gov/title24/2016standards/; Nonresidential Lighting and Electrical Power Distribution Guide, California Lighting Technology Center, UC Davis, 2016 https://cltc.ucdavis.edu/sites/default/files/files/publication/2016_Title24_Nonresidential_Lighting_Guide_170419_web_0.pdf; and Guide to the 2016 California Green Building Standards Code, California Building Standards Commission, 2017 https://www.documents.dgs.ca.gov/bsc/CALGreen/CALGreen-Guide-2016-FINAL.pdf). The project is required to comply with the lighting standards in Title 24 for this Lighting Zone designation.

The outdoor lighting requirements within Title 24 set minimum control requirements, maximum allowable power levels, minimum efficacy requirements and mandate outdoor lighting design parameters that must follow the Illuminating Engineering Society backlight, uplight and glare rating as defined in their technical memorandum TM-15-11 for controlling light pollution for all outdoor lighting systems based on the state assigned lighting zone (Michael Baker International, Memo to Monterey County Planning Department, February 13, 2019).

Title 24 non-residential lighting standards also have regulations for controlling indoor lighting. Hotel/motel guest rooms are covered by portions of both the non-residential indoor lighting requirements and the residential indoor lighting requirements. The primary mechanism for regulating indoor lighting under the standards is to limit the allowed lighting power, in watts, installed in the building. Other mechanisms require basic equipment efficiency and require that the lighting be controlled to permit efficient operation. These mechanisms are achieved utilizing controls that automatically turn off lighting when not needed for all conditioned and non-conditioned interior spaces (Michael Baker International, Memo to Monterey County Planning Department, February 13, 2019).

Monterey County General Plan

The applicable *Monterey County General Plan* was adopted by the Board of Supervisors in 1982. The following goals and policies in the General Plan are applicable to aesthetics and visual quality at the project site.

Goal 26 Promote appropriate and orderly growth and development while protecting desirable existing land uses.

Policy 7.2.1 Landowners and developers shall be encouraged to preserve the integrity of existing terrain and natural vegetation in visually sensitive areas such as hillsides and ridges.

Policy 26.1.1 The County, in coordination with the cities, shall manage the type, location, timing, and intensity of growth in the unincorporated area.

Policy 26.1.2 The County shall discourage premature and scattered development.

Policy 26.1.6 Development which preserves and enhances the County's scenic qualities shall be encouraged.

Policy 26.1.10 The County shall prohibit development on slopes greater than 30 percent. It is the general policy of the County to require dedication of a scenic easement on a slope of 30 percent or greater. Upon application, an exception to allow development on slopes of 30 percent or greater may be granted at a noticed public hearing by the approving authority for discretionary permits or by the Planning Commission for building and grading permits. The exception may be granted if one or both of the following findings are made, based upon substantial evidence:

A) There is no alternative which would allow development to occur on slopes of less than 30 percent; or

B) The proposed development better achieves the resource protection objectives and policies contained in the Monterey County General Plan, accompanying Area Plans and Land Use Plans, and all applicable master plans.

Policy 26.1.20 All exterior lighting shall be unobtrusive and constructed or located so that only the intended area is illuminated, long range visibility is reduced, and off-site glare is fully controlled.

Central Salinas Valley Area Plan

The *Central Salinas Valley Area Plan* (Monterey County 1987*)* contains the following policies applicable to the proposed project:

Policy 26.1.6.1 (CSV) Development shall have appropriate review where it is permitted in sensitive or highly sensitive areas as shown on the Scenic Highways and Visual Sensitivity Map.

Policy 40.1.2 (CSV) The County shall pursue measures to obtain official Scenic Road designation for Highway 146 and 25, Arroyo Seco Road, Bitterwater Road, and Elm Avenue

Monterey County Code

Monterey County Code Section 21.64.260 provides regulations for the protection of oak and other specific types of trees as required by the Monterey County General Plan, area plans, and master plans. Native oak trees six inches in diameter when measured two feet above the ground are protected under

these regulations. Oaks which are 24 inches or greater in diameter are considered "landmark trees" and are afforded additional protection measures.

Monterey County Code Section 21.64.230 provides a process for considering, and standards for, development on slopes of thirty (30) percent or greater. The regulations provide a permit process that allows the County to consider whether to allow development on slopes at or greater than 30% and two criteria, either of which must be met, to allow development to occur on these slopes. If one of the criteria cannot be met as determined through a public hearing process, the proposed development cannot occur on the steeper slopes.

Monterey County Code Section 21.66.10 provides regulations for development to determine if it will not create a substantially adverse visual impact when viewed from a common public viewing area. This project does not meet the definition for ridgeline development, which is defined in MCC Section 21.06.950 as follows: "Ridgeline development means development on the crest of a hill which has the potential to create a silhouette or other substantially adverse impact when viewed from a common public viewing area."

Substantial adverse visual impact is defined in MCC section 21.06.1275 as follows: "Substantial adverse visual impact means a visual impact which, considering the condition of the existing viewshed, the proximity and duration of view when observed with normal unaided vision, causes an existing visual experience to be materially degraded."

Monterey County Standard Conditions of Approval for Lighting Control

The County has been controlling the off-site effects of lighting since at least 1982, when the County General Plan included the following policy:

> *Policy 26.1.20: All exterior lighting shall be unobtrusive and constructed or located so that only the intended area is illuminated, long range visibility is reduced, and off-site glare is fully controlled.* (RDEIR page 3-10, pages 3-14 through 3-25, page 3-264 and page 4-6)

To implement this policy, the County applies standard conditions to control the type, intensity and location of lighting to ensure that fixtures illuminate only the intended area and to control lighting in a manner that off-site property and the night sky are not adversely affected by a project. In visually sensitive areas, a more restrictive standard condition is imposed that requires that the lighting source (bulb) is not visible from the area being protected from light pollution. Screening of the light source substantially reduces intrusion of any lighting effects on areas on and off the site.

The County's extensive experience over more than 35 years includes areas of Big Sur, where the County requires that development cannot be seen from Highway 1 and other specified areas. The County developed and applies a more restrictive standard condition for visually sensitive areas, such as Big Sur. Because the Paraiso Springs Resort property is identified as being within a visually sensitive area (RDEIR Section 3.1.2), this more restrictive condition of approval would be applied for this project. The visual sensitivity standards of this area, as opposed to County requirements in Big Sur, allow development to be seen from common public viewing areas. However, lighting would be strictly controlled through the condition of approval to illuminate only the intended area and control the visibility of the light source, which would minimize off-site impacts of project lighting. In accordance with County regulations and policies, the resort is allowed to, and will, be seen from offsite. .

In 2016, the County adopted design guidelines related to lighting (MCC Title 21, Chapter 21.63, and Board of Supervisors Resolution No. 16-010). The guidelines include forms of acceptable lighting, mostly related to shielding and directing lighting to the intended area and an effort to reduce off-site effects from lighting, including protecting the night sky from light pollution.

3.1.4 Analytical Methodology and Significance Threshold Criteria

Methodology

Aesthetics, as addressed in CEQA, refers to visual considerations. Aesthetics (or visual resource) analysis is a process to logically assess visible change and anticipated viewer response to that change. A common methodology for conducting visual analysis has been developed by the Federal Highway Administration, United States Department of Agriculture Forest Service, and the U.S. Soil Conservation Service. The County adapted the techniques and similar principles for this assessment.

As an initial step, such analysis begins with the identification of existing conditions with regard to visual resources and entails the following steps:

- Objective identification of visual features of the landscape;
- Assessment of the character and quality of those resources relative to overall regional visual character; and
- Assessment of the potential significance of features in the landscape to the people who see them and their sensitivity to the proposed changes to those features.

Viewshed is an area of the landscape that is visible from a particular location (e.g., an overlook) or series of points (e.g., a road or trail). To identify the importance of views of a resource, a viewshed may be broken into distance zones of foreground, middle ground, and background; the County terms for these categories were Near Visibility, Mid-Range Visibility, and Long-Range Visibility, respectively. Generally, the closer a resource is to the viewer, the more dominant it is and the greater its importance to the viewer. Although distance zones in viewsheds may vary between different geographic regions or types of terrain, the County defined Near Visibility as within approximately 1.5 miles, Mid-Range Visibility as between 1.5 and 3 miles, and Long-Range Visibility as greater than 3 miles.

In the Near Visibility zone, the observer is a direct participant, and the views include objects at close range that may tend to dominate the view. This zone is an important linkage because it sets a tone for the quality of a visual resource. Near Visibility views are valued at a maximum level.

In the Mid-Range Visibility zone, the observer focuses on the center of the viewshed. Views tend to include objects that are the center of attention if they are sufficiently large or visually different from adjacent visual features. Details will not be as sharp as the Near Visibility view, but land features will still be distinguishable.

In the Long-Range Visibility zone, the observer can see less detail and distinction in landform and surface features. The emphasis of Long-Range views is an outline or edge. Silhouettes and ridges of one landmass against another are the conspicuous visual parts of the background, with skyline serving as the strongest line. Objects in the background eventually fade to obscurity with increasing distance.

Viewer sensitivity is based on the visibility of resources in the landscape, the proximity of viewers to the visual resource, the relative elevation of viewers to the visual resource, and the types and expectations of individuals and viewer groups. The criteria for identifying the importance of views are related in part to the position of the viewer relative to the resource.

Visual sensitivity also depends on the number and type of viewers and the frequency and duration of views. Generally, visual sensitivity increases with an increase in total number of viewers, the frequency of viewing (e.g., daily or seasonally), and the duration of views (i.e., how long a scene is viewed). Also, visual sensitivity is higher for views seen by people who are driving for pleasure;

people engaging in recreational activities such as hiking, biking, or camping; and homeowners. Sensitivity tends to be lower for views seen by people driving to and from work or as a part of their work. Views from recreation trails and areas, scenic highways, and scenic overlooks are generally assessed as having high visual sensitivity.

Monterey County RMA performed a site reconnaissance on May 4, 2016 to evaluate visibility of the project and photographed the view at seven different vantage point locations looking toward the project site. During the site reconnaissance, the County of Monterey RMA staff conducted a field analysis to determine the visibility of the site from surrounding roadways. At the time of the field survey, the visibility was unobstructed with clear skies, no discernible wind, and no dust.

County staff determined Arroyo Seco Road and Highway 101, depicted in the HKS visual viewshed report as vantage points 2 and 1, respectively, as common public viewing areas. These common public viewing areas are between 2.5 to 4.5 miles away from the site. At this distance, physical staking and flagging pursuant to the Board of Supervisors resolution would not have been visible with normal, unaided vision, as required by the definition for "substantial adverse visual impact." Due to staff's determination that there would be a lack of visibility using the staking and flagging method, County staff requested a 5 x 5 foot orange sign to identify the project's location (RDEIR page 3-12) for the purpose of preparing a visual analysis. The sign was placed on the ridge near a location where the two and three bedroom timeshare villas are proposed. This sign was located at approximately the same elevation as the top of the palm trees existing in the valley in the location of the proposed hotel.

The site's visibility was then documented by driving the roads in the area to identify areas from where the proposed project would and would not likely be visible, with the aid of the requested sign as a reference point to prepare the visual analysis. Pictures were taken at each study location. The orange traffic sign was visible with the unaided eye from the study locations; however, the sign does not show up in the site photos due to the distance from the viewing locations. As a result of this effort, county staff requested that photo simulations be used to convey the visual impact information to the public and to provide the basis for staff's analysis of visibility of the proposed project, and of potential visual impacts from common public viewing areas.

County staff then determined that photo simulations would better allow an analysis of potential impacts for the purpose of application review and for preparation of the environmental document as opposed to Staking and/or Flagging. Staking and/or Flagging Criteria section 1, Delineation, number 4, allows photo simulation as one of the four methods of delineation. Due to the distance from the site to the common public viewing areas, planning staff determined that photo simulations would better meet the purpose as outlined in the Board of Supervisors adopted Staking and/or Flagging Criteria (Board Resolution 09-360, Attachment 1, first paragraph):

> "The purpose of staking and/or flagging is to provide visualization and analysis of projects in relation to County policies and regulations. Staking and/or flagging is intended to help planners and the public visualize the mass and form of a proposed project, or to assist in visualizing road cuts in areas of visual sensitivity."

Following the site reconnaissance, the applicant provided photo documentation of these seven vantage point locations to a firm to prepare a view analysis report. The view analysis report, dated June 21, 2016 (HKS, 2016), presents bird's eye and street views of existing conditions, including visual simulation with the proposed project and an alternate visual simulation of proposed project with relocated condominium timeshare units to a lower elevation. A County Visual Analysis report was prepared for views of the proposed project from Near Visibility, Mid-Range Visibility, and Long-Range Visibility. The County Visual Analysis report included seven vantage points starting from U.S. Highway 101 and traveling westward toward the valley of the proposed project site along Arroyo Seco

Road, Clark Road, and Paraiso Springs Road. The conclusion of this County Visual Analysis report uses a combination of the site visit observations, documentary photos and photo simulations.

The seven vantage point locations are shown in Figure 3.1-3, View Analysis Vantage Points, and are listed below:

- Location #1 (Long-Range Visibility). Highway 101 just north of the Hudson Road intersection looking west toward project site;
- Location #2 (Mid-Range Visibility). Intersection of Arroyo Seco Road and Clark Road looking west toward project site;
- Location #3 (Mid-Range Visibility). Midpoint on Clark Road between Arroyo Seco Road and Paraiso Springs Road looking west toward project site;
- Location #4 (Mid-Range Visibility). Westbound Clark Road approaching the Paraiso Springs Road intersection looking toward project site;
- Location #5 (Near Visibility). Southbound Paraiso Springs Road approaching the Clark Road intersection looking southwest into the valley where project site is located;
- Location #6 (Near Visibility). Westbound on Paraiso Springs Road, passing a reservoir, and looking toward project site; and,
- Location #7 (Near Visibility). Westbound on Paraiso Springs Road approaching the valley where project site is located.

The location of the site within a valley tucked in the side of the foothills limits the visibility of the site from the north and the south. The primary visibility of the site is from an angle that allows the observer to look up into the valley. Based upon this, the visibility of the site was broken into three distances, near, mid-range and long-range visibility, which can be defined as follows:

- Near Visibility: At this distance the observer will be able to see the buildings individually without any loss of definition due to distance.
- Mid-Range Visibility: A distance where the definition of the buildings begin to blend into a mass.
- Long-Range Visibility from Highway 101: The location from which the highest number of observers will view the site.

The County of Monterey RMA evaluated each of these three site visibility ranges with a discussion on existing visibility and visual impact from each vantage viewpoint. The findings were summarized in the County Visual Analysis report and the impacts are discussed below under Impact Analysis section.

Significance Threshold Criteria

As stated in Appendix G of the CEQA Guidelines, a project may create a significant impact related to aesthetics if it would:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- Substantially degrade the existing visual character or quality of public views of the site and its surroundings; (this reflects the revised 2019 CEQA Guidelines Appendix G question, as it clarifies the question by adding the clarifying phrase “public views of” without changing the meaning of the threshold); and/or
- Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

Source: HKS, Inc.

Figure 3.1-3

View Analysis Vantage Points

Paraiso Springs Resort EIR

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3.1.5 Impact Analysis

Alteration of a View from a State-designated Scenic Highway and Damage to Scenic Resources within a State Scenic Highway

There are no State-designated scenic highways in the vicinity of the project site (see Figure 3.1-2, Scenic Highway Corridors and Visual Sensitivity Map). The County never obtained an official scenic road designation for Arroyo Seco Road and the General Plan policy that sought the designation was eliminated in 2010. Therefore, there are no impacts due to alteration of a view from a state-designated scenic highway in the project vicinity.

Adverse Effect on a Scenic Vista and Degradation of the Existing Visual Character or Quality of the Project Site and its Surroundings from Public Areas

Impact 3.1-1:	Implementation of the proposed project would have an adverse effect on a scenic vista and would degrade the existing visual character or quality of the site and its surroundings from public viewing areas. (Less than Significant with Mitigation).

Scenic Vista. As described in the *Central Salinas Valley Area Plan* (Monterey County 1987), visually sensitive areas include the foothills of the Gabilan and Sierra de Salinas mountain ranges, Arroyo Seco watershed, and the Salinas Valley floor. Scenic resources are defined in the plan as "resources within the Planning Area which, because of their scenic value or unusual physical features should either be conserved or protected" (page 14 of the *Central Salinas Valley Area Plan*).

According to Figure 5, Scenic Highway and Visual Sensitivity, of the *Central Salinas Valley Area Plan* (Monterey County 1987), the project site area, the foothills of the Sierra de Salinas range, is considered "highly sensitive." Areas identified as highly sensitive are those possessing scenic resources which are most unique and which have regional or countywide significance and/or because of their prominence of ridgelines and frontal slopes with their unique vegetation, are important in giving the Planning Area its rural character.

In addition, according to the *Central Salinas Valley Area Plan* several of the roads and canyons within the area exhibit scenic qualities sufficient to warrant their designation as a scenic highway or roadway. The County's Scenic Highway System is composed of roads and highways that have been designated as either State Scenic Highways or County Scenic Routes. The central Salinas Valley contains areas of inspiring natural landforms and bucolic rural settings, which can be appreciated from many of its roads and highways. In recognition of the desirability to preserve these scenic corridors for future generations, the Scenic Highway Element of the *Monterey County General Plan* has proposed that many scenic routes in the planning area be constructed or improved to meet the criteria of the Scenic Highway Program. One of these routes is Arroyo Seco Road, which extends more than 15 miles from U.S. Highway 101 (to the north and west of the project site) to Carmel Valley Road (southwest of the project site). Arroyo Seco Road has not been improved to meet these criteria and has not been officially adopted as a scenic route through the project area in the years since the area plan was adopted in 1987.

The proposed project includes construction of 103 one- and two-story clustered visitor-serving hotel units, conference facilities, and various wellness, education, and recreation facilities, all generally clustered in the valley floor as shown in Figures 2-6, Project Site Plan, and Figure 2-7, Conceptual Rendering of the Proposed Project, presented earlier. The proposed project also includes a separate timeshare development, which consists of 60 one- and two-bedroom timeshare units and 17 single-family residential timeshare villas. As shown in Figure 2-12, Planting Plan, the proposed project would include extensive landscaping of the grounds, parking facilities throughout the development, paths, hiking trails, and pedestrian and vehicle bridges. Vegetation will be managed along the project perimeter to achieve a fire safe condition, but will not require clearance of vegetation. Vegetation will

be thinned and dead vegetation removed, but vegetation will remain in the fuel management areas. The visibility of the site, as depicted on the photo simulations, would not be altered by the fuel management methods.

As shown in Figures 2-9a through 2-9h, presented earlier, the proposed elevations of the buildings at the project site would range from approximately 25 feet to 35 feet at the main resort. The elevation at the one-story casitas would be approximately 20 feet and the elevation of the two-story casitas would be approximately 30 feet. Elevation of the wine pavilion would be approximately 28 feet and the institute would be approximately 25 feet.

Based on the elevations of the proposed buildings at the project site, the steep terrain, vegetation density, and topography difference, the project site would be visible from portions of several roadways, including Arroyo Seco Road, Clark Road, Paraiso Springs Road and Highway 101.

From the near visibility locations 5, 6 and 7, the site would be visible. From location 7 the roofs of the hotel, spa and day use areas will be visible as shown in the photo rendering in Exhibit 1, Page 29, of the County Visual Analysis report, and the condominiums on the hillside framing the north side of the site will be fully visible from this location. From location 6, portions of the hotel, spa and day use areas will be visible, and the condominiums on the hillside will be visible (see pages 25-27 of Exhibit 1 of the County Visual Analysis report). From location 5, the site becomes less visible with most of the visual impact from the hillside condominiums. At this location the remainder of the site will only be slightly visible as evidenced by the visual simulation on Page 21 of Exhibit 1 of the County Visual Analysis report.

From the mid-range visibility locations (Locations 2, 3, and 4 of the County Visual Analysis report), the proposed individual buildings become less visible, but the visibility of the rooftops becomes more pronounced as the natural topography rises up the valley floor and the buildings correspondingly increase in elevation. The rooftops of each succeeding building will be visible, and from increasing distances, the rooftops will appear more as a single mass of buildings on the landscape. This will be most pronounced from location 2 at Arroyo Seco Road. At this distance the buildings will have the potential to create a distinct break in the vegetation cover, which is part of the unique scenic resource in this location. The project proposes significant grading to achieve gradients and pads for structures, but significant landforms will not be altered and will not cause a change in topographical appearance from off-site view areas.

From the long-range visibility location (Location 1 of the County's Visual Analysis report), the primary visual impact will be a disruption in the natural vegetation pattern and the buildings will appear as masses against the foothills. The existing palm trees already alter the existing vegetation but this is not noticeable to the traveling public at this distance. The proposed project has the potential, as discussed above for location 2, to create a break in the appearance of the natural landscape.

The area does not have designated scenic roads and the property and area are not within a Visual Sensitivity overlay zoning district. However, the foothills are designated as a scenic vista and the project may have a substantial adverse effect on this scenic vista. Mitigation measure 3.1-1, below, will require landscaping and other techniques that will break the building massing as seen from public viewing areas and would reduce this impact to a less-than-significant level

Changes to Visual Character of the Project Site and its Surroundings.

The project site is located at the western terminus of Paraiso Springs Road on the eastern slope of the Sierra de Salinas Foothills in the Salinas Valley and consists of approximately 235 acres nestled in the mouth of a canyon extending westward into the foothills. The project site is bordered to the north,

south, and west by the Santa Lucia Mountains and to the east by residences and agricultural fields. The *Monterey County General Plan* identifies the project area (mountain range) as visually sensitive based on the prominence of the frontal slopes and the unique vegetation of this area.

The surrounding land is designated by the *Monterey County General Plan* for farmland and rural grazing uses, and is currently used for agriculture and vineyards (where slope allows), and grazing in the steeper areas. According to the *Monterey County Zoning Map*, the project site area being developed as a resort is currently zoned Commercial-Visitor Serving/Professional Office. Other portions of the property are currently zoned Permanent Grazing, 40 acres minimum building site, and Farmlands, 40 acres minimum building site. The County does not have any policies or regulations that consider vehicle travel on public roads, or an increase in vehicle trips as a result of the project that is well within the capacity of the roadway, to be an impact on the public viewshed.

The project site is visible on the approach from Paraiso Springs Road and is identifiable by several tall palm trees. Several single-family residential uses are located below and to the east of the project site on Paraiso Springs Road. The site has been inhabited by Native Americans, missionaries and as a resort. This has resulted in various types of development, as evidenced by the existing improvements including 15 vernacular cabins along the hillside, a changing room, a recreation room, indoor and outdoor baths, six mobile homes, a lodge, a workshop, a yurt compound[2], and several small outbuildings.

Development of the proposed project would change the existing visual character and quality of the project site by increasing the intensity and density of visitor-serving facilities, construction of roadways, and removal of approximately 191 trees and all palm trees, including 185 protected oak trees. The project is proposed to be centralized within the portion of the property that has historically supported development. The project proposes to limit the development footprint to approximately 50 acres of the 235-acre site. The footprint will largely be located at the lower portions of the site to minimize the visual impact associated with development on slopes and higher elevations (as discussed in more detail below). The renderings prepared for the project include mission style architecture using a red terra cotta tile roof and white exterior plaster walls.

Visually the most significant portions of the site relate to the proposed development on steep slopes and higher elevations surrounding Paraiso Valley and Indian Valley. Approximately 66.7 percent of the project site is located on slopes greater than 30 percent as shown in Figure 3.1-4, Slope Analysis. Overall, approximately 25,400 S.F. (1.1%) of the 2,178,000 S.F. proposed for development is located on 30% or greater slopes. Some of the Hillside Village Condominium complex is located in the portion of the project (lots 20-23 with 60 units) along an east/west oriented ridge in the northern portion of the project site within some areas identified as 30 percent or greater slopes. The proposed 17 single-family timeshare villas north of the Hillside Village Condominiums (lots 3-19) are generally within slopes of 20 percent or less, at a higher elevation than the hotel area. Some of the timeshare condominium units proposed and the timeshare villas will be clearly visible from the Paraiso Valley floor, with just some of the condominiums visible from the upper section of Paraiso Springs Road (Locations 5, 6, and 7).

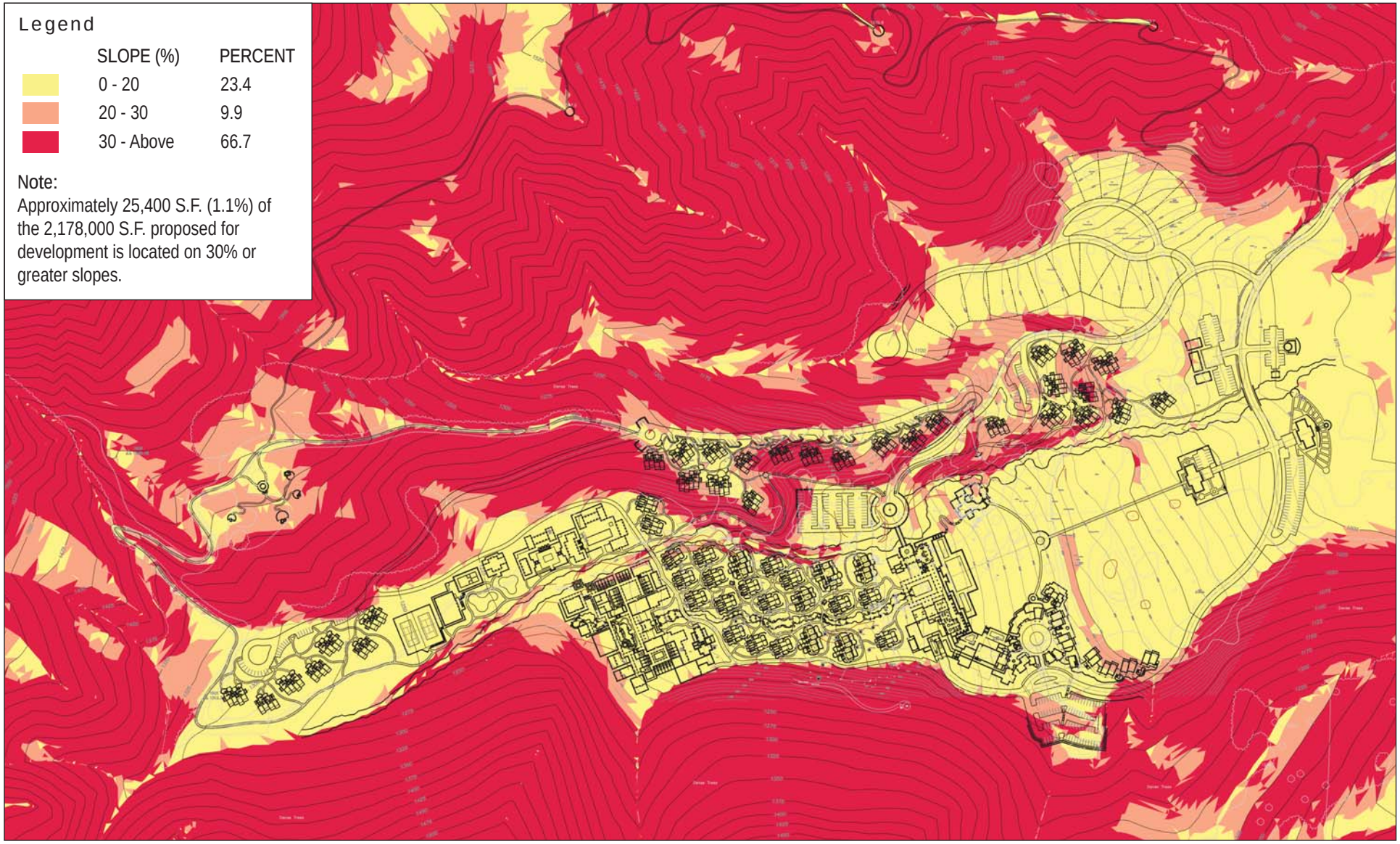
The County Visual Analysis report findings and a review of HKS view analysis indicate that implementation of the project has the potential to interrupt the natural vegetation patterns with large mass of light-colored buildings that highlight the loss of trees and vegetation. The buildings of the proposed project and disruption in the natural vegetation pattern will be visible to the traveling public from U.S. Highway 101 just north of the Hudson Road intersection (Location 1); this view is distant

[2] A yurt is a portable, covered, framed dwelling structure.

and a small portion of the viewshed. Some of the buildings will become highly visible traveling from the intersection of Arroyo Seco Road and Clark Road, and along Clark Road approaching the Paraiso Springs Road intersection. Traveling closer to the project site, the buildings become individually visible along Paraiso Springs Road approaching the valley.

According to the County Visual Analysis report, a project that would significantly detract from the appearance of the slopes and vegetation would constitute a significant impact. Implementation of the proposed project would interrupt the vegetation patterns with a large mass of light-colored buildings with terra cotta roofs, and would be a significant adverse impact. The following mitigation measure to modify project design and colors would comply with policies of the *Monterey County General Plan* and *Central Salinas Valley Area Plan*, and reduce this impact to a less-than-significant level.

In addition, the development of the timeshare condominiums will be along a ridge that supports oak woodland. Some of the trees proposed for removal as part of this project are in this area. The visual impact of the tree removal and the construction of the timeshare condominiums would have an impact to the visual character of the area. This impact can be minimized by replanting native oak trees or other trees and shrubs around the proposed structures and streets, in accordance with fire safe landscaping principles, to further minimize the visibility of these structures and to maintain the integrity of the oak woodland. The following mitigation measure to provide landscaping and other techniques that will break the building massing would reduce this impact to a less-than-significant level:



Source: RBF Consulting 2010, Hill Glazier Architects 2005, Edward D. Stone & Associates 2005

Figure 3.1-4
Slope Analysis

Paraiso Springs Resort EIR

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Mitigation Measure

MM 3.1-1 Prior to issuance of any construction permits, the project applicant shall modify the project landscape design and colors for the exterior roof and plaster walls as follows:

- The roof color shall include a blend of darker shades, which colors would serve to blend the building's rooftops into the natural environment and reduce the appearance of large masses from greater distances. Final design shall be subject to review and approval of the RMA Director.
- The color of the plaster shall utilize a variety of earth tone colors, such as the color supplied in the palette on page 2 in Exhibit 1 of the RMA Analysis, and as otherwise approved by the RMA Director.
- The Landscape Plan shall include the use of five-gallon size or transplanted native oak trees, or other tree or tall shrub species as approved by RMA-Planning, planted, when mature, to break up the building rooflines and the front of the resort when viewed from common public viewing areas in the Salinas Valley, while allowing well-designed openings in the canopy to allow views from the resort of the valley. Oak trees shall be provided in appropriate areas, such as where oak trees were originally present prior to grading in that area, or on the north side of buildings where no oak woodland was present prior to grading. Where oak trees were not part of the original landscape for that area of the site, other tree species shall be used.
- Where buildings are placed in areas that previously consisted of dense oak woodlands, the design of the landscaping shall integrate the buildings into the oak woodland setting such that the buildings, if visible, are viewed in the context of the oak woodland. Native oak trees shall be strategically placed at building corners and extending between buildings and natural landforms or remaining native oak trees to integrate the buildings into the natural landscape. Landscape Plans shall be submitted for review and approval by the RMA Director of Planning for each phase of development and shall be approved prior to issuance of construction permits for buildings within the area covered by the Landscape Plan. Review by the County of the landscape plans will be conducted in consultation with the fire district to ensure that landscaping is installed in a fire-safe manner.

The intent of this mitigation measure is to occasionally break up the mass, not screen the site from the valley or from public views, and to use color and vegetation to break up the visual massing from common public viewing areas. This can be achieved by using existing topography, landscape plantings, and a variety of colors to create variety in the mass. The landscape plantings, while further reducing visibility, will not be fully grown at the time of planting. The mitigation measure's other techniques, as well as existing topography and vegetation that will not be disturbed, will reduce the impact to a less than significant level even while the newly planted vegetation grows to maturity, due to the distance to common public viewing areas. Oak trees can be a planted a distance away from structures and each other, to comply with safe fire-planting principles, and still provide screening from public viewing areas.

The analysis for ridgeline development is a two part test: 1) that the development is on the crest of a hill and 2) the development would create a silhouette against the sky or would otherwise create a substantially adverse impact. The project site includes ridges surrounded by topographic features that are much higher in elevation, so development at this location, as determined by County staff and

ultimately by the decision making body, will not constitute ridgeline development and will not conflict with Policy 26.1.9 of the *Monterey County General Plan*. In addition, the requirements contained in Mitigation Measure 3-1.1 will reduce visual impacts from off-site public viewing locations. While ridgeline development is defined as being development on the crest of a hill that silhouettes against the sky from common public viewing areas, it also includes the possibility of other substantially adverse visual impacts. That would typically be a situation where a viewshed is interrupted by an unexpected adverse visual obstruction. In this case, the resort will be visible from nearby locations as would be expected as the location has operated as a resort for over 100 years. Vegetation, topography and the location of the public road leading to the site will allow that some of the project development will be seen from the public road, but with different views of the project as one moves along the road, and always with the backdrop of the Sierra de Salinas mountain range.

The presence of higher mountains forming the backdrop of this location will minimize the impact to the visual character of the area. Protecting these surrounding landforms and the dominant natural features will help to mitigate the impact of this development upon the visual character of the area. Insuring protection of the higher and steeper slopes surrounding the project from future development will insure that the overall visual quality and character of the site is maintained.

Policy 26.1.10 of the *Monterey County General Plan* allows development on slopes greater than 30 percent in limited circumstances and requires dedication of a scenic easement on slopes of 30 percent or greater. If development on 30% slopes associated with the proposed project is not consistent with Policy 26.1.10 in the *Monterey County General Plan* this would be considered a potentially significant impact. The County requires a Use Permit to consider development on slopes greater than 30%, which allows decision makers the discretion to determine whether the development is appropriate, even if allowed on slopes greater than 30%. In situations where development is proposed on, or could affect, slopes over 30%, the County of Monterey implements the following standard condition of approval:

Standard Condition

PD023 – CONSERVATION AND SCENIC EASEMENT (SLOPE)

A conservation and scenic easement shall be conveyed to the County over those portions of the property where the slope exceeds 30 percent. The easement shall be developed in consultation with a certified professional. A conservation and scenic easement deed shall be submitted to, and approved by, the Director of RMA - Planning and accepted by the Board of Supervisors prior to or concurrent with recording the final map or prior to the issuance of grading or building permits, whichever occurs first. The Final Subdivision Map shall identify the areas within a "scenic easement" and note that no development shall occur within the areas designated as "scenic easement." **(RMA – Planning)**

The decision making body needs to make one of the following findings to allow development on slopes greater than 30%, as required by Monterey County Code Section 21.64.230.E.1:

a. There is no feasible alternative which would allow development to occur on slopes of less than thirty (30) percent; or
b. That the proposed development better achieves the goals, policies and objectives of the Monterey County General Plan and applicable area plan than other development alternatives.

If the development on slopes over 30% is allowed by the decision-making body implementation of the standard condition would ensure consistency with Policy 26.1.10 of the *Monterey County General Plan* by designating slopes greater than 30 percent on the project site as "scenic easements" and would protect the slopes above and around the proposed project to protect the integrity of the natural landforms. This will protect the overall visual character of the site. The impact from that portion of the site which is potentially visible from off site will be minimized by implementation of Mitigation Measure 3.1-1, requiring a strategically designed landscape plan placing native oak and/or other trees

and shrubs around the buildings and development to integrate the development into the environment, and to specifically utilize oak trees in any natural oak woodland area. With these actions and the standard condition associated with light and glare below, the visual character of the site and surrounding area would be maintained and the impact associated with the proposed project would be reduced to a less than significant level.

Increase in Light or Glare

Impact 3.1-2: The proposed project would introduce new sources of lighting that could adversely affect the existing visual resources in the area. (Less than Significant with standard condition of approval).

The proposed project will introduce new light sources including, but not limited to, street lighting, and interior and exterior lighting of the proposed resort/hotel and timeshare units. Stationary light sources have the potential to adversely affect adjacent properties through a "spillover" effect. The nearest residential units to the project site are located to the east within a quarter mile from the project site.

Construction

Construction of the proposed project would occur over an approximately ten-year period. On-site construction lighting may be used on occasion and would represent a marginal increase in existing ambient nighttime light levels on any sensitive receptors because of the small size of any lighted construction area, distance to sensitive receptors, and intervening vegetation and topography. The earliest construction phase would be the closest to the nearest sensitive receptor, which is over 1000 feet from the easternmost portion of the project site. The vast majority of construction is not located near the eastern property line and later phases would be even farther away from sensitive receptors. Construction lighting would only be required for limited duration, purposes and locations on site and would be removed upon completion of the need for nighttime work.

Construction activities are not expected to create sources of glare that could affect visibility in the project area because of the depth of building setbacks from surrounding roadways, the use of low-reflectivity building materials, and the infrequent (or lack of) nighttime construction lighting (Michael Baker International, Memo to Monterey County Planning Department, February 13, 2019). Therefore, impacts due to glare generation and interference with the performance of an off-site activity or adverse effects on views would be less than significant during construction.

Operation

A resort facility found in a commercial zoning district requires outdoor lighting for safety purposes and may include lighting for aesthetics. RDEIR Chapter 2 describes Energy Conservation components of the project description, including use of energy efficient outdoor lighting. The County does not require development project applications to submit final lighting plans prior to approval of a residential or commercial development, as technology changes and code requirements change on a regular basis.

The property is subject to the lighting requirements for controlling effects of light pollution, glare, sky glow and light trespass imposed by California Code of Regulations, Title 24, parts 6 and 11 for a rural designation under a designated Lighting Zone 2 classification, as well as the County applied standard conditions to implement policy or regulations related to protecting resources, including biological and aesthetic resource protection from lighting impacts. Application of these mandatory standard conditions as a result of a project's approval allows the final design, in this case for lighting, to reflect the latest in regulations and technology.

The proposed project would introduce new sources of permanent new sources of lighting within the project site, including exterior and interior lighting. Generally, the topography and landscape of the Project site, which will primarily occupy two valleys, surrounded on three sides by mountains, severely

constrains the influence that Project-related light sources would have on off-site uses or the night sky (Michael Baker International, Memo to Monterey County Planning Department, February 13, 2019).

The only sensitive receptors near the Project site are the single family residences on Paraiso Springs Road. The nearest proposed development on the Project site, at the eastern end of the property, would be separated from the nearest off-site residency by a horizontal distance of at least 1050 feet and an elevation differential, since the Project property sits higher in elevation than residences. Because of distance and topography, Monterey County standard condition requirements for fully controlling lighting impacts offsite, as well as state Title 24 Standards, the project light sources would not substantially increase ambient illumination levels. Potential impacts from light and glare would be less than significant. Timeshare condominium lighting sources may be visible from off-site residences and would incrementally increase ambient illumination levels in this area; however, the increase is expected to be minor and would constitute a less than significant impact due to lighting controls required by Monterey County and by Title 24 for the applicable Lighting Zone.

Lighting from vehicle headlights traveling along public roads to the site could cause a temporary reduction in viewing ability for anyone viewing the night sky. Vehicle trips during the evening peak hour would pass any single location on average about once or twice per minute (up to two vehicles encountered on a road that takes two minutes to traverse (Hatch Mott MacDonald, 2017, page 14). Peak hour for the evening is defined as 4 to 6 p.m. The sky grows dark around 5 p.m. on the shortest day of the year (December 21), so more vehicles would pass by anyone viewing the night sky during the wintertime than in summer, when the sky darkens around 9 p.m. on the longest day of the year. When the sky grows dark after 6 p.m. (February 1 through October 31 for this area), non-peak hour traffic will pass by resulting in relatively fewer trips passing anyone viewing the night sky. Any headlights passing by people viewing the night sky would be transitory and not considered to be a significant impact on the environment.

Only low-reflective building materials, such as darker shades of roofs and plaster walls using a variety of earth tones are required pursuant to Mitigation Measure 3.1-1. Therefore, project-related glare impacts and the potential for interference with the performance of any off-site activity or adverse effects on views would be less than significant.

Most of the new buildings would be located on the valley floor except for some of the timeshare condominiums along a hillside (RDEIR Chapter 2, Figure 2-6, Figure 2-8, Figure 2-12). These timeshare units would be two story structures and may be visible from different locations off-site and could incrementally increase ambient illumination levels in the area; however the increase is expected to be minor for the reasons described in this chapter (Michael Baker International, Memo to Monterey County Planning Department, February 13, 2019).

Indoor Lighting Sources

Interior lighting sources from some hotel units and timeshare units on the project site may be visible from offsite and may increase ambient illumination levels in the area; however the increase is expected to be minor and would constitute a less than significant impact.

Interior source lighting is contemplated under the LZ2 lighting zone designation of "rural" as all residences operate interior lights at night. The hotel rooms and timeshare use of interior lights would be required to be consistent with the LZ2 lighting designation and would be lessened through the Mission Revival architectural style, as described below. These architectural features function as ways to limit light spill toward the sky and off site, due to eave design and a limited number of windows. Consistent with resort properties, it is expected that all rooms will have interior window coverings, curtains and/or shades that will be drawn for privacy at night and act to shield or reduce any lighting effects from interior lights. Interior lighting effects would also be limited as lights would be extinguished as visitors to the resort retire for the night (Michael Baker International, Memo to Monterey County Planning Department, February 13, 2019).

The remainder of the Project site would be undeveloped and not be lighted at night, Sources of lighting would include visible interior building illumination, exterior building security and decorative facade lighting, lighted pedestrian walkways and common areas such as courtyards and swimming pools, and lighting along internal driveways and roadways and at Project site entrances.

Light levels for proposed on-site development would be required to comply with the County standard condition for visually sensitive areas as well as with state law, Title 24, which controls both exterior and interior lighting. Title 24 incorporates the following Illuminating Engineering Society of North America recommendations:

- Select luminaires emitting little to no light above the plane of the horizon;
- Avoid excessively bright spots on ground or surfaces;
- Limit the use of non-cutoff luminaires;
- Turn off non-critical lighting late at night; and
- Use internal or external shielding, such as louvers, hoods, or other screening devices, to minimize up light and resulting sky glow when luminaires need to be tilted or aimed.

Proposed development on the Project site would use building materials with low-reflectivity properties and would not introduce large expanses of glass or light-colored surfaces that could generate glare perceptible from off-site locations. The selected project design, Mission Revival, includes "limited fenestration" and "wide, projecting eaves" (RDEIR Chapter 2, page 2-20). This limits the intrusion of interior light to outdoor areas. The project is setback from surrounding roadways and surrounded on three sides by mountains, and large mature oak trees along with the incorporation of landscaping into the site design would further reduce the potential for Project glare generation. Portions of the project would be visible from mid-range and long-range visibility views (RDEIR Impact 3.1-1). Any glare that may occur from on site structures would be visible for a very short time as the common public viewing areas are high speed county roads and Highway 101 at distances of two to seven miles.

New light sources could result in a greater overall level of light at night adjacent to the project site, thus reducing night sky visibility, affecting the general character of the area. However, Policy 26.1.20 in the *Monterey County General Plan* states that "All exterior

lighting shall be unobtrusive and constructed or located so that only the intended area is illuminated, long range visibility is reduced, and off-site glare is fully controlled." If lighting associated with the proposed project is not consistent with Policy 26.1.20 in the *Monterey County General Plan* this could be considered a potentially significant impact. In situations like this the County of Monterey implements the following standard condition of approval for visually sensitive areas:

Standard Condition

> **PD014(B) – LIGHTING – EXTERIOR LIGHTING PLAN (VISUAL SENSITIVITY DISTRICT/ RIDGELINE DEVELOPMENT)**
>
> All exterior lighting shall be unobtrusive, down-lit, harmonious with the local area, and constructed or located so that only the intended area is illuminated and off-site glare is fully controlled. Exterior lights shall have recessed lighting elements. Exterior light sources that would be directly visible when viewed from a common public viewing area, as defined in Monterey County Code Section 21.06.195, are prohibited. The applicant shall submit three (3) copies of an exterior lighting plan which shall indicate the location, type, and wattage of all light fixtures and include catalog sheets for each fixture. The lighting shall comply with the requirements of the California Energy Code set forth in California Code of Regulations, Title 24, Part 6. The exterior lighting plan shall be subject to approval by the Director of the RMA - Planning Department, prior to the issuance of building permits. **(RMA – Planning Department)**

The County Visual Analysis report for the proposed project reiterated that all lighting for the project be screened to minimize effects from new light sources. Lighting plans shall be submitted to the County for approval and incorporated into the final building plans prior to issuance of a building permit by the County. Implementation of this standard condition would ensure that the proposed project would have a less than significant impact by complying with Policy 26.1.20 in the *Monterey County General Plan* and ensuring that there are not new light sources casting glare off site. The County developed and applies a more restrictive standard condition for visually sensitive areas, such as Big Sur. The visual sensitivity standards of this area, as opposed to the Big Sur planning area, allow development to be visible from common public viewing areas. However, lighting would be strictly controlled through the conditions of approval. The standard condition (PD014(B)) requires that the light source, typically the bulb itself, cannot be visible from common public viewing areas. That means that lighting may be seen from off site, but the bulb (light source) itself is either shielded, recessed, or directed (methods that the planner analyzes to determine if the lighting meets the test of "fully controlled") such that the light source is not visible from common public viewing areas. The condition and county policy, in place and implemented since 1982, further requires that lighting not create glare, which can be a safety hazard if directly shining into someone's eyes or, for example, shining off a wet roadway. Also, by requiring that the light source only illuminate the intended area, the lights are not allowed to cause light pollution to the night sky or to impact adjacent natural areas where wildlife could be adversely affected. While implementing this condition, the project planner reviews a detailed set of plans that includes fixture types, fixture locations and manufacturer's cut sheets to review the lighting plan associated with issuance of building permits. This requirement to illuminate

only the intended area also results in development areas being illuminated, but protects biological habitat remaining on and off site.

With the requirements of state law (Title 24) and the imposition of the County's standard condition requiring a lighting plan for visually sensitive areas, the effects of project lighting would be less than significant when analyzed against the threshold of significance described above in Section 3.1.4. The project setting among a vegetated canyon, the proposed Mission Revival architectural style, its distance to common public viewing areas, the requirements of California Code of Regulations Title 24, Parts 6 and 11, which took effect January of 2017, and the requirements from the County's standard conditions of approval related to design, landscaping and lighting controls would result in a less than significant effect on the environment and no additional mitigation is required. The County's technical consultant found the following:

> "We also reviewed the California state and Monterey County laws that will apply to this development, including Title 24 Part 6 and Part 11, the Monterey County General Plan, Monterey County Design Guidelines for Exterior Lighting, and Monterey County Code 21.22.070 E, and have found that the requirements contained in these laws and codes are sufficient to maintain the site at or below LZ2 levels of light pollution in all forms. We also find no need to apply the Model Lighting Ordinance (MLO) or LEED 4. The lighting requirements of Title 24 are heavily based upon the MLO, and are in some ways even more restrictive. LEED 4 also allows more uplight than allowed by Title 24 and Monterey County codes, guidelines, and standard conditions, which is a major contributor of anthropogenic sky glow." (Michael Baker International, Memo to Monterey County Planning Department, February 13, 2019).

> "Because of the distance and topography, and the fact that the Monterey County standard condition of approval calls for fully controlling lighting impacts offsite, as well as Title 24 Standards, the project light sources would not substantially increase ambient illumination levels. Potential impacts from light and glare would be less than significant" (Michael Baker International, Memo to Monterey County Planning Department, February 13, 2019).

A cumulative light and glare impact would occur if the proposed project, together with other projects located within the proposed project's area, would contribute to a cumulative increase in ambient nighttime light levels or glare generation in that area, as defined in RDEIR section 4.5.2 related to Aesthetics.

The project area includes lighting from residential and agricultural facilities (including wineries). The area does not include substantial lighting from these uses and only one currently proposed project, a residential care facility located within the Las Palmas Ranch project, and one approved project (Ferrini Ranch subdivision) is included in the area subject to the cumulative analysis. The Las Palmas community, which contains approximately 1000 residential units near Spreckels, is 18 miles north of the project site. Due to the distance, light emitting from this project near Soledad would not add cumulatively to light emissions from either area. Also, the Las Palmas Ranch project would also have to comply with the lighting standards controlling light pollution set forth in Title 24 and in county policies. The Ferrini Ranch project is even further away and is

primarily located along the Highway 68 corridor (RDEIR page 4-6), on the north and west side of the Sierra de Salinas mountain range. Very little of that project is visible within the Sierra de Salinas foothills area, which is the area for consideration of the cumulative impact for aesthetics, including light and glare.

Hazards and Hazardous Materials Sections

RDEIR Section 3.7.1, Introduction, is modified to read as follows:

3.7.1 Introduction

This section describes the existing setting of the project site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Paraiso Springs Resort project (project or proposed project). This section of the RDEIR discusses the potential presence of hazards and hazardous materials at or within the vicinity of the project site and analyzes the potential risk of these conditions within the context of existing and proposed development and future human activities. This section is based on a Phase I Environmental Assessment (EA) prepared by Lee & Pierce, Inc. prepared for the project applicant in October 2007. This report is included as Appendix G of the 2018 RDEIR.

This section also focuses on the effect of the proposed project on wildfire risk. Potential wildfire impacts resulting from construction and operation of the proposed project were evaluated based on a review of existing resources, data, and applicable laws, regulations, guidelines, and standards. Fire protection services for the proposed project are addressed in Section 3.11 (Public Services).

Previous reports and information used to prepare this section include the following documents:

- California Board of Forestry and Fire Protection. Personal Communication between Edith Hannigan, Land Use Program Manager and Mike Novo, Monterey County Planning; May 3, 2019.
- California Department of Forestry and Fire Protection (CAL FIRE). 2018a. 2018 *Strategic Fire Plan for California*. http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf1614.pdf
- CAL FIRE. 2018b. *CAL FIRE Unit Strategic Fire Plan, San Benito-Monterey*. April 25.
- CAL FIRE. 2017. *Fire Perimeters* (fire17_1) (GIS Data). http://frap.cdf.ca.gov/data/frapgisdata/select.asp
- CAL FIRE. 2010. *California's Forests and Rangelands: 2010 Assessment*. http://frap.fire.ca.gov/assessment/2010/assessment2010
- CAL FIRE. 2009. *Post Fire Erosion* (thr_erosclass09_1) (GIS Data). http://frap.fire.ca.gov/data/assessment2010/data/thr_erosclass09_1.gdb.zip
- CAL FIRE. 2007. *"Monterey County Fire Hazard Severity Zones in SRA." November 7, 2007*. Accessed at: http://frap.fire.ca.gov/webdata/maps/monterey/fhszs_map.27.pdf

- CAL FIRE. 2005. *Fire Threat Version 05_1* (GIS Data). http://frap.fire.ca.gov/data/statewide/fthrt05_1.zip
- CH2MHill. 2005. Technical Memo to Thompson Holdings, L.L.C., subject: *Paraiso Springs Resort: Preliminary Fire Protection Plan*. July 15, 2005.
- Dudek. 2019. *Fire Protection Plan – Paraiso Springs Resort, Monterey County*. May 3.
- Lipsett, M. 2008. *Wildfire Smoke: A Guide for Public Health Officials*. July 2008. Accessed February 7, 2019. https://oehha.ca.gov/media/downloads/public-information/document/wildfirev8.pdf
- Moench, R., & Fusaro, J. 2012. *Soil Erosion Control after Wildfire - 6.308*. Colorado State University Extension. Accessed at: https://mountainscholar.org/bitstream/handle/10217/183596/AEXT_063082012.pdf?sequence=1&isAllowed=y
- Monterey County. 2019. GIS Webapps: *Fire Protection Areas (WUI and FHSZ in SRA) map*. Accessed at: http://www.co.monterey.ca.us/government/departments-i-z/resource-management-agency/gis
- Monterey County. 2015. *Multi-Jurisdictional Hazard Mitigation Plan*. June.
- Monterey County. 2010. *2010 Monterey County General Plan*. October 26.
- Monterey County. 1987. *Central Salinas Valley Area Plan*. November 1987.
- Monterey County. 1982. *Monterey County General Plan*. August 1982 with Amendments through November 5, 1996.
- Rana Creek Environmental Planning. 2005. *Paraiso Hot Springs Biological Assessment*. July 2005
- Smalley, J. 2008. *"Wildfires and Climate Change: An American Perspective on a Global Issue." Fire Interdisciplinary Research on Ecosystem Services (Seminar). June 24, 2008*. http://www.fires-seminars.org.uk/downloads/seminar2/smalley_public_keynote.pdf.
- Syphard A.D., and J.E. Keeley. 2016. *"Historical Reconstructions of California Wildfires Vary by Data Source."* International Journal of Wildland Fire 25(12):1221–1227. https://doi.org/10.1071/WF16050.
- USDA (U.S. Department of Agriculture). 2000a. *Wildland Fire in Ecosystems: Effects of Fire on Flora.* General Technical Report RMRS-GTR-42-vol. 2. Ogden, Utah: USDA, Forest Service, Rocky Mountain Research Station. December 2000.
- USDA. 2000b. *Wildland Fire in Ecosystems: Effects of Fire on Fauna*. General Technical Report RMRS-GTR-42-vol. 1. Ogden, Utah: USDA, Forest Service, Rocky Mountain Research Station. January 2000.
- USDA. 2005. *Wildland Fire in Ecosystems: Effect of Fire on Soil and Water*. General Technical Report RMRS-GTR-42-vol. 4. Ogden, Utah: USDA, Forest Service, Rocky Mountain Research Station. September 2005.
- United States Forest Service (USFS). 2019. *National Fire Plan*. Accessed February 2019. https://www.forestsandrangelands.gov/resources/overview/index.shtml

RDEIR Section 3.7.2, Environmental Setting, Fire Hazards, is modified to read as follows:

3.7.2 Environmental Setting, Fire Hazards section only

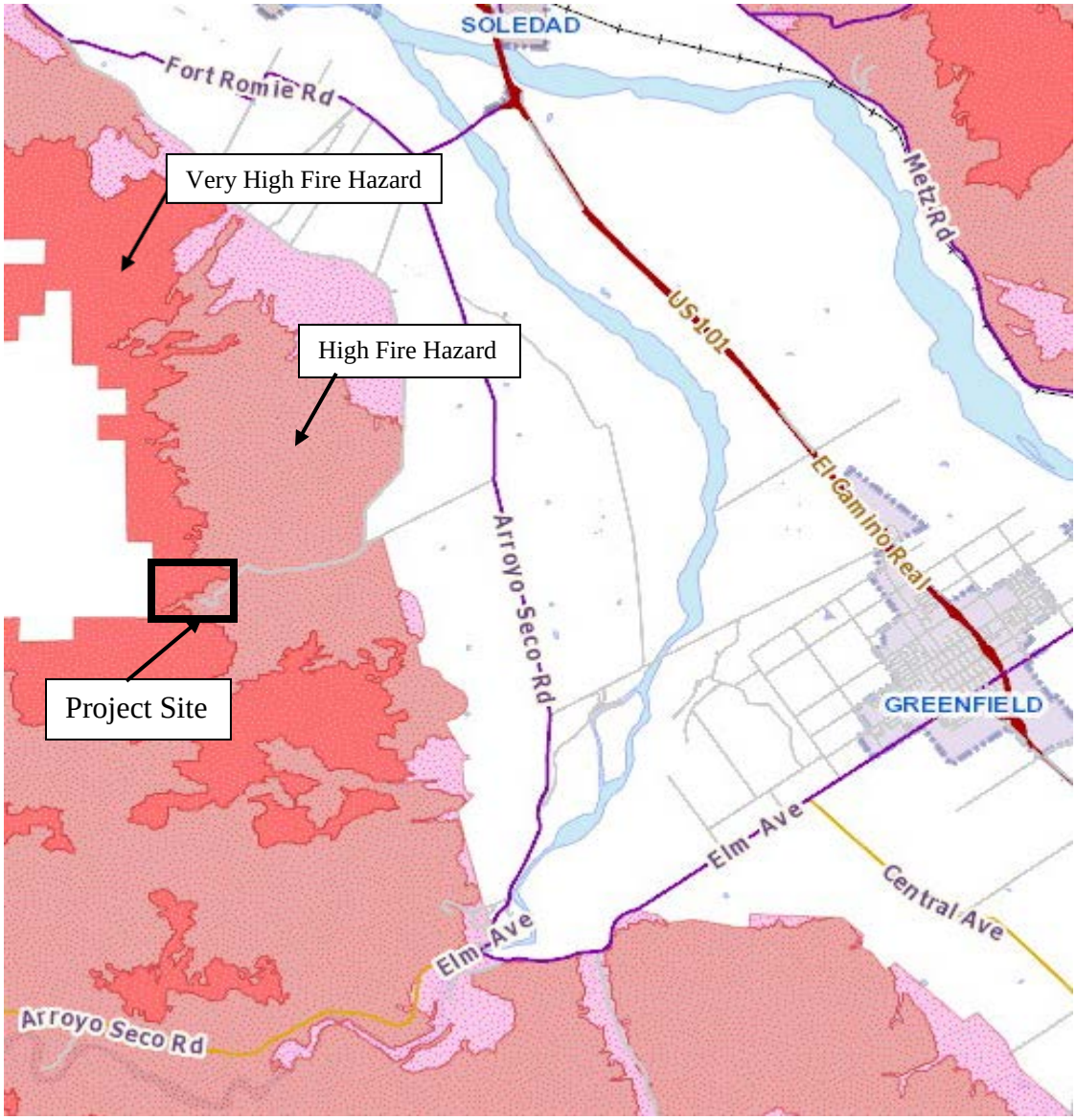
Fire environments are dynamic systems and are influenced by many types of environmental factors and site characteristics. Fires can occur in any environment where conditions are conducive to ignition and fire movement. The three major components of fire environment are vegetation (fuels), climate, and topography. The state of each of these components and their interactions with each other determines the potential characteristics and behavior of a wildfire. In addition, the type, location, and intensity of a wildfire can affect wildlife, vegetation, air quality, water quality, and slope stability to varying degrees, as discussed below.

It is important to note that wildland fire may transition to urban fire if structures are receptive to ignition. Understanding the fire environment on and adjacent the proposed project site is necessary to understand the potential for fire within and around the project site. The project site is located in one of the foothill/canyon areas of the Central Salinas Valley that has been identified as a high and very high fire hazard area (Monterey County 1982, Monterey County 2010). The project site has been subject to structural fires over the years, including one that destroyed a number of structures including the main lodge. However, the site has not been located within larger wildfires (Dudek, 2019).

Based on Fire Hazard Severity Zone (FHSZ) mapping data (CAL FIRE 2007, Monterey County 2019), the proposed project site is located within both High FHSZ (HFHSZ) and Very High FHSZ (VHFHSZ). The California Department of Forestry and Fire Protection (CAL FIRE) uses FHSZs to classify anticipated fire-related hazards for the entire state and includes classifications for State Responsibility Areas (SRAs), Local Responsibility Areas (LRAs), and Federal Responsibility Areas (FRAs). Fire hazard severity classifications take into account the following elements: vegetation, topography, weather, crown fire production, and ember production and movement. The High and Very High Fire Hazard Severity designations can be attributed to a variety of factors including highly flammable, dense, drought-adapted chaparral vegetation; seasonal, strong winds; and a Mediterranean climate that results in vegetation drying during the fall months. CAL FIRE also maps and ranks areas of fire threat, which indicates the level of fire threat based on the potential fire behavior (fuel rank) and expected fire frequency (fire rotation) at a given location (CAL FIRE 2005). The proposed project occurs within areas ranked high and very high fire threat. Figure 3.7-1 (Fire Severity Zones) identifies the CAL FIRE FHSZ designations in the vicinity of the proposed project.

The following sections provide more information regarding the fire environment associated with the proposed project and potential environmental effects of wildfire burning on or near the proposed project site.

3.7-1 Fire Severity Zones



Vegetation/Fuels

As described in Section 3.3 (Biological Resources), there are 14 vegetation types that comprise the proposed project site, as presented in Table 3.7-1.

Table 3.7-1 Existing Vegetation Types within the Project Site

Vegetation Type	Existing Conditions (acres)
Annual Grassland	28.41
Baccharis Scrub	7.65
Diablan Sage Scrub	117.38
Eucalyptus	1.54
Landscaped	2.85
Landscaped – Lawn	3.48
Mixed Hardwood Forest	39.62
Mixed Oak/Landscape Trees	1.11
Oak Woodland	22.60
Palm Trees	0.48
Pond	0.45
Riparian	2.05
Seasonal Wet Seep	0.21
Wetland	0.08
Total	***227.91***
Source: Rana Creek 2005	

Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading. For example, grass dominated plant communities become seasonally prone to ignition and produce lower intensity, higher spread rate fires. In comparison, sage scrub can produce higher heat intensity and higher flame lengths under strong, dry wind patterns, but does not typically ignite or spread as quickly as light, flashy grass fuels.

Another important factor is the dynamic nature of vegetation communities. Fire presence and absence at varying cycles or regimes disrupts plant succession, returning it to a pre-fire plant community where less fuel is present for a period of time as the plant community begins its succession again. High frequency fires tend to convert shrublands to grasslands or maintain grasslands, while fire exclusion tends to convert grasslands to shrublands, over time. In general, biomass and associated fuel loading will increase over time, assuming that disturbance (fire, farming, grazing, or grading) or fuel reduction efforts are not implemented. It is possible to alter successional pathways for varying plant communities through manual alteration.

Weather

As described in RDEIR Section 3.2, Air Quality, Monterey County lies within the North Central Coast Air Basin. A semi-permanent high-pressure cell in the eastern Pacific Ocean is the basic controlling factor in the air basin's climate. In the summer, a

dominant, high pressure cell causes persistent west and northwest winds over the coast. The generally northwest-southeast orientation of mountain ranges surrounding the Salinas Valley restricts and channels summer on-shore air currents. Surface heating in the interior portion of the Salinas Valley intensifies on-shore airflows during the afternoon and evening. In the fall, surface winds become weak, dissipating altogether on some days. Airflow is occasionally reversed in a weak offshore movement, and the relatively stationary air mass is held in place by the high-pressure cell. During the winter, the high-pressure cell migrates southward and has less influence on the air basin. Air frequently flows in a southeasterly direction out of the Salinas and San Benito valleys, especially during night and morning hours. Northwest winds are nevertheless still dominant in winter, but easterly flow is more frequent.

For the project region, wind speed data was analyzed for modeling potential fire behavior in support of the project's fire protection plan (Dudek 2019). Data was obtained from the Arroyo Seco Remote Automated Weather Station (RAWS), which is located approximately six miles southwest of the proposed project site. Based on this data, average (50^{th} percentile) sustained wind speeds for the region are approximately 10 miles per hour (mph) and extreme (97^{th} percentile) sustained wind speeds are 19 mph, with gust speeds reaching 50 mph (Dudek 2019).

Topography

Site topography is influenced by the Paraiso Springs drainage, which bisects the property from its southwest corner to approximately midway along its eastern boundary. Indian Valley drainage also affects site topography, converging with the Paraiso Springs Valley drainage in the central/eastern portion of the property. Site elevations range from approximately 960 feet above mean sea level (amsl) where the Paraiso Springs Valley drainage exits the property along its eastern boundary, to approximately 2,000 feet amsl in the property's northeast corner. Slope aspects across the property vary based on slope position relative to the site's drainages, with south-, east-, and north-facing slopes dominating the site. Slope gradients on site range from relatively flat in the central, developed portion of the site, up to approximately 70% along the slopes that extend upward from the developed central portion of the property.

Regionally, the proposed project site is situated at the eastern edge of the Sierra de Salinas range where it slopes easterly down to the Salinas Valley. Terrain in this region, and on the project site, include components that are favorable to wildfire spread including steep slopes, ravines, ridges, mountains, and valleys. These terrain features influence the speed and direction of air movement, which has a direct effect on wildfire behavior.

Fire History

Fire history data can provide an understanding of fire frequency, fire type, burn severity, significant ignition sources, and other information relevant to understanding the fire and fuels environment in an area. There have been numerous recorded wildfires within the project study area. Fire history data was obtained from CAL FIRE's Fire and Resources Assessment Program (FRAP) database. FRAP summarizes fire perimeter data dating to the late 1800s, but which is incomplete due to the fact that it includes only fires over 10 acres in size and has incomplete perimeter data, especially for the first half of the 20th century (Dudek 2019). However, the data does provide a summary of recorded fires and

can be used to show whether large fires have occurred in the project area, which indicates whether they may be possible in the future.

Fire history records document 156 wildfires within 5 miles of the project site between 1932 and 2016 (CAL FIRE 2017), primarily to the west and south in the nearby Sierra de Salinas and Santa Lucia Ranges in the Los Padres National Forest. Based on a review of the fire history information, average fire return interval for the area within 5 miles of the project site is 6 years, with intervals ranging from 1 to 14 years. Average fire return interval for large fires (>1,000 acres) within 5 miles of the project site is 12.7 years, with intervals ranging from 1 to 41 years (CAL FIRE 2017). While structural fires have occurred on site in the old resort buildings, no wildfires in the recorded history have burned onto the project site (Dudek 2019).

Environmental Effects of Wildfires

Although wildfire can benefit natural ecosystems that have evolved with occasional burning and that benefit from the stimulation of growth through the reproduction of plants and wildlife habitat, fire can also be detrimental to biological and other natural resources, such as air quality and water quality.

Biological Resources

Flora

Grassland communities, usually non-native grasses, will readily establish after wildfires in chaparral and scrub communities. With repeated burning at short intervals of up to several years, it is possible to convert chaparral and scrub to non-native grasslands. Chaparral and scrub vegetation communities will typically re-sprout and absent fire or other disturbances will return to pre-fire conditions. Chaparral communities also tend to repopulate many forest types following stand-replacing fire. The chaparral may establish for the first several years after the fire event, whereupon the tree cover will begin to establish (USDA 2000a). Because vegetation communities can be converted following fire, these changes in dominant vegetation communities can drastically affect plant and animal habitat and can affect the prevalence of special-status species.

Fauna

Generally speaking, fires injure or kill a relatively small proportion of wild animals. For example, birds and larger mammals can flee wildfire, and small mammals and reptiles can seek refuge in subterranean burrows. Habitat changes resulting from fires have a much more profound impact on faunal populations and communities than does the fire itself. Fires can result in short-term increases in vegetation productivity and the availability and nutrient content of forage and browse (USDA 2000b). These increases can in turn lead to increases in herbivore populations. However, any increase in population size is highly dependent upon the population's ability to survive in the post-fire environment (USDA 2000b). In general, fires that devastate a landscape featuring many shrubs and trees temporarily reduce habitat cover for species requiring cover and increase habitat for species (such as raptors) that prefer open areas (USDA 2000b).

Air Quality

Carbon dioxide, water vapor, carbon monoxide, particulate matter, hydrocarbons, and other constituent materials are all present in wildfire smoke. The specific composition of smoke depends largely on the fuel type (vegetation types contain different amounts of cellulose, oils, waxes, and starches, which when ignited produce different compounds). In addition, hazardous air pollutants and toxic air contaminants, such as benzene and formaldehyde, are also present in smoke. However, the principal pollutant of concern from wildfire smoke is particulate matter. In general, particulate matter from smoke is very small in size and can be inhaled into the deepest recesses of the lungs, presenting a serious health concern (Lipsett 2008).

Factors including weather, stage of fire, and terrain can all dictate fire behavior and the impact of wildfire smoke. Wind, for instance, generally results in lower smoke concentrations because wind causes smoke to mix with a larger volume of air. Large quantities of pollutants can also be released by wildland fires over a relatively short period of time. Air quality during large fires can become severely hazardous and can remain impaired for several days after the fire is ignited (Lipsett 2008).

Water Quality

Fire can impact water quality by increasing potential for erosion and sedimentation in areas where vegetation has been burned, resulting in increased water temperature through removal or drastic modification of shade-providing trees and vegetation. Water chemistry can also be altered through the introduction of pollutants and chemical constituents. Aquatic environments may also be impacted through the introduction of fire retardant chemicals used during firefighting activities.

Erosion and Sedimentation

Watersheds severely burned by wildfire are vulnerable to accelerated rates of soil erosion and can experience large amounts of post-fire sediment deposits. Increases in post-fire suspended sediments in streams and lakes (in addition to possible increases in turbidity) can result from erosion and overland flow, channel scouring, and creep accumulations in stream channels after an event (USDA 2005). While less is known regarding the effect of fire on turbidity, it has been observed that post-fire turbidity levels in stream water are affected by the steepness of the burned watershed (USDA 2005). The little data available regarding post-fire turbidity levels has indicated that U.S. Environmental Protection Agency (EPA) water quality standard for turbidity can be exceeded after a fire event (USDA 2005). In some cases, during severe, slow-moving fires, the combustion of vegetation during wildfires creates a gas that can penetrate the soil. As the soil cools, this gas condenses and forms a waxy coating which causes the soil to repel water. This phenomenon, called hydrophobicity, increases the rate of surface water runoff as water percolation into the soil is reduced (Moench and Fusaro 2012).

The threat to water quality from erosion following wildfire was analyzed by CAL FIRE (2009). This analysis estimates an expected erosion rate if an area experiences a high severity fire and considers information on fire rotation to better identify locations that are more likely to experience frequent high severity fires (CAL FIRE 2010). Mapping data generated from this analysis indicates that the proposed project is classified as primarily having low and moderate erosion potential, although an area in the northwest portion of

the property is classified as having high post-fire erosion potential (CAL FIRE 2009). Areas of low erosion potential on the proposed project site are associated with lower elevations where proposed development is concentrated. Erosion potential increases on the slopes surrounding the proposed development area.

Water Temperature

When fire burns stream bank vegetation and shade trees, water temperature can rise, which in turn can lead to thermal pollution, which leads to increased biological activity in the stream. Increased activity levels place a greater demand on the dissolved oxygen content of the water and can affect the survivability and sustainability of aquatic populations and communities (USDA 2005). Water temperature increases up to 62° Fahrenheit (°F) have been recorded in stream flows following fires in which the stream bank vegetation was burned (USDA 2005).

Water Chemistry

Ash deposits generated by a fire can affect the pH of water immediately after the event, potentially increasing to levels that violate water quality standards. In addition, increases in the pH of nearby soil can also cause increases in stream flow pH (USDA 2005). Dissolved nitrogen levels can increase after fires as a result of accelerated mineralization and nitrification (dissolved nitrogen is commonly studied as an indicator of fire disturbance), but these levels do not typically exceed established water quality standards (USDA 2005). Dissolved phosphorous, sulfur, chloride, and total dissolved solids levels can increase after a fire, but studies have shown that these increases typically do not result in violation of drinking water quality standards (USDA 2005).

Fire Retardant

The use of fire retardants to protect communities, sensitive resources, or other assets has proven highly effective, but it can have a direct effect on aquatic environments. The use of ammonium-based retardants can affect water quality, and, in some instances, they can be toxic to aquatic biota (USDA 2005). Nitrogen-containing retardants can potentially affect drinking water quality, and retardants containing sodium ferrocyanide can potentially be lethal for aquatic organisms (USDA 2005).

The following information is added to 2018 RDEIR Section 3.7.3, Regulatory Background, Federal:

3.7.3 Regulatory Background

Federal

National Fire Protection Association Codes, Standards, Practices, and Guides

National Fire Protection Association (NFPA) codes, standards, recommended practices, and guides ("NFPA Documents") are developed through a consensus standards development process approved by the American National Standards Institute (ANSI). This process brings together professionals representing varied viewpoints and interests to

achieve consensus on fire and other safety issues. NFPA standards are recommended guidelines and nationally accepted good practices in fire protection but are not law or "codes" unless adopted as such or referenced as such by the California Fire Code or the Local Fire Agency.

Federal Wildland Fire Management Policy

The Federal Wildland Fire Management Policy was developed in 1995, updated in 2001, and again in 2009, by the National Wildfire Coordinating Group, a federal multi-agency group that establishes consistent and coordinated fire management policy across multiple federal jurisdictions. An important component of the Federal Wildland Fire Management Policy is the acknowledgement of the essential role of fire in maintaining natural ecosystems. The Federal Wildland Fire Management Policy and its implementation are founded on the following guiding principles:

- Firefighter and public safety are the first priority in every fire management activity.
- The role of wildland fire as an essential ecological process and natural change agent will be incorporated into the planning process.
- Fire management plans, programs, and activities support land and resource management plans and their implementation.
- Sound risk management is a foundation for all fire management activities.
- Fire management programs and activities are economically viable, based upon values to be protected, costs, and land and resource management objectives.
- Fire management plans and activities are based upon the best available science.
- Fire management plans and activities incorporate public health and environmental quality considerations.
- Federal, state, tribal, local, interagency, and international coordination and cooperation are essential.
- Standardization of policies and procedures among federal agencies is an ongoing objective.

National Fire Plan

The National Fire Plan was a presidential directive in 2000 as a response to severe wildland fires that had burned throughout the United States. The National Fire Plan focuses on reducing fire impacts on rural communities and providing assurance for sufficient firefighting capacity in the future. The plan addresses five key points: Firefighting, Rehabilitation, Hazardous Fuels Reduction, Community Assistance, and Accountability. The plan continues to provide invaluable technical, financial, and resource guidance and support for wildland fire management across the United States. The USDA Forest Service and the Department of the Interior are working to successfully implement the key points outlined in the plan (USFS 2019).

International Fire Code

Created by the International Code Council, the International Fire Code addresses a wide array of conditions hazardous to life and property including fire, explosions, and hazardous materials handling or usage (although not a federal regulation, but rather the product of the International Code Council). The International Fire Code places an emphasis on prescriptive and performance-based approaches to fire prevention and fire

protection systems. Updated every 3 years, the International Fire Code uses a hazards classification system to determine the appropriate measures to be incorporated in order to protect life and property (often times these measures include construction standards and specialized equipment). The International Fire Code uses a permit system (based on hazard classification) to ensure that required measures are instituted.

International Wildland-Urban Interface Code

The International Wildland–Urban Interface (WUI) Code is published by the International Code Council and is a model code addressing wildfire issues.

The following information is added to 2018 RDEIR Section 3.7.3, Regulatory Background, State:

State

California Building Code

Chapter 7A of the California Building Code (CBC) applies to building materials, systems and/or assemblies used in the exterior design and construction of new buildings located within a Wildland-Urban Interface Fire Area. The purpose of this chapter is to establish minimum standards for the protection of life and property by increasing the ability of a building located in any Fire Hazard Severity Zone within State Responsibility Areas or any Wildland-Urban Interface Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses. New buildings located in such areas are required to comply with the ignition resistant construction standards outlined in Chapter 7A.

California Fire Code

The California Fire Code (CFC) is contained within Title 24, Chapter 9 of the California Code of Regulations (CCR). Based on the International Fire Code, the CFC is created by the California Buildings Standards Commission and regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. Similar to the International Fire Code, the CFC and the California Building Code (CBC) use a hazards classification system to determine the appropriate measures to incorporate to protect life and property.

California Public Resources Code

These regulations are discussed in further detail as follows:

- **Public Resource Code 4290** requires minimum fire safety standards related to defensible space that are applicable to state responsibility area lands and lands classified and designated as very high fire hazard severity zones.
- **Public Resource Code 4291** requires a reduction of fire hazards around buildings, requiring 100 feet of vegetation management around all buildings, and is the primary mechanism for conducting fire prevention activities on private property within CAL FIRE jurisdiction.

Fire Hazard Severity Zoning

CAL FIRE mapped FHSZs in Monterey County based on fuel loading, slope, fire

weather, and other relevant factors as directed by Public Resources Code Sections 4201–4204 and Government Code Sections 51175–51189. FHSZs are ranked from moderate to very high and are categorized for fire protection within a Federal Responsibility Area (FRA), State Responsibility Area (SRA), or Local Responsibility Area (LRA) under the jurisdiction of a federal agency, CAL FIRE, or local agency, respectively.

California Strategic Fire Plan

The 2018 Strategic Fire Plan for California reflects CAL FIRE's focus on (1) fire prevention and suppression activities to protect lives, property, and ecosystem services, and (2) natural resource management to maintain the state's forests as a resilient carbon sink to meet California's climate change goals and to serve as important habitat for adaptation and mitigation. The Plan's vision is for a natural environment that is more fire resilient, buildings and infrastructure that are more fire resistant, and a society that is more aware of and responsive to the benefits and threats of wildland fire, all achieved through local, state, federal, tribal, and private partnerships (CAL FIRE 2018a). Plan goals include the following:

1. Identify and evaluate wildland fire hazards and recognize life, property and natural resource assets at risk, including watershed, habitat, social and other values of functioning ecosystems. Facilitate the collaborative development and sharing of all analyses and data collection across all ownerships for consistency in type and kind.
2. Promote and support local land use planning processes as they relate to: (a) protection of life, property, and natural resources from risks associated with wildland fire, and (b) individual landowner objectives and responsibilities.
3. Support and participate in the collaborative development and implementation of local, county and regional plans that address fire protection and landowner objectives.
4. Increase fire prevention awareness, knowledge and actions implemented by individuals and communities to reduce human loss, property damage and impacts to natural resources from wildland fires.
5. Integrate fire and fuels management practices with landowner/land manager priorities across jurisdictions.
6. Determine the level of resources necessary to effectively identify, plan and implement fire prevention using adaptive management strategies.
7. Determine the level of fire suppression resources necessary to protect the values and assets at risk identified during planning processes.
8. Implement post-fire assessments and programs for the protection of life, property, and natural resource recovery.

The following information is added to 2018 RDEIR Section 3.7.3, Regulatory Background, Local:

Local

CAL FIRE San Benito-Monterey Unit Strategic Fire Plan

The 2018 CAL FIRE/San Benito-Monterey Unit Strategic Fire Plan (CAL FIRE 2018b) is produced on an annual basis for the coming fire season. The Plan includes an assessment of the fire situation in the Unit (which includes Monterey County),

stakeholder contributions and priorities, and strategic targets for pre-fire solutions developed by people who reside and work in the local area. The Unit Strategic Fire Plan is designed to achieve the goals and objectives of the Strategic Fire Plan for California under the direction of the Unit's Pre-Fire Engineer. After identifying and evaluating existing wildfire hazards, the Plan supports collaboration between stakeholders in the implementation and development of actions to reduce potential for a wildfire and ensure adequate response in the event of a wildfire.

Monterey County Fire Code

Standard defensible space requirements as identified in Monterey County Code, Chapter 18.09, requires the removal of combustible vegetation from within a minimum of 100 feet or to the property line from structures, whichever is closer. In these fuel management areas, vegetation must be no taller than four inches (4") high, trees must be limbed six feet up from ground and limbs must be removed within 10 feet of chimneys. Additional or alternate fire protection approved by the fire code official may be required to provide reasonable fire safety. Environmentally sensitive areas may require alternative fire protection, to be determined by the fire code official and other jurisdictional authorities.

The following information replaces the last paragraph of 2018 RDEIR Section 3.7.4, Analytical Methodology and Significance Threshold Criteria, Methodology:

The wildfire section of this chapter is based primarily on a review of applicable fire planning documents prepared for the proposed project, specifically the *Preliminary Fire Protection Plan* prepared by CH2MHill (2005) included in the General Development Plan (2019 RDEIR Appendix 1) and the *Fire Protection Plan* prepared by Dudek (2019) (2019 RDEIR Appendix 2). A field survey was also conducted on April 17, 2019 to evaluate the site's fire environment and support preparation of the *Fire Protection Plan* (Dudek 2019). Additionally, the following plans, documents, and data sets were reviewed to evaluate project-related impacts to wildfire:

- 1982 County of Monterey General Plan
- 1987 Central Salinas Valley Area Plan
- 2015 Monterey County Multi-Jurisdictional Hazard Mitigation Plan
- Monterey County Fire Hazard Severity Zone Mapping Data
- CAL FIRE Mapping Data for Fire History, Fire Threat, Fire Hazard Severity, and Erosion Threat

The following information replaces the last two bullets of 2018 RDEIR Section 3.7.4, Analytical Methodology and Significance Threshold Criteria, Significance Threshold Criteria:

The 2019 version of the *CEQA Guidelines*, Appendix G, provided new sample questions related to wildfire hazards. Although the CEQA Guidelines do not require that

preparation of this 2019 RDEIR use the new questions, the County has chosen to analyze the project's potential environmental impacts against these new questions.

If the project is located in or near state responsibility areas or lands classified as very high fire hazard severity zones, a significant impact related to wildfire would occur if the project would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan.
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

The following information replaces Impact 3.7-6 of 2018 RDEIR Section 3.7.5, Potential for Wildfire Hazards at the Project Site:

Substantially Impair An Emergency Reponses Plan/Emergency Evacuation Plan

Impact 3.7-6:	Implementation of the proposed project will not affect an emergency response plan or emergency evacuation plan. However, project implementation may impact emergency response and evacuation efforts. This is considered a potentially significant impact. (Less than Significant with Mitigation).

The proposed project does not occur along or utilize local roadways that are an identified evacuation route. The closest identified evacuation route to the proposed project site is Arroyo Seco Road (G17), approximately 2.8 miles from the proposed project site entrance via Paraiso Springs Road and Clark Road (Monterey County 2010). The proposed project is not expected to impair evacuation procedures along this road due to its low traffic volumes and rural land uses along Arroyo Seco Road. An analysis of evacuation from the proposed project site and its effect on other evacuation traffic (residents, vineyard staff) along Paraiso Springs Road was conducted during development of the project's Fire Protection Plan (Dudek 2019) and is discussed below.

The project site is located within the Mission Soledad Rural Fire Protection District (MSRFPD) with the closest station located at 525 Monterey Street in the City of Soledad. This station is operated by CAL FIRE under contract to the City of Soledad and the MSRFPD. Fire agency response to the proposed project site was calculated at 15 minutes and 46 seconds (Dudek 2019), according to the Insurance Service Office (ISO) travel time formula. Policy 17.3.3 of the 1982 Monterey County General Plan (Monterey County 1982) encourages all new development to be located within the response time of 15 minutes from the fire station responsible for serving the parcel. Policy 17.3.3 also states that if this is not possible, on-site fire protection systems (such as fire breaks, fire-

retardant building materials, and/or water storage tanks) must be installed and approved by the local fire jurisdiction. The County does not have any regulations that require a response time of 15 minutes.

The proposed project includes installation of a fire hydrant network, a dedicated fire water pipeline system, a 500,000-gallon water supply tank, and fire department hose connections at the hotel site (Preliminary Fire Protection Plan (CH2MHill 2005)—found in General Development Plan, 2019 RDEIR Appendix 1). As the project site occurs within HFHSZ and VHFHSZ, it will be built to the latest ignition resistant building codes found in PRC 4290 and Chapter 7A of the California Building Code, as adopted by Monterey County, and any additional restrictions or requirements adopted locally by the MSRFPD. Defensible space (fuel management areas) will also be installed and maintained within 100 feet of all project structures. With incorporation of these project features and mitigation measure MM 3.7-6a (additional fire protection measures outlined in the project's Fire Protection Plan (Dudek 2019, RDEIR Appendix 2)) and MM 3.7-6b (vegetation management along project roads), emergency response to the project site would be consistent with 1982 General Plan Policy 17.3.3.

In addition to the policies identified in the County's General Plan, a more in-depth analysis of the proposed project's fire protection and evacuation system was conducted by Dudek in 2019 (2019 RDEIR Appendix 2). This analysis addressed project road capacity, offsite road improvements, project population impacts on evacuation traffic, project population impacts on increased fire potential, increased fire potential impacts to offsite residents, evacuation contingency plans, dead end road lengths, and emergency response. The following summarizes the findings of this analysis:

- Road Capacity: The analysis determined that all project guests and employees could be evacuated from the site to the intersection of Paraiso Springs Road and Clark Road in just over 17 minutes, considering road capacity, distance, and speed variables and factoring in reductions associated with delays and congestion during an emergency situation. Paraiso Springs Road and its connectors include significantly more capacity to move vehicles than would be utilized by project evacuation traffic and existing resident/vineyard evacuation traffic. The road capacity analysis includes a buffer that can offset traffic congestion that may occur during an emergency evacuation and still maintain acceptable vehicle movement and evacuation times.
- Offsite Road Improvements: The proposed project would improve Paraiso Springs Road from its boundary to its intersection with Clark Road by providing minimum road widths of 20 feet for 98 percent of the 7,490 foot road with a small area of 150 feet where topographical constraints would result in an 18 foot wide road, and installing safety signage, delineators and centerline striping where feasible. These improvements create an access road that allows for effective evacuation and emergency access.
- Project Population Impact on Evacuation Traffic: The analysis determined that approximately 275 vehicles may be leaving the proposed project site during an evacuation. Concurrent evacuations of the proposed project population and local residents/vineyard staff could increase evacuation times by 3 to 4 minutes, which is still an acceptable evacuation time. As a part of the project's emergency preparation plan, project employees would assist in evacuation efforts along

Paraiso Springs Road. The addition of approximately 275 vehicles associated with the proposed project may increase evacuation time along Paraiso Springs Road for existing residents and vineyard workers but would not be expected to adversely impact the ability to move people from the area in acceptable timeframes.

- Evacuation Contingency Plan: The analysis determined that temporary refuge during a wildfire or other emergency provides a contingency option that increases overall safety by avoiding the limitation of relying only on evacuation during an emergency. The ability to temporarily refuge visitors, staff and firefighters on site would be available to project emergency managers should evacuation via Paraiso Springs Road be considered unsafe or less desirable.
- Dead End Road Length: The analysis determined that the dead end road length allowances within Title 14 Fire Safe Regulations, Article 2, were based on conditions where readily available fuels were situated along the roadways and where buildings were built within the fuels (e.g., scattered homes/buildings in a wildland urban intermix condition). Such conditions partially exist along Paraiso Springs Road where approximately 1 mile of travel includes natural or unmaintained fuels along the roadside. Beyond that point, agricultural, primarily vineyard fields, occur and present a considerable fuel break with low potential for ignition and fire spread. Roads on the proposed project site would comply with all state and local laws, including state Public Resources Code (PRC) section 4290. As identified by the California Board of Forestry and Fire Protection (Edith Hannigan, Land Use Program Manager, California Board of Forestry and Fire Protection – email to Mike Novo, Monterey County Planning, May 3, 2019), Paraiso Springs Road is a county maintained road built in the 19th century and is not subject to PRC 4290 dead end road requirements. However, the project is mitigating for this single access road into the project site with road improvements for evacuation and emergency access vehicles as well as numerous onsite fire protection measures. These measures are proposed to provide the same practical effect for meeting the intent of the code, to provide for project site safety, and are identified in the Fire Protection Plan (Dudek 2019, 2019 RDEIR Appendix 2). Mitigation Measure 3.7-6a is applied as if PRC 4290 did apply to Paraiso Springs Road. Although PRC section 4290 dead end road requirements are not applicable to the offsite Paraiso Springs Road, the proposed project would comply by providing onsite measures that provide the same practical effect, as allowed in California Code of Regulations, Title 14, section 1270.07.
- Emergency Response: The analysis determined that the closest fire station (Station 37) could reach the project site entrance in a travel time of just over 15 minutes based on Insurance Services Office (ISO) standards, which substantially conforms to the County's 1982 General Plan encouragement of development being within a 15 minute timeframe from Fire Station 37. Calculated call volumes for the proposed project would not be expected to impact current response capabilities with a calculated increase in the daily call rate from 4.4 calls to less than 4.5 calls per day (Dudek 2019).

Recommendations in the project's Fire Protection Plan (Dudek 2019) would also further reduce project-related impacts and enhance emergency response and evacuation efforts. These measures exceed minimum code and policy standards and are included in Mitigation Measure 3.7-6a.

Mitigation Measures

MM 3.7-6a The Fire Protection Plan shall be subject to review by the Mission Soledad Rural Fire Protection District, and approval by the RMA Director, prior to clearance of any vegetation or issuance of permits for construction, whichever occurs first. The applicant shall implement the approved Fire Protection Plan. The Fire Protection Plan shall include the following or equivalent measures, as determined through the approval process:

- Provide a facility Fire Safety Coordinator(s) to oversee implementation of fire protection and safety and overall fire coordination with MSRFPD/CAL FIRE
- Coordinate an annual fire evacuation drill/fire exercise to ensure proper safety measures have been implemented, facility awareness and preparation of facility-wide "Ready, Set, Go!" plan, consistent with the Monterey County Community Wildfire Protection Plan.
- Provide trained security staff 24/7, 365 days per year at the guard gate who are trained to manage an evacuation of the facility by opening the gates and directing traffic out of the area.
- Provide a first-responder (EMT) level staff person and equipment to be on-site at all times.
- Provide a customized one-ton, 4x4 pickup with a skid mounted pump and up to 150 gallon water tank. Multiple staff members and the site security staff should be trained to utilize this apparatus for the purposes of providing initial suppression for any vegetation ignitions, and initial response to other fires.
- Designate one or more structures to house the projected population and to include additional hardening to be designated a temporary refuge area (TRA).
- Provide ember-resistant vents for all ventilation for project structures.
- Provide a site-wide Public Address (PA)/Intercom system for emergency notifications.
- Prepare and practice site-wide evacuations following the "Ready, Set, Go!" program guidelines.
- Prepare an Emergency Preparation Plan that considers pre-fire planning, post-fire recovery, reporting, training, prevention, and communications procedures,
- Enhance traffic flow by not constructing speed bumps/humps and provide an automatic opening device for fire and law enforcement at the entrance gate.
- Restrict vegetation around temporary refuge area buildings to highly ignition resistant vegetation planted at low densities and maintained free of all accumulated debris/litter.
- Design and implement a landscaping plan consistent with accepted wildland urban interface fire safe/fire adapted practices.
- If planted, manage the vineyard in an irrigated, maintained condition to act as a modified fuel buffer.
- Conduct an annual inspection of the site by MSRFPD or its designee to ensure that project landscaping is maintained in a wildfire-safe condition.

- Maintain a 1- to 3-foot landscape-free area adjacent to all building structures' foundations to prevent available fuels for embers at the building base.

MM 3.7-6b Implement and maintain fuel treatment areas along project roads. Fuel treatment areas shall measure 20 feet in width (horizontal) as measured from the edge of the paved surface and shall occur on both sides of the road. Maintenance of roadside treatment areas shall be conducted according to the standards outlined in Monterey County Code Chapter 18.09 (Fire Code), Section O109.1.

Exacerbate Wildfire Risks, Which May Then Expose Occupants to Pollutant Concentrations From A Wildfire or Uncontrolled Wildfire Spread

Impact 3.7-7:	Implementation of the proposed project may exacerbate wildfire risk. This is considered a potentially significant impact. (Less than Significant with Mitigation).

Wildfire Risk

No substantial evidence of a commercial resort exacerbating wildfire risk has been found. Substantial evidence has been found that increased residential use in wildland areas exacerbates fire risk. A commercial project allows a trained staff to provide fuel management and other fire safe techniques around and on a commercial property. However, with wildfire risk being important in these high hazard zones, and a concern for the safety of occupants, neighbors and firefighters, the County is assuming that wildfire risks could increase from the proposed project, as described in this section.

Construction and operation/maintenance of the proposed project would involve the use of flammable materials, tools, and equipment capable of generating a spark and igniting a wildfire. Additionally, increased vehicle traffic and human presence in the project area could increase the potential for wildfire ignitions during operations/maintenance. The potential for the project to exacerbate wildfire risks to project occupants/staff and local residents during construction and operations/maintenance phases is discussed below.

Construction

As described, the proposed project area is located within a HFHSZ and VHFHSZ and heat or sparks from construction equipment, vehicles, as well as the use of flammable hazardous materials, have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low humidity and high wind speeds. The following construction-related equipment has the potential to generate heat or sparks that could result in wildfire ignition:

- Earth-moving and excavating equipment – Heated exhausts or sparks may result in ignition.
- Chainsaws and other small gas-powered equipment/tools – may result in vegetation ignition from overheating, spark, fuel leak, etc.
- Tractors, graders, mowers, bulldozers, backhoes, cranes, excavators, trucks, and vehicles – heated exhaust in contact with vegetation may result in ignition.
- Welders – Open heat source may result in metallic sparks coming into contact with vegetation.

- Wood chippers – Include flammable fuels and hydraulic fluid that may overheat and spray onto vegetation with a hose failure.
- Grinders – Sparks from grinding metal components may land on a receptive fuel bed.
- Torches – Heat source, open flame, and resulting heated metal shards may come in contact with vegetation.

The potential risk of wildfire ignition and spread associated with construction of the proposed project can be managed and pre-planned so that the potential for vegetation ignition is reduced. In addition, pre-planning and construction personnel fire awareness, reporting, and suppression training not only results in lower probability of ignition, but also in higher probability of fire control and extinguishment in its incipient stages. Data indicate that 95% of all wildfire ignitions are controlled during initial attack (Smalley 2008).

Additionally, measures that would help reduce construction-related wildfire impacts to a less than significant level include having adequate water available to service construction activities, implementing a construction-phase fire prevention plan, providing proper wildfire awareness, reporting, and suppression training to construction personnel, and requiring that all construction-phase components of the fuel modification be fulfilled prior to delivery of combustible materials/lumber drop to the project site. Implementation of mitigation measures MM 3.7-7a and MM 3.7-7b would reduce construction-phase impacts to a less than significant level.

Operations and Maintenance

Operations and maintenance of the proposed project would necessitate the use of flammable materials and powered tools and equipment periodically, all of which have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low humidity and high wind speeds. Creation of defensible space areas surrounding all structures and installation and maintenance of project landscaping would reduce fuel loads and readily-ignitable flashy fuels (grasses) and increase spacing between retained vegetation. This managed vegetation condition within and surrounding the developed portion of the project would minimize the potential for wildfire ignition and spread. Implementation of firesafe maintenance practices (MM 3.7-7c) and development and implementation of an operations-phase fire prevention plan (MM 3.7-7d) would further reduce operations phase impacts to a less than significant level.

Occupant Exposure

The proposed project has identified a daily population of approximately 500 people at full buildout with 100 percent occupancy, including staff and visitors. Given the project site's location in a HFHSZ and VHFHSZ, several fire protection systems have been included in the proposed project design or are otherwise required through relevant codes and standards. Fire protection systems for the proposed project that serve to minimize occupant exposure to wildfire impacts include:

- Installation of a fire hydrant network, a dedicated fire water pipeline system, a 500,000-gallon water supply tank, and appropriate hose connections (CH2MHill 2005)).

- Construction according to the latest ignition resistant building codes found in PRC 4290 and Chapter 7A of the California Building Code, as adopted by Monterey County, and any additional restrictions or requirements adopted locally by the MSRFPD.
- Installation of sprinklers in all structures designed by a licensed Fire Protection Engineer. A commercial sprinkler system supplied by the fire water pipeline system and 500,000 gallon water supply tank would be provided for the Hotel/Spa Resort complex. Built-in fire sprinklers for timeshare units would be connected to the potable water system.
- Installation and maintenance of defensible space areas within 100 feet of all project structures to reduce the potential for extreme fire behavior adjacent to developed areas and provide a working area for firefighters to conduct suppression activities.
- Installation of 12 foot-wide (minimum) on-site access roads, vehicle turnarounds, and bridges meeting appropriate loading standards.

Additionally, the technical analysis conducted in support of the proposed project (Fire Protection Plan (Dudek 2019)) considered potential occupant exposure and identified management recommendations that exceed minimum fire code and policy standards. A summary of these measures is presented under Impact 3.7-6. Implementation of proposed project design features, applicable fire code and policy standards, and Mitigation Measures 3.7-6a (implementation of Fire Protection Plan (Dudek 2019) recommendations), 3.7-6b (roadside fuel management), 3.7-7c (firesafe maintenance practices), and 3.7-7d (operations fire prevention plan) would reduce wildfire exposure impacts to a less than significant level.

Local Resident/Staff Exposure

The proposed project has identified certain components or design features intended to minimize occupant exposure to wildfire impacts. Additionally, mitigation measures have been identified to further reduce wildfire impacts to project occupants. Implementation of Mitigation Measures 3.7-7a through 3.7-7d will also reduce project-related wildfire impacts to local residents and vineyard staff to a less than significant level by reducing the likelihood of project-related ignitions. Certain project features will also help minimize wildfire impacts to local residents and vineyard staff and include:

- Installation and maintenance of project landscaping and defensible space areas around structures and roads will create a larger area of managed, irrigated, and maintained vegetation on the project site than currently exists. This will create a larger fuel break in the project area, would provide a working area for firefighters to conduct suppression activities, and would slow a fire burning eastward from the Sierra de Salinas range/Los Padres National Forest.
- Installation of a fire water system would assist in early suppression of on-site structure fires, should they occur.
- Completion of off-site road improvements along Paraiso Springs Road would facilitate fire apparatus response or evacuation egress during an emergency.
- Completion of a temporary refuge area for use during a wildfire emergency, which can be utilized by local residents in the event of an emergency.

Increased Risk from Locating New Development in a High Fire Severity Zone

While it is true that humans are the cause of most fires in California, there is no data available that links increases in wildfires with the development of ignition resistant communities.

Based on its location in a HFHSZ and a VHFHSZ, the Proposed Project is required to provide for a level of planning, ignition resistant construction, access, water availability, fuel modification and construction materials and methods that have been developed specifically to allow safe development within these areas. The Project meets and exceeds these requirements and based on the fire protection designs and measures integrated into the Proposed Project, which reduces potential for fire ignitions, the potential fire risk to existing residents in the area is not expected to increase. The Project would provide an up-canyon fuel break, positively affecting down-canyon residents by slowing fire spread. This type of development with an unbroken landscape (as opposed to low density wildland urban intermix projects) has been found to perform well against wildfires (Syphard, et. al, USGS Research 2015: Fires at the Wildland Urban Interface: Lessons from Southern California; Institute for Business & Home Safety, BHS Mega Fires: The Case for Mitigation 2008).

As detailed in the Fire Protection Plan, the Proposed Project will include a comprehensive fire protection system that employs land use planning, site design, and ignition resistant material and methods to minimize fire risk and result in a fire hardened project. This same robust fire protection system that protects the Proposed Project's structures, persons and property, also provides protections from on-site fire spreading to off-site vegetation. Accidental fires within the landscape or structures in the Proposed Project will have limited ability to spread. The landscape throughout the Proposed Project and on its perimeter will be highly maintained and much of it irrigated, which further reduces its ignition potential. Structures will be highly ignition resistant on the exterior and the interiors will be protected with automatic sprinkler systems, which have a very high success rate for confining or extinguishing fires. Additionally, future staff and visitors will enhance the wildfire detection network within the Project Area by providing additional fire-aware persons in the area. The Project will employ the fire adapted community strategies with a strong outreach program that raises fire awareness among its staff and visitors. Finally, the proposed fire suppression capabilities at the site (Type VI engine with skid pump) would reduce the initial response time to wildfire ignitions and increase the likelihood of successful initial attacks that limit the spread of wildfires.

The Project's presence would include an increase in the number of people in the area. However, the Proposed Project has been analyzed and designed to minimize the likelihood that an ignition occurs on site, and if it did, that it would escape the site. The Project will provide an ignition resistant landscape that essentially breaks up fuel continuity, provides operational advantages, including anchor points (an advantageous location from which firefighters can start building a fire line), and offers temporary refuge for existing residents and firefighters as well as widens Paraiso Springs Road. Roadways are consistently some of the highest ignition points for wildfires. The additional Project related traffic using Paraiso Springs Road introduces additional potential ignition sources along the roadway. However, the road widening and paving creates a more suitable access road and provides additional space between vehicles within travel lanes, provides a road surface that can support the imposed loads of vehicles and responding fire apparatus and in addition the ability to provide a fast response from the

site with the Type VI fire engine that would be on the project site at all times, would minimize the likelihood of a vegetation fire. Data indicate that 95% of all wildfire ignitions are controlled during initial attack (Smalley 2008). Off-site land uses further reduce the likelihood of vegetation fire given the large areas that are irrigated agricultural/vineyard uses, which are also resistant to ignition. Implementation of Mitigation Measures 3.7-7a through 3.7-7d will also reduce project-related wildfire impacts to local residents and vineyard staff to a less than significant level by reducing the likelihood of project-related ignitions, including from Project vehicles.

Mitigation Measure

MM 3.7-7a Implement all construction-phase fuel modification components from the approved Construction Fire Prevention Plan (see MM 3.7-7b) prior to removal of vegetation or combustible building materials being delivered to the site, as applicable.

MM 3.7-7b The applicant shall develop a Construction Fire Prevention Plan that addresses training of construction personnel and provides details of fire-suppression procedures and equipment to be used during construction. The Construction Fire Prevention Plan shall be subject to review by the Mission Soledad Rural Fire Protection District, and approval by the RMA Director, prior to clearance of any vegetation or issuance of permits for construction, whichever occurs first. Information contained in the plan shall be included as part of project-related environmental awareness training. At minimum, the plan shall include the following or equivalent measures:

- Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, use of spark arrestors, and hot work restrictions;
- Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days;
- Adequate water supply to service construction activities;
- Fire coordinator role and responsibility;
- Worker training for fire prevention, initial attack firefighting, and fire reporting;
- Emergency communication, response, and reporting procedures;
- Coordination with local fire agencies to facilitate agency access through the project site;
- Emergency contact information;
- Demonstrate compliance with applicable plans and policies established by state and local agencies.

MM 3.7-7c Maintenance of project buildings, grounds, and infrastructure, including defensible space areas, shall be conducted using firesafe practices to

minimize the potential for wildfire ignitions resulting from equipment use. Firesafe practices shall be consistent with California Public Resources Code Sections 4427, 4428, 4431, and 4442. Infrastructure maintenance activities shall be ceased during periods of high fire hazard (e.g., red flag warnings), except where necessary to maintain water supply for fire suppression purposes. This requirement shall be included in the project's operational manual (MM 3.7-7d).

MM 3.7-7d The applicant shall develop an Operations Fire Prevention Plan that addresses policies and procedures for minimizing wildfire potential. The Operations Fire Prevention Plan shall be subject to review by the Mission Soledad Rural Fire Protection District, and approval by the RMA Director, prior to issuance of occupancy permits or final inspection, whichever occurs first, for any habitable structures. The plan shall include the following:

- Procedures for minimizing potential ignition during maintenance activities;
- Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days;
- Fuel modification zone and landscape area maintenance procedures, including timing of work to reduce the likelihood of ignition and/or fire spread;
- Communication and reporting procedures with MSRFPD;
- Fire safety coordinator role and contact information;
- Applicable recommendations included in the project's Fire Protection Plan (MM 3.7-6a).

Exacerbate Wildfire Risks Due To Infrastructure

Impact 3.7-8:	Implementation of the proposed project may exacerbate fire risk associated with installation and maintenance of project-related infrastructure. This is considered a potentially significant impact. (Less than Significant with Mitigation)

Infrastructure required for development of the proposed project is discussed in detail in Section 2.4 (Project Description). The following identifies proposed project infrastructure and its contribution to wildfire risk:

- Potable and Recycled Water Supply: Two wells would supply necessary potable and recycled water, with the second well serving as a back-up supply. Recycled water would be used to irrigate project landscaping. This water supply is not intended for fire hydrants or structure sprinklers (this supply is discussed below). Any maintenance needed on either well would not result in additional temporary or permanent impacts beyond those identified in the 2018 RDEIR and 2019 RDEIR ("this EIR"). Implementation of Mitigation Measure 3.7-7c during maintenance of these features would reduce potential wildfire impact to less than significant.

- Wastewater Management: A wastewater treatment facility would be constructed at the eastern end of the project site, near the entrance and downhill from the main resort area. Recycled water would be stored underground on-site and used for landscape irrigation. If unavailable, landscape irrigation water would come from the project's potable supply. Installation of the wastewater treatment facility would not result in additional temporary or permanent impacts beyond those identified in this EIR. Implementation of mitigation measure MM 3.7-7c during maintenance of this area would reduce potential wildfire impact to less than significant.
- Stormwater Management: The project will install interceptor drainage ditches, debris basins, and vehicular/pedestrian bridges and will remove four existing culverts to manage storm and debris flows. These stormwater features are static, do not generate heat/sparks and would not impede site access or otherwise hinder evacuation or emergency response efforts. Installation of these features would not result in additional temporary or permanent impacts beyond those identified in this EIR. Implementation of mitigation measure MM 3.7-7c during construction and maintenance of these features would reduce potential wildfire impact to less than significant.
- Energy Conservation and Greenhouse Gas Emissions Reductions: The project would implement measures to conserve energy on site. Most of the identified measures occur within structures (e.g., low-flow water fixtures) or are programs to reduce waste (e.g., recycling program). Exterior measures (e.g., solar photovoltaic systems) would be installed to existing code standards. None of these measures would exacerbate wildfire risk or result in additional temporary or permanent impacts beyond those identified in this EIR.
- Fire Protection: The project would install a fire hydrant network, a dedicated fire water pipeline system, a 500,000-gallon water supply tank, and fire department hose connections at the hotel site. These features are static, do not generate heat/sparks and would not impede site access or otherwise hinder evacuation or emergency response efforts and availability of on-site fire water would reduce potential wildfire impacts. Installation of these features would not result in additional temporary or permanent impacts beyond those identified in this EIR. Implementation of mitigation measure MM 3.7-7c during construction or maintenance of these features would reduce potential wildfire impact to less than significant.
- Defensible Space: Defensible space would be required within 100 feet of the project's structures to reduce fire hazard on-site, consistent with state and county requirements. Defensible space zones are passive measures and would not impede site access or otherwise hinder evacuation or emergency response efforts. Presence of defensible space areas would reduce fuel volumes and moderate fire behavior near structures and would reduce potential wildfire impacts. Installation of defensible space areas would not result in additional temporary or permanent impacts beyond those identified in this EIR. Maintenance of defensible space areas may require heat-or spark-generating equipment thereby increasing wildfire risk. However, implementation of MM 3.7-6b (fuel treatment areas along project roads) and MM 3.7-7c (fire-safe maintenance practices) would reduce potential wildfire impact to less than significant.

- Power Lines: Project power lines would be installed below ground and would not exacerbate wildfire risk or result in additional temporary or permanent impacts beyond those identified in this EIR.

With implementation of Mitigation Measures 3.7-6b and 3.7-7c, wildfire impacts resulting from installation and maintenance of project-related infrastructure would be less than significant.

Increased Risk Associated with Runoff, Post-Fire Slope Instability, or Drainage Changes

Impact 3.7-9:	Implementation of the proposed project may increase risk associated with post-fire runoff, slope instability, or drainage changes. This is considered a potentially significant impact. (Less than Significant with Mitigation)

Wildfires can greatly reduce the amount of vegetation. Plant roots stabilize the soil and above-ground plant parts slow water, allowing it to percolate into the soil. Removal of surface vegetation resulting from a wildfire on a hillside reduces the ability of the soil surface to absorb rainwater and can allow for increased runoff that may include large amounts of debris. If hydrophobic conditions exist post-fire, the rate of surface water runoff is increased as water percolation into the soil is reduced (Moench and Fusaro 2012). The potential for surface runoff and debris flows therefore increases significantly for hillside areas recently burned by large wildfires (Monterey County 2015, Moench and Fusaro 2012).

As described in RDEIR Sections 2.4 (Project Description) and 3.6 (Geology and Soils), the surrounding hillsides above the proposed project are steep in many areas and are susceptible to erosion, landslides, and debris flow. CAL FIRE mapping data indicates moderate and high erosion potential in the hillside areas above the developed area of the proposed project (CAL FIRE 2009). RDEIR Section 3.6 also identifies that some slopes surrounding the proposed development area are prone to slope failure and have a high geologic hazard risk potential for landside and debris flow and that numerous debris avalanches and debris slides of varying ages are present on these slopes. It is expected that such conditions could be exacerbated in a post-fire landscape where surface vegetation has been removed (burned) and erosion potential increases.

The proposed project proposes to install interceptor drainage ditches on hillsides above the developed areas to deliver upland surface runoff around buildings, retaining walls, roadways, and other built structures. To manage potential debris flows and landslide impacts, up to five debris basins are also proposed at locations adjacent to proposed development sites. These debris basins will include a series of two-to-four small soil and rock check dams, approximately three-feet tall, constructed at the low flow line of the natural drainage feature. The debris basins would be constructed adjacent to proposed roadways, parking lots or maintenance paths to facilitate inspection and maintenance. The proposed project would also implement mitigation measure MM 3.8-2 which would require that a Civil Engineer prepare a final drainage plan to limit the 100-year post-development runoff rate to the County-identified 10-year pre-development rate. Additionally, Mitigation Measures 3.6-4a and b would ensure that the potential for landslide is reduced to a less than significant level by requiring preparation of a Final Geologic and Soil Engineering Feasibility Report prior to issuance of a grading permit.

Implementation of these project features and Mitigation Measures 3.8-2, 3.6-4a, and 3.6-4b are also expected to minimize potential flooding, runoff, or slope instability impacts that may occur post-fire. When combined with the post-fire inspection assessment identified in Mitigation Measure MM 3.7-9, potential impacts associated with post-fire flooding, runoff, or slope instability are considered less than significant.

Mitigation Measure

MM 3.7-9 Following any wildfire that burns onto the project site, a post-fire field assessment shall be conducted by an engineering geologist within 60 days of fire personnel allowing access to the site, to identify any areas that may be subject to increased risk of post-fire flooding, landslide or erosion. Any recommendations identified by the geologist to mitigate such risk shall be reviewed and approved by Monterey County RMA and implemented by the project applicant. This requirement shall be included in the project's operational manual.

As explained in 2018 RDEIR section 4.5.2, Cumulative Impacts Assumptions and Analysis, Hazards and Hazardous Materials, second paragraph, "[T]he proposed project would not combine with any planned growth in the area to form a hazards impact greater or more significant than the proposed project impact alone." No other significant development projects are proposed, or approved and not yet constructed, in the State Responsibility Area of the Sierra de Salinas mountain range. Potential cumulative impacts to exacerbating fire risk within the SRA are the same potential impacts of this project identified above.

Alternatives Section

RDEIR Section 5.1.3, Alternatives Eliminated from Detailed Analysis, is modified to read as follows:

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.

Two alternatives are eliminated as not being economically feasible, and not being consistent with a sufficient number of project objectives: a hotel only alternative and a 61 unit alternative. The resort, prior to its closure in 2003, had a number of configurations with up to 61 units, including mobile homes (RDEIR Figure 3.5-1) and hook ups for recreational vehicles. Camping and a yurt area were also provided.

For the hotel only alternative, the proposed project's 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. In addition, this resort is located in an area isolated from significant tourist destinations in Monterey County, making the economic risk of this project higher. Timeshare units have a higher average occupancy rate (CHMWarnick letter dated February 20, 2019; 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. The 61 unit alternative would not have sufficient size to allow the project to provide all the amenities necessary to become a destination resort. A project of that size would likely only be able to consist of hotel units and limited amenities, which makes financial feasibility difficult if not unlikely, as explained above. This makes the objective of providing an economically sustainable combination of hotel units and timeshare units infeasible. Most importantly from the lead agency's standpoint, both alternatives 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*. In addition, neither of these alternatives serves to reduce impacts on the only significant environmental impact of the project, even after mitigations imposed, which is the loss of historic structures. These alternatives would reduce the number of site users, leading to less people being informed of the site's history.

RDEIR Section 5.1.4, Alternatives Selected for Detailed Analysis, is modified to read as follows:

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

Alternative #5 – Timeshare Relocation Alternative

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 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.

Section 5.2.4.5, Alternative #5, Timeshare Relocation Alternative, is added to the RDEIR as follows:

5.2.4.5 Alternative #5: Timeshare Relocation Alternative

This alternative would relocate many of the timeshare condominium units to Indian Valley, relocate 13 Villa timeshare units to the timeshare hillside area on Lots 21 and 22, and redesign the Villa timeshare units to single story structures. This 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, reduce grading, reduce the visibility of development on the site from common public viewing areas, and relocate most of the lodging units closer to the project entrance for fire safety. This alternative would involve the following modifications to the site plan:

- Relocate the Villa timeshare units to the hillside between Paraiso Valley and Indian Valley (Lots 21 and 22). The Villa timeshare units would be redesigned as single story structures;
- 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;
- Relocate the timeshare condominium units on Lot 23 to Indian Valley in the location of the villa lots; and
- Relocate road alignment from hillside timeshares (northwest corner of Lot 22) to more directly connect the cul de sac to the rear of the hotel area rather than to the area vacated by the relocated timeshare condominiums on Lot 23 (reduces area of thirty percent slope encroachment and avoids High geologic hazard area)

The result of these changes would be the retention and relocation of the 60 timeshare condominium units and the relocation of 13 of the 17 timeshare Villa lots. A total of four Villa timeshare units would be eliminated. This results in a two percent reduction in visitor serving units being constructed on site (from 180 to 176). Elimination of these units results in a drop in the number of rooms from 310 to 298 (4%). The outcome would be reduction in height of development at higher and more visible locations, a smaller development footprint (elimination of development on proposed Lot 23) and related less environmental effects, a reduction in grading and development activities on steeper slopes, and location of units closer to the project entrance.

Impact Analysis

Aesthetics

The relocation of the timeshare Villas to the hillside would result in fewer visual changes to the project site from common public viewing areas. Fewer structures would be built; therefore, slightly fewer trees and other vegetation would be removed, and fewer sources of light and glare would be introduced within the project site. The timeshare condominiums on Lot 23, proposed for relocation, were in oak woodland. Their relocation leaves the forested area undeveloped, resulting in fewer native trees being removed. The relocation and height reduction of the hillside timeshare units to single story would allow existing topography and vegetation, as well as proposed landscaping, a better ability to reduce visibility of the proposed development from common public viewing areas.

It should also be noted that, 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, this alternative would reduce encroachment on slopes greater than 30 percent particularly on/near Lot 23 with the relocation and reduction in length of the hillside roadway. Under the proposed project, the condominiums on Lots 21 and 22 would be visible from Paraiso Springs Road. Relocation of these proposed two story units from the higher slopes of this hillside, and replacement with single story structures, would reduce the visual impact by incorporating single story units.

Lot 23 would then remain as undeveloped open space. 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 aesthetic impacts herein were found to be less than significant with mitigation measures as outlined in Section 3.1: Aesthetics and Visual Resources. However, this alternative would have fewer impacts on aesthetics, light, and glare than the proposed project with a reduction in development and vegetation removal, reduction in hillside grading for a road, and an emphasis on keeping the most visible development at lower height (single story versus the project's proposed two story units).

Air Quality

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 the Timeshare Relocation Alternative. In

addition, the reduction of the number of units developed would correspondingly reduce construction exhaust emissions associated with construction and operational 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. This alternative would have even 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

The Timeshare Relocation Alternative would result in fewer timeshare units and, subsequently, additional open space with the relocation of seven structures (14 units) from Lot 23, which is primarily oak woodland habitat. 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 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 alternative. The reduction of the number of units developed, relocating a proposed road off a steep hillside, and concentrating development on a smaller footprint, would reduce grading activities, which will reduce exhaust emissions associated with construction activities. The elimination of four 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. As such, this Timeshare Relocation Alternative would result in no change in comparison 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.

The Timeshare Relocation Alternative would result in slightly 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, except at the location of the proposed offsite road improvements. 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 Timeshare Relocation 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 Timeshare Relocation Alternative would result in similar potential impact in comparison to the impacts of the proposed project. While the development footprint is being reduced, recorded sites are not found in the area being eliminated, resulting in the expectation that impacts would be similar.

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 Timeshare Relocation Alternative would result in a smaller construction footprint and fewer timeshare units in comparison to the proposed project. The relocation of the hillside road proposed to lead to Lot 23 would allow the road to avoid a High Geologic Hazard Potential area (designated 4S on RDEIR Figure 3.6-4, Relative Geologic Hazards).

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 timeshare relocation from Lot 23, and the relocation of the road to Lot 23, would result in less disturbance to 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. The Timeshare Relocation 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 long-term erosion, this alternative is viewed as having slightly 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 Timeshare Relocation Alternative would result in fewer timeshare units, less grading, and the provision 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 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 the Timeshare Relocation Alternative 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.

This alternative results in fewer timeshare units, which slightly reduces potential impacts to emergency evacuation and to wildfire. Potential impacts to wildfire risk from infrastructure installation and maintenance, and potential impacts related to increased risk associated with post-fire slope instability or drainage changes would be slightly less to the proposed project by eliminating one area of timeshare units.

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 Timeshare Relocation Alternative would reduce the number of visitor-serving units by approximately two percent. In the short-term, the Timeshare Relocation Alternative would reduce the required earthmoving activities that could otherwise 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 Timeshare Relocation Alternative would slightly reduce the number of visitor-serving units and reduce the length of one two-lane road. This alternative would slightly reduce impervious surfaces that would increase surface water runoff when compared to the proposed project. Therefore, this alternative would have slightly 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 Timeshare Relocation Alternative would slightly reduce the number of visitor-serving units. In the long-term, the Timeshare Relocation Alternative would reduce impervious surfaces and associated surface water

runoff and urban contaminants, as explained above, that have an adverse impact on surface water quality when compared to the proposed project. Therefore, this alternative would have slightly fewer long-term surface water quality impacts.

Long-term Water Supply

The proposed project would result in a reduction of groundwater flow 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 Timeshare Relocation Alternative would reduce the number of visitor-serving units, and therefore slightly reduce water demand. Gross water demand would be reduced by approximately 1.5 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 0.15 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 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 water needed for landscaping would likely be proportional to the wastewater generated by a Villa timeshare as landscaping around Villa timeshare units is more in proportion to the area of the structure. These two factors would essentially offset, leading to no substantial effect on the net water use reduction. The net water use reduction estimated above would be a reduction of approximately one percent. In the long-term, the Timeshare Relocation Alternative would reduce groundwater demand by up to one percent when compared to the proposed project. Therefore, this alternative would have slightly 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 off-site 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 Timeshare Relocation Alternative would reduce the number of visitor-serving units by approximately two percent, and, as explained above, reduce water demand by approximately one percent, nominally reducing the less than significant impact on neighboring wells. The reduction may not be measurable. In the long-term, the Timeshare Relocation Alternative would slightly reduce groundwater demand when compared to the

proposed project. Therefore, this alternative would have the same or fewer impacts on neighboring wells.

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 Timeshare Relocation Alternative would reduce the number of visitor-serving units by two percent and four percent of the available room count, and therefore slightly reduce water demand when compared to the proposed project. Therefore, this alternative would have slightly 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); 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 Timeshare Relocation Alternative would reduce the number of visitor-serving units by approximately two percent, and therefore slightly reduce irrigation needs or other uses that could increase salinity 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 Timeshare Relocation Alternative would reduce the number of visitor-serving units by approximately two percent, and therefore slightly reduce water demand when compared to the proposed project. Therefore, this alternative would have slightly fewer impacts to groundwater levels and associated wetland and riparian habitat.

Noise

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 Timeshare Relocation Alternative, four 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. However, the Timeshare Relocation Alternative would have slightly 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 the same related to outdoor activities that will remain on the site with the majority of the units 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 slightly less 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 four units (approximately two 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 four (approximately two 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 four (approximately two percent) and subsequently, slightly reduces the amount of impervious surfaces possibly requiring smaller detention facilities. It would therefore, have slightly 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 four (approximately two percent) and therefore, would result in less solid waste delivered to the landfill. Therefore, this alternative would have slightly 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 Timeshare Relocation Alternative would result in elimination of four proposed timeshare Villa units (approximately two percent of total units). Each of the Villa timeshare units generates 9.57 vehicle trips per day, not including credit for shuttle use. With credit for shuttle use, trip reduction would be approximately 35 vehicle trips per day (four units x 9.57 trips per unit – 6.25% shuttle credit). This alternative would result in approximately eight percent (35 divided by 406 trips per day) less traffic than the proposed project.

The project, as designed, does not require mitigation as no potentially significant environmental impacts were identified. The slight 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 eight parking spaces associated with the eliminated Villa timeshare units would result in development being within the same footprint as the development footprint shown on the tentative map, except the elimination of development on Lot 23 for the timeshare condominium units. Therefore, because the Timeshare Relocation 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 slightly fewer transportation and circulation impacts in comparison to the impacts of the proposed project.

Conclusion

The smaller footprint and slightly fewer timeshare units proposed by the Timeshare Relocation Alternative 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. The Timeshare Relocation Alternative would result in four fewer timeshare units, which would reduce the room count by 12 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.

Add the following text to 2018 RDEIR section 5.2.2, Alternative #2: Valley Floor Alternative One, Hazards and Hazardous Materials:

This alternative results in ten percent fewer timeshare units, which slightly reduces potential impacts to emergency evacuation and to wildfire. Potential impacts to wildfire risk from infrastructure installation and maintenance, and potential impacts related to increased risk associated with post-fire slope instability or drainage changes would be slightly less to the proposed project by eliminating one area of timeshare units.

Add the following text to 2018 RDEIR section 5.2.3, Alternative #3: Valley Floor Alternative Two, Hazards and Hazardous Materials:

This alternative results in 6.7 percent fewer timeshare units, which slightly reduces potential impacts to emergency evacuation and to wildfire. Potential impacts to wildfire risk from infrastructure installation and maintenance, and potential impacts related to increased risk associated with post-fire slope instability or drainage changes would be slightly less to the proposed project by eliminating one area of timeshare units.

Add the following text to 2018 RDEIR section 5.2.4, Alternative #4: Reduced Project Alternative, Hazards and Hazardous Materials:

This alternative results in 35.5 percent fewer visitor-serving units, which substantially reduces potential impacts to emergency evacuation and reduces potential impacts to wildfire. Potential impacts to wildfire risk from infrastructure installation and maintenance, and potential impacts related to increased risk associated with post-fire slope instability or drainage changes would be reduced compared to the proposed project due to less area being disturbed through the elimination of development areas for Phases 3 and 4.

RDEIR Table 5-1 is Amended to Add a Column for Alternative #5, Timeshare Relocation Alternative (see following pages)

Environmental Impact	Proposed Project	Alternative #5 Timeshare Relocation Alternative (Units Reduced by 2%--NEW COLUMN)
Aesthetics and Visual Resources		
3.1-1 Adverse effect on a scenic vista and degrade the visual quality of the project site.	Less than significant with mitigation	Less than significant with mitigation Reduced
3.1-2 New sources of light adversely affecting visual resources	Less than significant with standard condition of approval	Less than significant with standard condition of approval Reduced
Air Quality		
3.2-1 Short-term construction emissions	Less than significant with mitigation	Less than significant with mitigation Reduced
3.2-2 Potential exposure to asbestos and/or lead during demolition activities	Less than significant with mitigation	Less than significant with mitigation Similar
3.2-3 Long-term operational stationary and vehicular emissions	Less than significant	Less than significant Reduced
3.2-4 Carbon Monoxide	Less than significant	Less than significant Reduced
3.2-5 Exposure of sensitive receptors to unpleasant odors	Less than significant	Less than significant Reduced
3.2-6 Exposure of sensitive receptors to toxic air contaminants	Less than significant	Less than significant Reduced
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	Less than significant Reduced
3.3-2 Potential direct impact to special status species status bat species, Monterey dusky-footed woodrat, coast horned lizard, and burrowing owl.	Less than significant with mitigation	Less than significant with mitigation Reduced
3.3-3 Potential direct impacts to nesting birds.	Less than significant with mitigation	Less than significant with mitigation Reduced
3.3-4 Loss of potential jurisdictional wetland (0.40 acre, 7,771 linear feet).	Less than significant with mitigation	Less than significant with mitigation Similar
3.3-5 Impede wildlife movement	Less than significant	Less than significant Reduced
3.3-6 Removal of approximately 7.5 acres of coast live oak woodland habitat and up to 191 trees, including 185 protected oak trees.	Less than significant with mitigation	Less than significant with mitigation Reduced
Climate Change		
3.4-1 Generation of greenhouse gas emissions above net zero	No impact with applicant-proposed mitigation	No impact with applicant-proposed mitigation Similar
Cultural Resources		
3.5-1 2003 demolition of nine significant historic Victorian-era cottages.	Significant and Unavoidable, with mitigation	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	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	Less than significant with mitigation Similar
3.5-4 Potential to disturb, undiscovered archaeological resources or human remains.	Less than significant with mitigation	Less than significant with mitigation Reduced
Geology and Soils		
3.6-1 Seismic groundshaking potentially resulting in exposure of people to injury or death	Less than significant with mitigation	Less than significant with mitigation Reduced
3.6-2 Potential human safety hazards resulting from dynamic compaction	Less than significant with mitigation	Less than significant with mitigation Reduced
3.6-3 Potential human safety hazards from liquefaction and/or lateral spreading	Less than significant with mitigation	Less than significant with mitigation Reduced
3.6-4 Potential human safety hazards from potential landslides.	Less than significant with mitigation	Less than significant with mitigation Reduced
3.6-5 Short-term and long-term erosion with the potential to adversely affect water quality	Less than significant with mitigation	Less than significant with mitigation Reduced
3.6-6 Project site has a low potential for expansive soils	Less than significant with mitigation	Less than significant with mitigation Similar

Hazards and Hazardous Materials		
3.7-1 Use of hazardous materials during project operations	Less than significant	Less than significant Similar
3.7-2 Transport, use, or disposal of hazardous materials during construction activities	Less than significant	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	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	Less than significant with mitigation Similar
3.7-5 Possible release of hazardous materials in the soil during construction activities	Less than significant with mitigation	Less than significant with mitigation Reduced
3.7-6 Impact emergency response and evacuation efforts.	Less than significant with mitigation	Less than significant with mitigation Reduced
3.7-7 Project implementation may exacerbate wildfire risk	Less than significant with mitigation	Less than significant with mitigation Reduced
3.7-8 Project implementation may exacerbate fire risk associated with installation and maintenance of project-related infrastructure	Less than significant with mitigation	Less than significant with mitigation Reduced
3.7-9 Increased Risk Associated with Runoff, Post-Fire Slope Instability, or Drainage Changes	Less than significant with mitigation	Less than significant with mitigation Reduced
Hydrology and Water Quality		

3.8-1 Short-term Erosion and Water Quality	Less than significant with mitigation	Less than significant with mitigation Reduced
3.8-2 Long-term Surface Water Runoff	Less than significant with mitigation	Less than significant with mitigation Reduced
3.8-3 Long-term Surface Water Quality	Less than significant with mitigation	Less than significant with mitigation Reduced
3.8-4 Long-term Water Supply	Less than significant	Less than significant Reduced
3.8-5 Effect on Salinas Valley Groundwater Levels	Less than significant	Less than significant Reduced
3.8-6 Well Interference	Less than significant	Less than significant Reduced or Similar
3.8-7 Potential Spring Impact	Less than significant	Less than significant Reduced or Similar
3.8-8 Groundwater Quality	Less than significant with mitigation	Less than significant with mitigation Reduced
3.8-9 Wetland and Riparian Impact	Less than significant with mitigation	Less than significant with mitigation Similar
Noise		
3.10-1 Ground borne vibrations	Less than significant	Less than significant Reduced

3.10-2 Traffic noise at residences along Paraiso Springs Road	Less than significant	Less than significant Reduced
3.10-3 Non-traffic noise from project operations at residences along Paraiso Springs Road	Less than significant with mitigation	Less than significant with mitigation Similar
3.10-4 Short-term construction noise	Less than significant with mitigation	Less than significant with mitigation Reduced
Public Services and Utilities		
3.11-1 Increase wastewater flows and construction of treatment, distribution, and disposal facilities	Less than significant	Less than significant Reduced
3.11-2 Water exceeds public health standards for fluoride	Less than significant with mitigation	Less than significant with mitigation Similar
3.11-3 Possible construction of new or expanded stormwater detention facilities	Less than significant with mitigation	Less than significant with mitigation Reduced
3.11-4 Increase in solid waste generation disposed of in landfill	Less than significant	Less than significant Reduced
Transportation and Traffic		
3.12-1 Added vehicle trips to the vicinity roadway system	Less than significant	Less than significant Reduced
3.12-2 Roadway hazards	Less than significant	Less than significant Similar
Consistency with Project Objectives	Meets the project objectives	Meets the project objectives but to a lesser degree

Table 5-1 is Amended to Add Rows for Impacts 3.7-6 through 3.7-9, Wildfire

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%)
3.7-6 Impact emergency response and evacuation efforts.	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
3.7-7 Project Implementation may exacerbate wildfire risk	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
3.7-8 Project implementation may exacerbate fire risk associated with installation and maintenance of project-related infrastructure	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
3.7-9 Increased Risk Associated with Runoff, Post-Fire Slope Instability, or Drainage Changes	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