City of Salinas
COMMUNITY DEVELOPMENT DEPARTMENT
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ENVIRONMENTAL CHECKLIST FORM

This form is intended to assist the lead agency (e.g., the City of Salinas), pursuant to Section 15183 of the CEQA Guidelines and Section 21083.3 of the Public Resources Code, in assessing Projects Consistent with a General Plan, Community Plan, or Zoning Action for which a prior environmental impact report has been prepared and certified.

1. Project title: Tentative Map 2021-001 (TM 2021-001)

2. Lead agency name and address: City of Salinas, Community Development Department 65 West Alisal Street, Salinas, CA 93901

3. Contact person and phone number: Thomas Wiles, Senior Planner, (831) 758-7206

4. Project location: Assessor's Parcel Number (APN) 153-091-015-000

5. Project sponsor's name and address: Stonebridge Homes, c/o Hugh Walker, 1540 Constitution Boulevard, Salinas, CA 93905

6. General Plan Designation: Mixed-Use, Residential-High Density, Residential-Medium Density, Residential-Low Density, Public/Semipublic, Park, Open Space

7. Zoning: Neighborhood Edge A and B (NE-A and NE-B), Neighborhood General A, B, and C (NG-A, NG-B, and NG-C), Village Center A and B (VC-A and VC-B), Park (P), Open Space (OS) and Public/Semipublic (PS) with Central Area Specific Plan Overlay District (SP-11), and Flood Overlay (F) Zoning Districts.

8. Prior Environmental Document (s) Analyzing the Effects of the Project (including State Clearinghouse Number if assigned): Environmental Impact Report for Central Area Specific Plan (CASP) (SCH # 2017091022)

9. Description of project: A request to subdivide an existing 189.27-acre lot into 427 residential lots with an additional 10 park and open space lots (437 lots total)(portion of Central Area Specific Plan (CASP)) for a proposed total of 1,674 dwelling units.

10. Surrounding Land Uses/Existing Setting/Zoning Districts:

    North: Agricultural / Park (P), Open Space (OS) and Public/Semipublic Districts
    South: Residential, Park, and School / Parks (P), Public/Semipublic (PS), and Residential Low Density (R-L-5.5)
    East: Agricultural / New Urbanism Interim (SP-NI)
    West: Agricultural / Neighborhood Edge A and B (NE-A and NE-B),

Neighborhood General A, B and C (NG-A, NG-B, and NG-C), Parks (P)

11. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.): Cal Water Service Company (Cal Water), Alisal Water Corporation (ALCO), Monterey County Local Agency Formation Commission (LAFCO), Transportation Agency for Monterey County (TAMC), Monterey-Salinas Transit (MST), Monterey Bay Air Resources District (MBARD), California Department of Fish and Wildlife (CDFW), California Department of Transportation (CALTRANS – District 5), California Public Utilities Commission (CPUC), Regional Water Quality Control Board (RWQCB) – Central Coast Region, United Stated Army Corps of Engineer's (USACE), Alisal Union School District, Salinas Union High School District, Santa Rita Union School District.

12. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? This environmental checklist has been sent to the following California Native American tribes that are traditionally and culturally affiliated with the project area: Ohlone/Coastanoan-Esselen Nation, Amah Mutsun Tribal Band, Indian Canyon Mutsun Bank of Coastanoan, Xolon Salinan Tribe, Amah Mutsun Tribal Band of Mission San Juan Bautista, Torre Martinez Desert Cahuilla Indians, Coastanoan Rumsen Carmel Tribe, Amah Mutsun Tribal Bank, Esselen Tribe of Monterey County, and Santa Ynez Band of Chumash Indians – Tribal Elder's Council.

Introduction to CEQA Guidelines Section 15183 Checklist

In analyzing a proposed project, the City may consider whether one or more existing environmental documents (e.g., Environmental Impact Reports [EIRs])_already provide adequate analysis of potential environmental impacts of the proposed project. If an earlier analysis is used, an Initial Study checklist, sometimes with modifications compared with the standard format found in Appendix G of the CEQA Guidelines, can be used to: a) identify the earlier analyses and state where they are available for review; b) identify which effects were adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis; and c) describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

CEQA also allows a lead agency to avoid repeating analyses that were already provided in a certified EIR for a General Plan, community plan, or zoning action for a proposed project consistent with the approved General Plan, community plan, or zoning action. Public Resources Code section 21083.3 and its parallel CEQA Guidelines provision, section 15183, provide for streamlined environmental review for projects

consistent with such prior planning decisions.

Subdivision (a) of Public Resources Code section 21083.3 provides that "[i]f a parcel has been zoned to accommodate a particular density of development or has been designated in a community plan to accommodate a particular density of development and an [EIR] was certified for that zoning or planning action, the application of [CEQA] to the approval of any subdivision map or other project that is consistent with the zoning or community plan shall be limited to effects upon the environment which are peculiar to the parcel or to the project and which were not addressed as significant effects in the prior [EIR], or which substantial new information shows will be more significant than described in the prior [EIR]."

Subdivision (b) of section 21083.3 lays out similar principles for proposed projects consistent with previously approved General Plans for which EIRs have been certified. Under subdivision (b), if a development project is consistent with the general plan for which an EIR was certified, the application of CEQA shall be limited to effects on the environment that are "peculiar to the parcel or to the project" and that were not addressed as significant effects in the prior EIR, or which substantial new information shows will be more significant than described in the prior EIR.

Subdivision (d) of the statute further indicates that an effect of a project upon the environment shall not be considered "peculiar to the parcel or to the project," "if uniformly applied development policies or standards" have been previously adopted by the city or county, with a finding based upon substantial evidence, that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards would not substantially mitigate the environmental effect. CEQA Guidelines section 15183, subdivision (f), adds that "[w]here a city or county, in previously adopting uniformly applied development policies or standards for imposition on future projects, failed to make a finding as to whether such policies or standards would substantially mitigate the effects of future projects, the decision making body of the city or county, prior to approving such a future project pursuant to this section, may hold a public hearing for the purpose of considering whether, as applied to the project, such standards or policies would substantially mitigate the effects of the project." Under these provisions of CEQA, a project that is consistent with a General Plan that was adopted pursuant to a certified EIR, could be potentially partially or wholly exempt from further CEQA analyses.

Section 15183 provides more detailed guidance than can be found in Public Resources Code section 21083.3 itself. Section 15183, subdivision (b), provides that, for any proposed project that is consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified, the agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

(1) Are peculiar to the project or the parcel on which the project would be located;

(2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent;

(3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan, or zoning action; or

(4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

(State CEQA Guidelines Section 15183(b).)

Guidelines Section 15183, subdivision (c), further provides that "if an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards...then an additional EIR need not be prepared for the project solely on the basis of that impact." "[D]evelopment policies or standards need not apply throughout the entire city or county, but can apply only within the zoning district in which the project is located.... Moreover, such policies or standards need not be part of the general plan or any community plan, but can be found within another pertinent planning document such as a zoning ordinance." (Guidelines, § 15183, subd. (f).)

Reliance on EIR for Central Area Specific Plan

The Salinas City Council certified the Final EIR for the Central Area Specific Plan (CASP) on November 17, 2020. At the same time, the City Council also approved the CASP, rezoned the property subject to the CASP, and approved a Development Agreement. The action rezoning the subject property reclassified approximately 760 acres of land from "New Urbanism" interim zoning with a "Specific Plan" overlay district to the following: Neighborhood Edge A and B/Low Density Residential, Neighborhood General A, B, C /Medium Density Village Center A/High Density and Village Center B/ High Density and Mixed Use, Park, Open Space and Public/Semipublic for the Central Area Specific Plan. Because the CASP EIR also supported this rezoning action, the EIR qualifies as an EIR for a "zoning action" within the meaning of Public Resources Code section 21083.3 and CEQA Guidelines section 15183.

The CASP EIR, relying on Section 15183, relied for some environmental impact issues on the City's earlier Final EIR for the City's General Plan (Cotton Bridges Associates 2002) and Final Supplement for the Salinas General Plan Final Program EIR (EDAW/AECOM 2007). (See CASP Draft EIR, § 1.8, pp. 1.0-15 - 1.0-20.) As to those

issues, the CASP EIR summarized the prior analyses on the issues in question. These issues included the following broad categories or specific topics falling within broad categories: Aesthetics; Agriculture and Forest Resources; Geology and Soils; Hazards and Hazardous Materials; Land Use and Planning; Mineral Resources; Population and Housing; Recreation; and Transportation.

On Page ES-1, the CASP EIR stated that "[t]he City of Salinas (City) has determined that a program-level environmental impact report (EIR) is required for the proposed Central Area Specific Plan (herein the Specific Plan or Plan Area) Project (proposed project) pursuant to the requirements of the California Environmental Quality Act (CEQA). It is noted, however, that *the Specific Plan provides a very high level of design detail for certain components of the project. Where sufficient detail is available in the Specific Plan, a full project-level analysis is provided in this EIR.*" (Italics added.)

Environmental Factors Potentially Affected:

The Project could potentially result in one or more of the following environmental effects.

☐ Aesthetics	☐ Agricultural and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology/Soils	☒ Greenhouse Gas Emissions	☒ Hazards & Hazardous Materials
☒ Hydrology/Water Quality	☒ Land Use/Planning	☒ Mineral Resources
☒ Noise	☒ Population/Housing	☒ Public Services
☒ Recreation	☒ Transportation	☒ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation:

☒ I find that the proposed project ***WOULD NOT*** have any significant effects on the environment that either have not already been analyzed in a prior EIR or that are more significant than previously discussed, or that uniformly applied development policies or standards would not substantially mitigate. Pursuant to CEQA Guidelines Section 15183, CEQA does not apply to such effects. A Notice of Determination (Section 15094) will be filed.

☐ I find that the proposed project will have effects that either have not been analyzed in a prior EIR or are more significant than discussed in the prior EIR, and that no uniformly applied development policies or standards would substantially mitigate such effects. With respect to those effects that are subject to CEQA, I find that such effects ***WOULD NOT*** be significant and a ***NEGATIVE DECLARATION*** will be prepared.

☐ I find that the proposed project will have effects that either have not been analyzed in a prior EIR

or are more significant than discussed in the prior EIR, and that no uniformly applied development policies or standards would substantially mitigate such effects. I find that although those effects could be significant, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. ***A MITIGATED NEGATIVE DECLARATION*** will be prepared.

☐ I find that the proposed project would have effects that either have not been analyzed in a prior EIR or are more significant that discussed in the prior EIR, and that no uniformly applied development policies or standards would substantially mitigate such effects. I find that those effects WOULD be significant, and a project-specific ***ENVIRONMENTAL IMPACT REPORT*** is required to analyze those effects that are subject to CEQA.

Prepared by: Thomas Wiles, Senior Planner Dated: June 28, 2024

Signature: _____ Dated: 6/28/24

EVALUATION OF THE ENVIRONMENTAL IMPACT OF THE PROJECT:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parenthesis following each question. A "No Impact" answer is adequately supported in the referenced information sources show that the impact simply does not apply to project like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explaining where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) For the purposes of this checklist, "prior EIR" means the environmental impact report certified for a General Plan, Community Plan, or Zoning Action, as supplemented by any subsequent or supplemental environmental impact reports, negative declarations, or addenda to those documents.

4) Once the lead agency has determined that a particular physical impact may occur as a result of a proposed project, then the checklist answers must indicate whether that impact has already been analyzed in a prior EIR. If the effect of the project is not more significant than what has already been analyzed, that effect of the project is not subject to CEQA. The brief explanation accompanying this determination should include page and section references to the portions of the prior EIR containing the analysis of that effect. The brief explanation shall also indicate whether the prior EIR included any mitigation measures to substantially lessen that effect and whether those measure have been incorporated into the project.

5) If the projects would cause a significant adverse effect that either is peculiar to the project or the parcel on which the project would be located and was not analyzed in a prior EIR, or is more significant than what was analyzed in a prior EIR, the lead agency must determine whether uniformly applied development policies or standards that have been adopted by a city or county preparing the checklist (e.g., City of Salinas) would substantially mitigate that effect. If so, the checklist shall explain how the project's implementation of the uniformly applied development policies or standards will substantially mitigate that effect. That effect of the project is not subject to CEQA if the lead agency makes a finding, based upon substantial evidence, that the uniformly applied development policies or standards will substantially mitigate that effect.

6) If all effects of a project were either analyzed in a prior EIR or are substantially mitigated by uniformly applied development policies or standards, CEQA does not apply to the project, and the lead agency shall file a Notice of Determination following project approval (if such approval occurs).

7) Effects of a project that either have not been analyzed in a prior EIR, or that uniformly applied development policies or standards do not substantially mitigate, are subject CEQA. With respect to those effects of the project that are subject to CEQA, the checklist shall indicate whether those effects are significant, less than significance with mitigations, or less than significant. If there are one or more "Significant Impact" entries when the determination is made, a project-specific EIR is required. The detailed analysis within the project-specific EIR should be limited to those effects determines to be significant. Brief discussions of less than significant effects will suffice. (See CEQA Guidelines Section 15128.).

8) "New Less Than Significant Impact or New Impact Less Than Significant With Mitigation Incorporated" applies where the prior EIR does not adequately or fully address a newly identified impact and the incorporation of mitigation measures will reduce an effect of a project that is subject to CEQA from "Significant Impact" to a "Less Than Significant Impact." Where any such new impacts are identified, the lead agency must describe the mitigation measures, and briefly explain how those measures reduce the effect to a less than significant level. If the newly identified effects of a project that are subject to CEQA are less than significant with mitigation incorporated, the lead agency may prepare a mitigated Negative Declaration. If all of the effects of the project that are subject to CEQA are less than significant, the lead agency may prepare a Negative Declaration.

9) The explanations of each issue should identify:

    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than

significant.

CHECKLIST

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
1. AESTHETICS. Would the project:					
(a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒	☐
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒	☐
(c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒	☐
(d) Create a new source of substantial light or glare which would adversely	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
affect day or nighttime views in the area?					

Discussion

Responses (a), (b), (c), and (d): Visual resources are generally classified into two categories: scenic views and scenic resources. Scenic views are elements of the broader viewshed such as mountain ranges, valleys, and ridgelines that can be seen from a range of viewpoints, often along a roadway or other corridor. Scenic resources are specific features of a viewshed such as trees, rock outcroppings, and historic buildings. They are specific features that act as the focal point of a viewshed. The Final Environmental Impact Report, Salinas General Plan (Cotton Bridges Associates 2002) identified several scenic elements including the following:

- Citywide Aesthetics
- Gateways
- Views from Highway 101
- Urban/Agricultural Edges
- Architectural Resources

Of the scenic elements provided above, the CASP did not affect gateway areas to the City or views from Highway 101. These two topics therefore were not discussed further, in the CASP EIR, but the other three scenic elements are discussed below.

Citywide Aesthetics: As the CASP DRAFT EIR explained on Page 1.0-16, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) noted that General Plan buildout would allow development to occur in both vacant and underdeveloped portions of the community, and that the introduction/expansion of urban uses into these areas has the potential to interrupt views of natural features, open space, the hillsides, and agricultural resources, reducing the aesthetic value of these resources. Additionally, new development in the City was found to increase the amount of light and glare in the community, particularly in areas planned for nonresidential development, such as retail and general commercial. It was found that future development under the General Plan has the potential to change the visual character of

the City.

To minimize and mitigate the impacts on Citywide aesthetics, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) presented the following five mitigation measures: Mitigation Measure A1 requires the City to implement the City's Gateway Guidelines; Mitigation Measure A2 requires the City to strengthen and require compliance with the City's Design Guidelines; Mitigation Measure A3 requires the City to improve the Lighting Ordinance; Mitigation Measure A4 requires the City to implement landscaping requirements for all proposed projects; and Mitigation Measure A5 requires the City to review all discretionary projects for aesthetics impacts. The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) concluded that with the implementation of Mitigation Measures A1 through A5, the potential citywide aesthetics impact would be reduced to a less than significant level.

Subsequently, the *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that aesthetic impacts associated with the Future Growth Areas (FGAs), which includes the CASP, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002).

Any future development under the approved General Plan, which includes all development under the CASP, would be required to comply with the regulations, policies, and standards developed pursuant to the above-referenced General Plan mitigation measures. Implementation of the CASP, including individual tentative maps, will not result in any new significant adverse impacts beyond those addressed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). This CASP EIR utilized the earlier analysis of this topic provided in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) pursuant to the tiering requirements of CEQA. The CASP EIR addresses this topic in light of the previous impact conclusions in those certified EIRs.

Urban/Agricultural Edges: The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) noted that General Plan buildout will allow development to occur on and adjacent to land used for agricultural operations. The expansion of development into these areas may modify certain areas of the community that currently have distinct urban/agricultural edges.

To minimize and mitigate the impacts on Urban/Agricultural Edges, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) presented the following six mitigation measures: Mitigation Measure A1 requires the City to implement the City's Gateway Guidelines; Mitigation Measure A2 requires the

City to strengthen and require compliance with the City's Design Guidelines; Mitigation Measure A5 requires the City to review all discretionary projects for aesthetics impacts; Mitigation Measure A6 requires the City to encourage the maintenance and provision of buffers between urban and agricultural uses; Mitigation Measure A7 requires the City to continue to implement the Boronda Memorandum of Understanding, which directs growth away from the most productive farmland in the Salinas Planning Area; and Mitigation Measure A8 requires the City to encourage City centered growth through infill projects and incentives. The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) concluded that with the implementation of these mitigation measures, the potential urban/agricultural edge impacts would be reduced to a **less than significant** level.

Subsequently, the *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that aesthetic impacts associated with the Future Growth Areas (FGAs), which includes the Specific Plan Area, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002).

Any future development under the General Plan, which includes all development under the CASP and tentative subdivision maps under the CASP, will be required to comply with the regulations, policies, and standards developed pursuant to the above-referenced General Plan mitigation measures. Implementation of the CASP, including tentative maps thereunder, would not result in any new significant adverse impacts beyond those addressed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). The CASP EIR utilized earlier analysis of this topic provided in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) pursuant to the tiering requirements of CEQA. The EIR will addresses this topic in light of the previous impact conclusions in those certified EIRs.

Architectural Resources: The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) noted new development and rehabilitation projects may impact significant architectural resources in the community in two primary ways: 1) new development and rehabilitation projects may be proposed that would be architecturally and stylistically incompatible with existing architectural resources, detracting from the existing resources' aesthetic value and contributing to visual discontinuity in neighborhoods that have a concentration of significant architectural resources; and 2) new development and rehabilitation projects may be proposed that would result in the removal of significant architectural resources or that would modify the structure so that the aesthetic value of the structure is destroyed.

To minimize and mitigate the impacts on Urban/Agricultural Edges, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002)

presented the following three mitigation measures: Mitigation Measure A5 requires the City to review all discretionary projects for aesthetics impacts; Mitigation Measure A9 requires the City to expand participation in the California Main Street Program; and Mitigation Measure A10 requires the City to consider implementing a historic/architectural preservation program. The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) concluded that with the implementation of these mitigation measures, the potential urban/agricultural edge impacts would be reduced to a **less than significant** level.

Subsequently, the *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that aesthetic impacts associated with the FGAs, which includes the CASP, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002).

Any future development under the approved General Plan, which includes all development under the CASP (including tentative maps), would be required to comply with the regulations, policies, and standards developed pursuant to the above-referenced General Plan mitigation measures. Implementation of the proposed project, including tentative maps thereunder, would not result in any new significant adverse impacts beyond those addressed in the in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007).

Applicable Mitigation from Prior EIR (if any)

No mitigation is required. The General Mitigation Measures discussed above imposed duties on the City of Salinas, and not on individual property owners within the CASP.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
2. AGRICULTURAL RESOURCES. *Would the project:*					
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒	☐
(b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒	☐
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒	☐
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use	☐	☐	☐	☒	☐

Discussion

Responses (a), (b), (c), (d), and (e): As the CASP Draft EIR explained on Pages 1.0-16 and 1.0-17, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) noted that General Plan buildout would result in the conversion of 3,525 acres designated for agriculture to urban uses. Much of the conversion of the agricultural land within the City limits would be for urban uses and parks. *The Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) also indicates that General Plan buildout would result in agricultural activity in proximity to residential and other urban uses, which may result in conflicts between the uses. It is noted that agricultural activity can cause nuisances related to air quality and noise that may disturb surrounding development. Urban activities may also negatively affect nearby agricultural uses, as increased vandalism often occurs and the introduction of domestic animals may disturb certain agricultural activities.

The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) noted that the City would work to preserve important agricultural lands located to the south and west of the City and within the Salinas Planning Area, and as part of the General Plan process, the community of Salinas indicated that land designated for future growth outside the City limits should be minimized to protect the valuable agricultural resources. The FGAs were established in the north of Salinas, north of Boronda Road, and east of the Salinas Municipal Airport, which are all located away from the best agricultural lands in the south and west. The approved CASP itself and the proposed project are located within the North of Boronda Road Future Growth

Area, which is one of the areas specifically identified for future growth. *The Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) notes that a significant impact associated with the conversion of agricultural land in the Future Growth Areas (FGAs) to residential and other urban uses and potential compatibility issues are anticipated.

To minimize and mitigate the impacts from the conversion of agricultural land in the FGAs and potential compatibility issues, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) presented the following five mitigation measures: Mitigation Measure AG1 requires the City to continue to cooperate with the County of Monterey to implement the Greater Salinas Area Memorandum of Understanding (GSA-MOU), which directs City growth to occur generally to the north and east away from the most productive farmland; Mitigation Measure AG2 requires the City to give priority to redevelopment and infill projects that reduce development pressure on agricultural lands; and Mitigation Measure AG3 requires implementation of the "Right-to-Farm" Ordinance. This includes noticing residential development within 1,000 feet of an established agricultural operation that residents in the area may experience inconveniences and discomfort associated with the normal farming and grazing activities, such as noise and dust. The Notice specifically states that a variety of activities may occur that may be incompatible with the proposed development and that an established agricultural operation in full compliance with applicable laws, shall not be considered a nuisance due to changes in the surrounding area. The Notice also states that a person's right to recover under a nuisance claim against these activities may be restricted; and Mitigation Measure AG4 requires the City to encourage the provision and maintenance of buffers, such as roadways, topographic features, and open space, to prevent incompatibilities between agricultural and nonagricultural land uses.

The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) concluded that with the implementation of General Plan Mitigation Measures AG1 through AG4, the impacts on potential compatibility issues would be reduced to a less than significant level; however, while the impacts on agricultural conversion would be reduced to the extent feasible, a significant and unavoidable impact would remain related to the loss of important farmland. Mitigation AG5 specifically addressed Agricultural Land Conservation Easement Program, which states that the City will work with the County of Monterey, and other local jurisdictions, to create and implement an agricultural land conservation easement program including such measures as securing the dedication of easements or by paying a mitigation fee that could be used to purchase easements through a mitigation bank. Additionally, in 2006, the City Council adopted Resolution No. 19422, approving the Agricultural Land Preservation Program. The resolution adopted a per acre mitigation fee for agricultural lands currently designated by the California Department of Conservation's Farmland Mapping Program as "Prime" or "of Statewide Importance."

The City of Salinas certified the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002), adopted a statement of overriding

considerations relative to this significant and unavoidable impact, and approved the Salinas General Plan.

Subsequently, the *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that agricultural impacts associated with the FGAs, which includes the CASP, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002).

Any future development under the approved General Plan, which includes all development under the CASP and tentative maps approved thereunder, would be required to comply with the regulations, policies, and standards developed pursuant to the above-referenced General Plan mitigation measures. Implementation of the proposed project would not result in any new significant adverse impacts beyond those addressed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) *and Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). The conversion of prime agricultural land is an impact within the scope of the programmatic analysis in the Final EIR and Final Supplemental EIR for the General Plan (see CEQA Guidelines Sections 15168, subdivision (c), and 15183, subdivision (c)). Per the Final Environmental Impact Report for the Central Area Specific Plan dated November 17, 2020.

Response b): The Specific Plan Area is currently zoned Neighborhood Edge A and B (NE-A AND NE-B), Neighborhood General A, B and C (NG-A, NG-B, and NG-C), Village Center A (VC-A), Village Center B (VC-B), Park (P), Open Space (OS) and Public/Semipublic with Specific Plan Overlay and Floor Overlay districts; therefore, there are no conflicts with land zoned as farmland. The Specific Plan Area is not under a Williamson Act contract; therefore, there are no conflicts with Williamson Act contracts. With respect to agricultural resources, as per the Draft Environmental Impact Report for the Central Area Specific Plan (EIR) dated June 26, 2020, no further analysis beyond that found in the program EIR (2007 Final Supplement for the Salinas General Final Program EIR) was determined to be necessary. This conclusion applies to the proposed tentative subdivision map as well as to the CASP itself.

Responses c), d): The Specific Plan Area is currently zoned Neighborhood Edge A and B (NE-A AND NE-B), Neighborhood General A, B and C (NG-A, NG-B, and NG-C), Village Center A (VC-A), Village Center B (VC-B), Park (P), Open Space (OS) and Public/Semipublic with Specific Plan Overlay and Floor Overlay districts, and used exclusively for row crop/agricultural production; therefore, there are no conflicts with land zoned as forest land, timberland, or timber land production. The Specific Plan Area does not have any forest resources; therefore, there would be no loss of forest land or conversion of forest land to non-forest use. As stated above, with respect to agricultural resources, as per the Draft Environmental Impact Report for the Central Area Specific Plan (EIR) dated June 26, 2020, no further analysis beyond that found in the program EIR (2007 Final Supplement for the Salinas General Final Program EIR) was determined to be necessary. This conclusion applies to the proposed tentative

subdivision map as well as to the CASP itself.

Applicable Mitigation from Prior EIR (if any)

No mitigation is required. The General Mitigation Measures discussed above imposed duties on the City of Salinas, and not on individual property owners within the CASP.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable.

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
3. AIR QUALITY. *Would the project:*					
(a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒	☐
(b) Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒	☐
(c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒	☐
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒	☐

Discussion

Overall conclusion: The CASP EIR provides project-level detail with respect to the air quality effects of the proposed tentative subdivision map, in part due to the comprehensive character of the mitigation measures required to reduce air pollutant emissions. The tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the air quality impacts of the proposed tentative subdivision map.

Responses (a), (b), and (c),: Salinas lies within the North Central Coast Air Basin, which meets the federal standard for ozone levels but falls short of the higher State standards for ozone and PM10. Ozone is the primary constituent of smog and is formed in the atmosphere via a chemical reaction involving nitrogen oxides (NOx), volatile organic gases (VOC), and sunlight. The primary sources are motor vehicles, organic solvents, pesticides, and industry. The Monterey Bay Air Resources District (MBARD) oversees various air quality regulations and programs.

MBARD Board of Directors adopted the 2012-2015 Air Quality Management Plan in March 2017 which represents the latest edition of the 2012 Triennial Plan, which addresses NOx and reactive organic gasses (ROG) emissions as precursors to ozone. The air quality impact generated by the project is expected to be less than significant, because it will create less than a significant number of vehicle trips. As a part of the Planned Unit Development Permit (PUD) approval, it shall be required that the Applicant or successor in interest contact the MBARD regarding the potential requirement for a District permit for any standby engine/generators.

The revised CEQA Air Quality Guidelines prepared by the Monterey Bay Air Resources District, dated February 2008, stipulate maximum thresholds for air quality as follows:

a) Emit less than 137 lb/day of VOC's or NOx;
b) Directly emit less than 550 lb/day of CO or will not cause a violation of CO ambient air quality standards (AAQS) at existing or reasonably foreseeable receptors;
c) Not significantly impact traffic levels of service or will not cause a violation of CO or contribute 550 lb/day to an existing or projected violation at existing or reasonably foreseeable receptors;
d) Directly emit less than 82 lb/day of PM10 on-site or will not cause a violation of particulate matter, ten-micron diameter (PM10) AAQS or contribute 82 lb/day to an existing or projected violation at existing or reasonably foreseeable receptors;

e) Not indirectly generate PM10 along unpaved roads or will not cause a violation of PM10 AAQS or contribute 82 lb/day to an existing projected violation at existing or reasonably foreseeable receptors;

f) Directly emit less than 150 lb/day of sulfur oxide (SOx) or will not cause a violation of sulfur dioxide (SO2) AAQS at existing or reasonably foreseeable receptors.

Response (d): Consistent with Appendix G of the CEQA Statute and Guidelines, significant impact on the environment associated with air quality will occur it if generates emissions that will result in emissions (such as those leading to odors) that will affect a substantial number of people. While offensive odors rarely cause any physical harm, they can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and the MBARD. The general nuisance rule (California Health and Safety Code §41700) and Air District Rule 402 is the basis for the threshold.

Examples of facilities that are known producers of odors include: wastewater treatment facilities, chemical manufacturing, sanitary landfill, fiberglass manufacturing, transfer station, painting/coating operations (e.g. auto body shops), composting facility, food processing facility, petroleum refinery, feed lot/dairy, asphalt batch plant, and rendering plant. None of these facilities are permitted within the Specific Plan Area.

If a project proposes to locate receptors and known odor sources in proximity to each other, further analysis may be warranted. However, if a project would not locate receptors and known odor sources in proximity to each other, then further analysis is not warranted. Neither the CASP itself nor the proposed tentative subdivision map proposed to locate new sensitive receptors that could be exposed to odors in the vicinity; nor do the CASP or tentative map propose uses that would create odors that could expose receptors in the area. Air district Rule 402 prohibits any mobile or stationary source generating an objectionable odor, with the exception of odors emanating from certain agricultural operations. The California Health and Safety Code §41700 and Air District Rule 402 prohibit emissions of air contaminants from any source that cause nuisance or annoyance to a considerable number of people or that present a threat to public health or cause property damage. Compliance with these rules would preclude land uses proposed under the proposed project from emitting objectionable odors. Therefore, objectionable odors are unlikely to be produced by the project because no odor generating activities will be permitted within project area

The MBARD's *CEQA Air Quality Guidelines* provides a list of mitigation measures that would help the proposed project comply with the MBARD *2012-2015 AQMP*. The mitigation measures provided within this air quality discussion (i.e. throughout the impact analysis provided in Section 3.1: Air Quality of the Final Environmental Impact Report – Salinas Central Area Specific Plan dated November 2020) have been designed to be consistent with the Mitigation Measures provided in the MBARD *CEQA Air Quality Guidelines*, where applicable (see below). As approved, the Specific Plan is

expected to be built out under a staged approach, and all mitigation would be applicable to each stage. The proposed tentative map represents one such discrete stage. However, even with the application of mitigation measures, operational emissions levels (e.g. ROG, NOx, and PM10) would remain above the defined thresholds of significance. Exceedance of the threshold within an area designated as nonattainment would be a cumulatively considerable impact. As such, implementation of the Specific Plan would have a ***cumulatively considerable contribution*** and **a *significant and unavoidable*** impact on the region's air quality.

Applicable Mitigation from Prior EIR (if any)

The following Mitigation Measures for Air Quality stated in the adopted Final Mitigation Monitoring and Reporting Program from the Final Environmental Impact Report for the Salinas Central Area Specific Plan dated November 2020 shall be required for any future development in the project area, including the proposed tentative subdivision map:

Mitigation Measure 3.1-1: Prior to approval of tentative maps, conditional use permits or site plan review, the project applicant(s) shall incorporate the following features into project plans and specifications, as directed by the City of Salinas:

- Provide traffic calming measures (such as speed bumps, traffic circles, and/or other standard measures) on at least 50% of streets and intersections within the Plan Area;

- Require the parking lots or parking structures for new commercial, office, retail, and multifamily development to provide enough parking spaces for carpools and vanpools to accommodate reasonably foreseeable consumer demand at the time of the approval of such development, consistent with State of California laws and policies intended to encourage the use of carpools and vanpools;

- Require the use of low-VOC paint for all new building architectural coatings within the Plan Area, consistent with or better than, what is required by the City's Municipal Code.

Mitigation Measure 3.1-2: Prior to approval of development review permit(s), the project applicant(s) shall incorporate effective methods to facilitate the use of cleaner alternative fuel (e.g., electric vehicles, carpooling, etc.) within the Plan Area. Effective methods may include the installation of alternative fuel (e.g. electric) charging stations at locations spaced throughout the Plan Area including but not limited to those specified in this Draft EIR, as applicable, consistent with or better than what is required by the City's Municipal Code and Specific Plan. Additionally, this can be achieved by providing preferential parking for alternatively-powered vehicles, including electric cars, and/or by providing carpool/vanpool parking spaces.

Mitigation Measure 3.1-3: Prior to approval of development review permit(s), the project applicant(s) shall incorporate the use of alternative energy for the residential and mixed use/commercial developments, including by implementing alternative energy (e.g. PV solar) building requirements, consistent with or better than, what is required by the City's Municipal Code and State requirements (e.g. the 2019 California Solar Mandate). Project applicant(s) shall also ensure that pre-installed electrical hookups and/or charging stations, as applicable, are incorporated into all project plans and specifications.

Mitigation Measure 3.1-4: Prior to the issuance of building permits, the project applicant(s) shall provide plans that demonstrate that low-flow (high-efficiency) indoor water fixtures will be installed throughout the Plan Area, including for bathroom and kitchen faucets, toilet fixtures, and showers, in both residential and non-residential buildings, in compliance with or better than the standards required within the most recent version of the California Green Building Standards Code.

Mitigation Measure 3.1-5: Prior to the issuance of building permits, the project applicant(s) shall provide plans that demonstrate that water-efficient irrigation systems will be installed throughout the Plan Area, consistent with or better than the requirements contained within the State's Model Water Efficient Landscape Ordinance, the City's Water Conservation Ordinance and the Salinas Zoning Code Landscaping and Irrigation requirements.

Mitigation Measure 3.1-6: Prior to approval of improvement plans or development review permits, as applicable, the project applicant(s) shall ensure that pedestrian/bicycle facilities (e.g. pedestrian paths, outdoor bike racks, etc.) are provided within the Specific Plan Area, in coordination with and subject to approval by the City of Salinas. The project proponent shall also provide bicycling parking near the entrance to commercial establishments within the Specific Plan Area, consistent with or better than the requirements contained within the City's Municipal Code.

Mitigation Measure 3.1-7: Prior to the issuance of development review permit(s), the project applicant(s) shall incorporate the following additional Plan Area requirements, as applicable:

- Install secured bicycle storage facilities (bike lockers, cages, interior space, or similar as approved by the City Engineer) at all commercial and public facilities with 50 employees or more;

- Incorporate park-and-ride lots.

- Install Level 2 electric vehicle (EV) charge stations at workplace sites with 50 or more employees (10% or more of total available parking spaces, dependent on

the existing and anticipated overall electric vehicle fleet mix in Monterey County at time of development); and

- Install publicly-available dual post Level 2 charge stations within the VC or NG zones, and/or other zones as deemed acceptable by the City of Salinas. (Note: The 'level' of the charging station refers to the voltage that the electric vehicle charger uses. Level 1 charging is your Portable Cordset or Wall-mounted Charging Station (2-10 hours charging).

Mitigation Measure 3.1-8: Prior to the approval of individual phases (i.e. tentative maps, site plan review, etc.), the project applicant(s) shall develop a reasonably feasible offsite mitigation program that provides funding to offset the project-generated air emissions that are still above the Air District's operational criteria pollutant thresholds after the adoption of other applicable air quality mitigation measures. The offsite mitigation program is subject to the review and approval of the Air District and the City of Salinas on a project-by-project basis (of phase-by-phase), and is intended to be in addition to offsets that are obtained through any on-site mitigation measures. Example projects that could be included in the offsite mitigation program may include, but are not limited to, the following:

- Replace existing agricultural combustion-based generators/pumps with electric agricultural water pumps (in place of generators/pumps;
- Replace combustion school buses with electric school buses within the local community;
- Install adaptive traffic control systems;
- Install solar photovoltaic (PV) systems.

Mitigation Measure 3.1-9: Prior to the issuance of grading permits, the project applicant shall prepare a grading plan subject to review and approval by the City. In the event that ground disturbance exceeds 2.2 acres per day for initial site preparation activities that involve extensive earth-moving activities (e.g., grubbing, excavation, rough grading), and 8.1 acres per day for activities that involve minimal earth-moving (e.g., finish grading), the required grading plans shall include the following measures to be implemented as needed to prevent visible dust emissions:

- Water all active construction sites to prevent visible dust emissions. Frequency should be based on the type of operation, soil, and wind exposure;
- Prohibit grading and earthmoving activities, and cover stockpiles, during periods of high wind (over 15 mph);
- Limit vehicle speed on construction sites to 15 mph.

- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days);
- Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydroseed area;
- Maintain at least 1-foot of freeboard in each haul truck;
- Provide windbreaks on the windward perimeter of construction projects where adjacent to open land;
- Cover inactive storage piles;
- Sweep streets if visible soil material is carried out from the construction site; and/or
- Post a publicly visible sign written in English and Spanish which specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours. The phone number of the Monterey Bay Air Resources District (MBARD) shall be visible to ensure compliance with Rule 402 (Nuisance). The sign shall be in accordance with MBARD and/or City requirements, as applicable.
- Use cleaner construction equipment that conforms to EPA's second or first-most stringent Tier emission standards (e.g. Tier 3 or Tier 4 emission standards in 2019), or better; and/or
- Further, where reasonably feasible, construction equipment should include the use of alternative fuels such as compressed natural gas (CNG), propane, electricity or biodiesel.

Mitigation Measure 3.1-10: Prior to issuance of building permits or commencing operation of any commercial building/use that would emit toxic air contaminants (such as gas stations or dry cleaning operations), the project applicant shall, at a minimum, perform prioritization screening in accordance with the Air Toxics "Hot Spots" Program, Facility Prioritization Guidelines (July 1990) and the Air Toxics "Hot Spots" Information and Assessment Act. The prioritization screening shall be performed in accordance with the California Air Pollution Control Officers Association Air Toxic "Hot Spots" Program guidance. The prioritization screening shall also be conducted consistent with the guidance provided by the Monterey Bay Air Resources District, which will be responsible for determining which facilities, based on their prioritization screening score, must perform a health risk assessment. In determining the need to prepare a health risk assessment, the Monterey Bay Air Resources District considers the potency, toxicity, quantity, and volume of hazardous materials released from the facility, the proximity of

the facility to potential receptors, and any other factors specific to the facility that indicate that it may pose a significant health risk.

If a health risk assessment is warranted for a facility based on its prioritization score, the project applicant shall assess the facilities for the potential to expose the public to toxic air contaminants in excess of the applicable thresholds (utilizing an air dispersion modelling program such as AERMOD). As of the time of this writing, the commonly accepted threshold for cancer risk is 10 in a million for carcinogens, and the reference exposure level for non-carcinogens (HI = 1). Facilities that exceed the applicable threshold(s) have the potential to expose the public to toxic air contaminants levels that would be considered significant. Facilities that exceed the applicable threshold(s) must incorporate mitigation to reduce the risks from emission of toxic air contaminants to an acceptable level (i.e., to a level that does not exceed the applicable threshold[s]). Potential mitigation includes: reducing the size of the facility area; rearranging the site to reduce the potential for impacts on the nearest sensitive receptors; and utilizing products that reduce the level of toxic air contaminants, or removal of such products from the operational phase of the project.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
4. BIOLOGICAL RESOURCES. *Would the project:*					
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
Game or U.S. Fish and Wildlife Service?					
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒	☐
(c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒	☐
(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒	☐
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒	☐

Discussion

Overall conclusion. The CASP EIR provides project-level detail with respect to the biological resource effects of the proposed tentative subdivision map, in part due to the comprehensive character of the mitigation measures required to reduce air pollutant emissions. The tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the biological resource impacts of the proposed tentative subdivision map.

Responses (a), (b), (c), (d), (e), and (f): The City of Salinas is located in the middle portion of the Coast Range Geomorphic Province of California. The Coast Ranges are northwest-trending mountain ranges (2,000 to 4,000, occasionally 6,000 feet elevation above sea level), and valleys. The ranges and valleys trend northwest, subparallel to the San Andreas Fault. The geologic strata dips beneath alluvium of the Great Valley to the east. To the west is the Pacific Ocean. The coastline is uplifted, terraced and wave-cut. The Coast Ranges are composed of thick Mesozoic and Cenozoic sedimentary strata. The northern and southern ranges are separated by a depression containing the San Francisco Bay. The City of Salinas lies within the southern range.

The Specific Plan Area is located within the City of Salinas incorporated limits. However, a portion (approximately 85 acres of land) of the northwestern corner of the Specific Plan Area has not yet been annexed by the City. This land (along with the rest of the Plan Area) is located in the City's Sphere of Influence and has been included in

the Central Area Specific Plan for conceptual planning purposes. The Specific Plan Area is bounded by Natividad Road on the west, East Boronda Road (herein referred to as "Boronda Road") on the south, Old Stage Road and the future extension of Constitutional Boulevard on the east, and the future extension of Russell Road on the north. U.S. Highway 101 (U.S. 101) and North Main Street are located to the west. Unincorporated land under the jurisdiction of the County of Monterey abuts the Specific Plan Area to the north.

The majority of the Specific Plan Area is relatively flat, with the bluffs of the on-site creeks containing the greatest slope area. The bluffs vary from approximately five feet to 30 feet above the creek floodplains. The bluff's slopes range between 20:1 and 4:1 (horizontal to vertical). However, the actual creek banks do experience slopes steeper than 4:1 in some instances. A 25-foot-high terrace near the middle of the Specific Plan Area divides the two drainage basins. The Specific Plan Area generally slopes from a northerly to southerly direction towards Boronda Road. The overall topographic relief is approximately 76 feet, with a maximum elevation of approximately 146 feet above sea level at the northeast corner on Old Stage Road, and a minimum elevation of approximately 70 feet above sea level at Natividad Creek in the Boronda Road crossing.

The Specific Plan Area is currently being farmed and contains limited development. Most agricultural activity on-site and in the immediate vicinity has consisted of cultivation of various types of row crops. The Specific Plan Area has been heavily disturbed for years from agricultural practices. The Specific Plan Area is currently agricultural land, consisting of row crop agriculture. Two creeks cross through the Specific Plan Area: Gabilan Creek in the west and Natividad Creek in the east. Natividad Creek has three tributaries that connect onsite and continue south. Much of the Specific Plan Area has been heavily disturbed from its natural conditions as a result of years of cultivation. Urban development consists of several residences throughout the Specific Plan Area, several storage barns, a Pacific Gas & Electric (PG&E) substation near the northern boundary, and a drainage ditch near the eastern boundary. Three PG&E transmission lines are also located in the center of the Specific Plan Area.

Existing infrastructure is currently located along Boronda Road, Hemingway Drive, and Constitution Boulevard, including water, sewer, overhead electricity, storm drainage, and natural gas utilities. PG&E currently operates a 12 kV overhead power line along Old Stage Road and Williams Road. A 12 kV underground primary line exists along Boronda Road. PG&E also maintains 112 Kv transmission lines and corresponding easements along the northwest side of Old Stage Road, westerly along the proposed Russell Road alignment, and southerly down the middle of the Specific Plan Area. PG&E plans to install a substation near the intersection of the proposed Russell Road alignment and the central north to south transmission lines.

Land to the north of the Specific Plan Area is currently used primarily for agricultural production with some scattered residences along Old Stage Road. Further to the north

is the unincorporated community of Natividad, near the corner of the intersection of Old Natividad Road and Old Stage Road. Scattered residences and other non-residential uses are located within Natividad. These land uses are all located in the unincorporated area of Monterey County and are currently zoned F/40 (Farmlands, 40 acres per unit). Land to the east of the Specific Plan Area is currently used primarily for agriculture and is zoned New Urbanism Interim (with a Specific Plan Overlay District). This area is located in the North of Boronda Future Growth Area (FGA) and a Specific Plan (referred to as the East Area Specific Plan), comprised of approximately 929 acres, is planned for this area, however, no formal application has been submitted to the City for consideration to date.

The Specific Plan will have a mix of urban land uses, similar to those proposed for the Central Area Specific Plan. Development of the future East Area Specific Plan is expected to include approximately 4,000 dwelling units and supporting uses such as village center/commercial uses. comprised of approximately 929 acres. Across Boronda Road directly to the south are predominantly existing single-family and multifamily residential uses. Everett Alvarez High School is also located directly to the south of the Specific Plan Area. The land uses directly abutting the Specific Plan Area are zoned Low and Medium Density Residential and Public/Semipublic, respectively. Four elementary schools are also located further to the south. The majority of the larger area south of the Specific Plan Area is known as "Creekbridge". In addition, to the land uses previously noted above, a commercial/mixed use shopping center as well as office uses are also located in this area.

Across Natividad Road directly to the west, is area subject to the approved West Area Specific Plan. Though the property is presently used for agriculture, the portion of the West Area Specific Plan, which directly abuts the Plan Area is planned primarily for uses low and medium density residential uses, supplemental detention basins and a water well facility. These uses are zoned Neighborhood Edge\Low Density Residential, Neighborhood General\Medium Density Residential, Open Space and Public/Semipublic, respectively. A Specific Plan Overlay District is also applicable to the entire West Area Specific Plan Area. Located farther to the west (within the West Area Specific Plan) is the existing two existing schools: McKinnon Elementary School (Santa Rita Union School District), and the Rancho San Juan High School (Salinas Union High School District), both of which are located on property zoned Public/Semipublic.

The Specific Plan Area primarily consists of vacant farm fields that have been leveled for agricultural use. This area is currently being farmed and contains limited development. Most agricultural activity on-site and in the immediate vicinity has consisted of cultivation of various types of row crops. Other vegetation types include remnant patches of annual grassland and oak woodlands, ruderal (weedy) fields, riparian vegetation along Natividad Creek and its unnamed tributaries, and aquatic riparian habitat in irrigation ponds. There are a few trees located in the Specific Plan Area. The on-site trees include landscape trees, which are located in the western and

southern portions of the Specific Plan Area, and willow trees, which are located along Natividad Creek and its unnamed tributaries.

The majority of the Specific Plan Area is in intensive row-crop production. The Specific Plan Area is currently in agricultural production with periodic changes in crops and tilled land area. Figure 3.4-3 depict the areas in active agriculture (i.e., row-crops, tilled fields or greenhouses) as of July 2004. Typical crops include strawberries and lettuce. Wildlife use of agricultural fields is largely limited to opportunistic foraging by blackbirds, ground squirrels and hares, due to frequent disturbances from farming activities. However, the habitat values will vary depending on the frequency of disturbance, and crop type. For example, fallow fields may temporarily support a level of use similar to that of grasslands, when allowed two produce ruderal vegetation, and perennial crops, such as strawberry fields, may even support nesting by killdeer (*Charadrius vociferus*) and homed larks, which prefer the bare areas between the rows. The grassland habitat value in the Specific Plan Area is likely moderated due to the fragmented nature of the remaining habitat patches and management activities, such as disking. Representative species include ornate shrew, gopher, western harvest mouse, California meadow vole, California ground squirrel, black-tailed hare, American badger, striped skunk, coyote, red fox, red-tailed hawk, golden eagle, horned lark, western meadowlark, savanna sparrow, grasshopper sparrow, and gopher snake.

The Final EIR stated that even though there are numerous special-status invertebrates documented within the region, none are documented within the Specific Plan Area or vicinity. Based on field surveys, habitat conditions, and records searches, there are no special status invertebrate species that have the potential to be present within the Specific Plan Area. The CASP would not, directly or indirectly, have a substantial adverse effect on invertebrate species through habitat modifications or reductions, cause populations to drop below self-sustaining levels, substantially eliminate a community, or substantially reduce the number of, or restrict the range of, an endangered, rare or threatened species, including those considered candidate, sensitive, or special status in local or regional plans, policies, regulations, or by the CDFW or USFWS. Therefore, the CASP would have a ***less than significant*** impact on special-status invertebrate species. This same conclusion applies to the proposed tentative subdivision map.

There are numerous special-status amphibians and reptiles that are documented within the region. The Specific Plan Area was assessed for habitat to support special-status amphibians/reptiles. Based on field surveys and records searches, three species warranted a more detailed evaluation within the CASP EIR due to the habitat conditions including California tiger salamander (CTS) (*Ambystoma californiense*), California red-legged frog (CRLF) (*Rana draytonii*), and foothill yellow legged frog (FYLF) (*Rana boylii*).

Per the Final EIR, California Tiger Salamander (CTS) is documented in an agricultural basin located within the Specific Plan Area, as well as areas to the northeast and east

of the Specific Plan Area. The basin within the Specific Plan Area is 0.25 acres in size located on the east side of Natividad Road. There were 30 larvae observed on September 5, 2007. Twenty-two larval tail clippings collected for genetic testing indicated that the larvae are hybrids. This documented occurrence is a metapopulation of hybrid tiger salamanders.

The entire Specific Plan Area is within the 1.3 miles migration distance for CTS. There are also small microhabitats within the Specific Plan Area, some of which can provide habitat for CTS. The microhabitats include: farmland fringe (or edge), irrigation ditches, creek corridors, and areas farmland residence/structures. Higher quality upland habitat is found to the northeast and east in the foothill areas; however, the Specific Plan Area cannot be completely discounted as having potential refuge sites especially considering that there is a breeding site present. The paved roads, dirt roads, and tilled farmland provide limited habitat because of the frequency of disturbance in these areas.

It is noted that this population has been genetically evaluated and has been determined to be a hybrid population and is not a distinct population segment (DPS). The Final EIR includes mitigation measures that require consultation with the regulatory agencies to ensure that there is no illegal take for CTS. Additionally, the regulatory agencies have established avoidance, minimization, and mitigation measures that they impose on projects through the regulatory permitting process. These measures require activities to avoid and minimize impacts to CTS. Examples of standard avoidance and minimization measures include: 1) conducting environmental education training for all construction personnel, 2) having a biologist with a scientific collecting permit for CTS to be responsible for overseeing any hand excavation of burrows using hand-trowels and spades per the regulatory agency protocols, 3) erecting drift fencing around the work areas if occurring during the migration/breeding season, 4) inspection of drift fencing by biologist with a scientific collecting permit every 72 hours during the migration/breeding season 5) installation of pit traps to capture CTS migrating during the rain events with a check twice daily (morning prior to construction start and evening after construction ends), 6) relocation of any CTS found immediately to a site designated by the USFWS and CDFW per protocol; and 7) post construction report.

The regulatory agencies may also require compensatory mitigation for any take, including habitat loss. This is anticipated to apply to the loss of the aquatic breeding site within the basin along Natividad Road. The regulatory agencies are anticipated to require dewatering of the basin during the aestivation period when the CTS is not present in the basin. After the basin is dewatered, it could be decommissioning entirely. This process would ensure that no CTS is directly impacted; however, they will be indirectly impacted given that the basin would no longer be available for future breeding. This loss of aquatic habitat could be offset by creating aquatic breeding sites within the Gabilan and Natividad Creek corridors, both of which provide a direct linkage to the aestivation areas in the foothills north of Old Stage Road. It is anticipated that the restoration and creation of habitat along these creek corridors would serve as on-site compensatory mitigation for CTS habitat loss.

The final determination of compensatory mitigation, including the appropriate ratio, is determined through the regulatory permit process in consultation with the USFWS and CDFW. With implementation of the following measures, the CASP itself, and therefore the proposed tentative map, would avoid, minimize, and mitigation the impact on CTS to the extent feasible. However, the proposed map could result in a direct impact through incidental take of an individual. The proposed map will also indirectly affect this species through habitat modifications or reductions, which will eliminate a breeding site which may reduce the number of, or restrict the range this special status species. Regardless of the avoidance, minimization, and mitigation provided in the following mitigation measures, this impact will remain ***significant and unavoidable*** **(see Mitigation Measures 3.2-1, 3.2-2, 3.2-3, 3.2-4, and 3.2-5 below).**

There are numerous special-status birds that are documented within the region. The Specific Plan Area was assessed for habitat to support special-status birds. Field surveys revealed the presence of two special-status birds: yellow warbler (*Setophaga petechial*), and California horned lark (*Eremophila alpestris actia*). While other special-status birds were not observed on-site during field surveys, it is highly likely that they could regularly use or pass through the Specific Plan Area given their high mobility.

Per the Final EIR, there are very few trees suitable for nesting within the Specific Plan Area. The majority of potential nesting trees are associated with the farm residence complexes located between Natividad Road and Gabilan Creek, or within Gabilan Creek corridor. There was no evidence of nesting in the on-site trees during any of the past field surveys. There are also powerlines located along Natividad Road, Old Stage Road, and a transmission line that bisects through the center of the Specific Plan Area in the farmland. There were no nests observed in the powerlines/poles. Construction activities in the Specific Plan Area would create temporary sources of noise and light that could affect nesting songbirds if they are located adjacent to the Specific Plan Area in the future. The ongoing activities associated with the operational phase (i.e., human and/or domesticated animal presence, light, noise, etc.) could disrupt nesting birds if they are located adjacent to the Specific Plan Area in the future. The following mitigation is intended to avoid and minimize impacts to special-status birds to the extent feasible. The measure requires a preconstruction survey of the Specific Plan Area and immediate vicinity for all special-status birds protected by the federal and state ESA, MBTA and CFGC prior to construction. Such a survey would ensure that appropriate avoidance and minimization measures could be applied during the construction process to ensure that nesting birds were not adversely affected if determined to be present at that time. If nesting birds are found during the survey, a 300-foot buffer would be developed around active nests to ensure that the nesting birds are not disrupted during the breeding (February 1 – September 15). If construction stops for a period of 15 days or more during the avian breeding season than an additional bird survey shall be conducted.

Construction activity shall be prohibited within the buffer zones until the young have fledged. Nests shall be monitored at least twice per week during the nesting season and a report submitted to the City and CDFW monthly. With implementation of the following measures, the CASP itself, and therefore the proposed tentative map would not, directly or indirectly, have a substantial adverse effect on bird species through habitat modifications or reductions, cause populations to drop below self-sustaining levels, substantially eliminate a community, or substantially reduce the number of, or restrict the range of, an endangered, rare or threatened species, including those considered candidate, sensitive, or special status in local or regional plans, policies, regulations, or by the CDFW or USFWS. Implementation of the proposed project, with the following mitigation measure, would ensure that potential impacts to special status nesting birds are reduced to a ***less than significant*** level **(see Mitigation Measure 3.2-6 below)**.

Per the Final EIR, there are no documented special status fish species within the Specific Plan Area or vicinity; however, it is noted that the headwaters of Gabilan Creek hold trout. Trout, absent migration impediments, are anadromous fish species that are born in freshwater rivers and streams, and then some trout species, such as steelhead trout, migrate to the Pacific Ocean to grow and mature before returning to their place of origin to spawn. Trout that make the freshwater to saltwater migration are called Steelhead trout, which are present in the Salinas River and its tributaries. Anadromous fish resources once flourished naturally in the Salinas River system, but have significantly declined as a result of habitat destruction from agricultural practices, water diversion, flood control, mining, sedimentation, and bank degradation. Riparian vegetation is critical for the maintenance of high quality fish habitat. It provides cover, controls temperature, stabilizes stream banks, provides food, and buffers streams from erosion and impacts of adjacent land uses. Riparian vegetation also affects stream depth, current velocity, and substrate composition. The decline of riparian communities in California is a factor contributing to the loss of high-quality fish habitat.

Past steelhead studies along the Gabilan Creek suggests that the section through the Specific Plan Area is not currently conducive for anadromous fish spawning due to the sandy bed, lack of perennial water flows, and high suspended sediment during water flows. Additionally, due to the lack of flows and high-water temperatures, the section of Gabilan Creek through the Specific Plan Area is likely an obstruction to trout upstream that may otherwise use the corridor to migrate.

Ideal creek habitat in Gabilan Creek would include a dense riparian canopy, cobble bed, and continuous water flow. Restoration of a creek for anadromous fish is possible and one example in the region is the Marsh Creek located in Contra Costa County. This creek was a historical fishery for anadromous fish through the 1950s, but ceased to hold anadromous fish for over a half a century following water diversion, damming, and habitat degradation. A restoration effort in the early 2000s facilitated habitat enhancements that ultimately led to Chinook salmon and steelhead utilizing the Marsh Creek and its tributaries. The restoration of Gabilan Creek through the Specific Plan Area would be one step closer to restoring the Gabilan Creek as a Steelhead fishery.

While the proposed tentative subdivision map is not anticipated to have any adverse impacts on Steelhead given that they are not anticipated to be present within the Specific Plan Area, the restoration and habitat creation efforts on Gabilan and Natividad Creeks is anticipated to provide beneficial impacts for these creek corridors as fisheries. It is important that the restoration design consider the habitat elements that are critical to fisheries, including that of the Steelhead. Such improvements include dense riparian canopy, cobble bed, pools and rifles, anchored logs in pools for cover/shade, and continuous water flow.

Based on field surveys, habitat conditions, and records searches, there are no special status fish species that have the potential to be present within the Specific Plan Area. The CASP itself, and therefore the proposed tentative map, would not, directly or indirectly, have a substantial adverse effect on fish species through habitat modifications or reductions, cause populations to drop below self-sustaining levels, substantially eliminate a community, or substantially reduce the number of, or restrict the range of, an endangered, rare or threatened species, including those considered candidate, sensitive, or special status in local or regional plans, policies, regulations, or by the CDFW or USFWS. The restoration and habitat creation of the creek corridors, however, would provide ***beneficial impacts*** on special-status fish species.

There are numerous special-status mammals that are documented within the region. None are documented in the Specific Plan Area or the general vicinity. The Specific Plan Area was assessed for habitat to support special-status mammals and based on field surveys and records searches, two warranted a more detailed evaluation within the CASP EIR due to the habitat conditions including Monterey dusky-footed woodrat (*Neotoma fuscipes Luciana*), and protected bats.

Monterey Dusky-Footed Woodrat (*Neotoma fuscipes luciana*). The Monterey dusky-footed woodrat is a California Species of Special Concern that occurs in a variety of woodland and scrub habitats in Monterey County. Dusky-footed woodrats are found in riparian and oak woodland forests or thick chaparral habitat. Dusky-footed woodrats build large, complex nests of sticks and other woody debris. Nests are typically located near the bases of trees or shrubs, under snags, under dense brush, in the lowest branches of trees, and are often found within riparian areas. Dusky-footed woodrats favor dense canopy cover and areas with poison oak. The breeding season generally begins in February and continues through September, and females have a single brood per year. This species may occur at times within riparian vegetation found in the region, most notably along Gabilian Creek; however, appropriate habitat is not present within Natividad Creek or the balance of the Specific Plan Area.

Gabilan Creek traverses the Specific Plan Area from the north to south and exhibits about 30 feet of elevational drop from the upstream, north edge of the Specific Plan Area to the downstream, south edge at Boronda Road. The width of the Gabilan Creek corridor ranges approximately 30 feet wide in its most disturbed areas, to 180 feet wide

in its most undisturbed natural areas. Gabilan Creek has been degraded over time as a result of agricultural practices, but still has some intact riparian habitat. The Specific Plan will use year-round runoff, vegetation and detention areas to create a riparian corridor for Gabilan Creeks. The total riparian area created will be approximately 30 acres for Gabilan Creek. It is anticipated that the restoration and alteration of these creek corridors will require some temporary impact that which would require regulatory approval. It is also anticipated that the restoration and alteration of these creek corridors will ultimately result in improved habitat quality of these creek corridors, which will include habitat opportunities for the Monterey dusky-footed woodrat.

It is anticipated that there will be two crossings/bridges over Gabilan Creek. This includes the crossings/bridges associated with the Russell Road extension, as well as an internal roadway. The two crossings over Gabilan Creek are anticipated to impact no more than 0.5 acres combined. This calculation accounts for Gabilan Creek being approximately 100' and 130' wide in the area of the crossings and the roadway section being no wider than 100'. The permanent impact of 0.5 acres for the roadway crossings over Gabilan Creek are anticipated to be fully mitigated through on-site compensatory mitigation through the restoration and habitat creation efforts that will amount to 30 acres. While the Monterey dusky-footed woodrat has not been observed within the Gabilan Creek, or anywhere within the Specific Plan Area, these restoration efforts will create enhanced habitat opportunities for this species to occupy the area in the future. The following mitigation measure is presented to ensure appropriate measures are taken to avoid and minimize impacts to this species to the extent feasible.

Per the Final EIR, the Specific Plan Area provides potential habitat for several special-status bats, including: Mexican free-tailed bat (*Tadarida brasiliensis),* California mastiff bat (*Eumops perotis californicus*), big brown bat (*Eptesicus fuscus),* Hoary bat (*Lasiurus cinereus),* spotted bat (*Euderma maculatum),* Townsend's big-eared bat (*Corynorhinus townsendii),* pallid bat (*Antrozous pallidus*), western pipistrelle (*Pipistrellus Hesperus),* small-footed myotis/bat (*Myotis ciliolabrum*), long-eared myotis/bat (*Myotis evotis*), California myotis (*Myotis californicus),* long-legged myotis/bat (*Myotis volans*), Yuma myotis/bat (*Myotis yumanensis*), and little brown bat *(Myotis lucifugus).* These species are not federal or State listed; however, most of them are considered California Species of Special Concern and/or are tracked by the CNDDB. Bats are found in a variety of habitats in the region, including buildings, bridges, mines, caves, tree cavities, under bark or rocks, etc. There is the potential for bats to roost in the three farm residences complexes located between Natividad Road and Gabilan Creek, as well as among the numerous outbuildings scattered throughout the Specific Plan Area. In addition, the Gabilan Creek provides habitat for a variety of bat species for both roosting and foraging. There is no evidence that there are bat roosts present in these locations at this time; however, they can become occupied at some future date. Mitigation Measure 3.2-7 is presented to ensure appropriate measures are taken to avoid and minimize impacts to bats to the extent feasible.

Per the Final EIR, with implementation of the following measures, the CAST itself, and thus the proposed tentative subdivision map, would not, directly or indirectly, have a substantial adverse effect on mammal species through habitat modifications or reductions, cause populations to drop below self-sustaining levels, substantially eliminate a community, or substantially reduce the number of, or restrict the range of, an endangered, rare or threatened species, including those considered candidate, sensitive, or special status in local or regional plans, policies, regulations, or by the CDFW or USFWS. With implementation of the following measure, this potential impact is reduced to a ***less than significant*** level **(see Mitigation Measure 3.2-7 below)**

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The records search identified numerous special-status plants located within the region. Field surveys and habitat evaluations were performed in 2004 by Biotic Resources Group: March (26th and 31st), April (14th and 30th), May (17th), June (17th), July (26th). Additional field surveys were performed by De Novo Planning Group in 2015 September (11th) and in 2016 (April 18th). The collection of field surveys included surveys that coincided with the blooming period for special many status plants known to occur within the region. The conditions of the Specific Plan Area are highly disturbed due to the active agricultural operations. No special-status plants were observed within the Specific Plan Area during field surveys. The proposed project would not, directly or indirectly, have a substantial adverse effect on plant species through habitat modifications or reductions, cause populations to drop below self-sustaining levels, substantially eliminate a community, or substantially reduce the number of, or restrict the range of, an endangered, rare or threatened species, including those considered candidate, sensitive, or special status in local or regional plans, policies, regulations, or by the CDFW or USFWS. Implementation of the proposed project will have a ***less than significant*** impact on candidate, sensitive, or special-status plants.

The Specific Plan Area contain several hydrologic features, including natural (creeks) and man-made (irrigation ditches). The most notable hydrologic features include Gabilan and Natividad Creeks.

Gabilan Creek traverses the Specific Plan Area from the north to south and exhibits about 30 feet of elevational drop from the upstream, north edge of the Specific Plan Area to the downstream, south edge at Boronda Road. The width of the Gabilan Creek corridor ranges approximately 30 feet wide in its most disturbed areas, to 180 feet wide in its most undisturbed natural areas.

Natividad Creek has three tributaries within the Specific Plan Area and exhibits a higher degree of elevational variation, with about 75 feet of differentiation from the hillslope between the two tributary channels entering from the north (crossing the future extension of Russell Road) and northeast (crossing Old Stage Road) to Boronda Road. Hillslopes on both sides of the creek range up to 30 to 40 feet higher in elevation than the channel bed, especially along the future extension of Constitution Boulevard, and near the downstream edge of the Specific Plan Area at Boronda Road. The width of the

Natividad Creek corridor ranges approximately 20 feet wide in its most disturbed areas, to 120 feet wide in its most undisturbed areas.

Gabilan Creek has been degraded over time as a result of agricultural practices, but still has some intact riparian habitat. Natividad Creek has been largely converted from its natural state to an agricultural drainage ditch void of any vegetation. The Specific Plan proposes to use year-round runoff, vegetation and detention areas to create a riparian corridor for both Gabilan and Natividad Creeks. The total riparian area created within the Specific Plan Area will be approximately 30 acres for Gabilan Creek and 74 acres for Natividad Creek. It is anticipated that the restoration and alteration of these creek corridors will require some fill activity which would require regulatory approval. It is also anticipated that the restoration and alteration of these creek corridors will ultimately result in improved habitat quality of these creek corridors.

The Specific Plan Area contains an internal network of agricultural ditches along the margins of the farm fields. These areas were mostly void of vegetation during the field surveys of September 2015 and April 2016. Farmworkers indicated that the ditches are regularly maintained to control/collect irrigation runoff from the fields. These features are manmade and are fed only by local irrigation water during the irrigation season or rainfall during the winter/spring season.

The USACE has regulatory responsibility for navigable waters as well as "all other waters such as...streams ...wetlands...and natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce" (33 CFR 323.2) under Section 404 of the CWA. A formal jurisdictional determination must be made by the USACE relative to the protected wetlands and jurisdictional waters within the Specific Plan Area. The agricultural irrigation ditches are manmade and believed to solely function to drain upland agricultural runoff. As such, they are expected to be exempted from the USACE jurisdiction under the Irrigation Ditch Exemption pursuant to Federal Regulations (33 CFR 323.4(a)(3)). However, a final determination must be made by the USACE prior to any filling of these ditches for urban use. The agricultural irrigation ditches would not be subject to state jurisdiction either under the Procedures for the Discharge of Dredged or Fill Material to Waters of the State.

It is anticipated that the four crossings/bridges over Natividad Creek and two over Gabilan Creek, would warrant regulatory approval by the USACE and RWQCB (Porter-Cologne Water Quality Control Act and Water Quality Certification pursuant to Section 401 of the Clean Water Act). This includes the crossings/bridges associated with the Russell Road extension, which crosses both creeks. These may qualify for a Nationwide Permit 14 (Linear Transportation projects); however, any permit authorizing a crossing will likely be combined with the permit authorizing restoration of the creek corridors. The exact design of the crossings is not yet developed, but the estimated impact area has been calculated for this analysis.

The four crossings over Natividad Creek are anticipated to impact no more than 0.05 acres each. This calculation accounts for Natividad Creek being approximately 20' wide in the area of the crossings and the roadway section being no wider than 100'. The total fill associated with the crossings/bridges over Natividad Creek is estimated to be 0.2 acres for the four crossings combined. The two crossings over Gabilan Creek are anticipated to impact no more than 0.5 acres combined. This calculation accounts for Gabilan Creek being approximately 100' and 130' wide in the area of the crossings and the roadway section being no wider than 100'.

The permanent impact of 0.7 acres for the roadway crossings are anticipated to be fully mitigated through on-site compensatory mitigation through the restoration and habitat creation efforts along these creek corridors. The on-site mitigation is anticipated to amount to 30 acres for Gabilan Creek and 74 acres for Natividad Creek. The final design of the creek corridor is not complete and will require a full restoration plan, including maintenance plan, in order for it to be accepted by the regulatory agencies as on-site mitigation. These plans would be prepared upon approval of the Specific Plan, and prior to any disturbance to the creek corridors.

Per the Final EIR, the CASP had the potential to have a substantial adverse effect on federal or state protected wetlands through direct removal, filling, hydrological interruption, or other means. Implementation of the following mitigation measure, however, will ensure that there is no fill, or hydrologic interruption, to a jurisdictional facility, without an appropriate authorization from the regulatory agencies (USACE, RWQCB, and CDFW). Additionally, the following mitigation measure would require a "no net loss" of wetland, which would require a 1:1 replacement of acreage and function of all wetlands and other waters that would be removed, lost, or degraded as a result of project implementation or operations. With implementation of the Mitigation Measure 3.2-8, the impact of the CASP, and thus of the proposed tentative subdivision map would be ***less than significant*** **(see Mitigation Measure 3.2-8 below)**

The Specific Plan Area is currently being farmed and contains limited development. Most agricultural activity on-site and in the immediate vicinity has consisted of cultivation of various types of row crops. The site has been heavily disturbed for years from agricultural practices. Two creeks cross through the Specific Plan Area: Gabilan Creek in the west and Natividad Creek in the east.

Gabilan Creek has been degraded over time as a result of agricultural practices, but still has some intact riparian habitat. Natividad Creek has been largely converted from its natural state to an agricultural drainage ditch void of any vegetation. As such, the existing habitat value of the creek corridors is limited. The Specific Plan proposes to use year-round runoff, vegetation and detention areas to create a riparian corridor for both Gabilan and Natividad Creeks. The total riparian area created within the Specific Plan Area will be approximately 30 acres for Gabilan Creek and 74 acres for Natividad Creek. It is also anticipated that the restoration and alteration of these creek corridors will ultimately result in improved habitat quality of these creek corridors. The

improvements to the habitat quality will create more likelihood that the corridor would be occupied by a variety of flora and fauna that is not currently present.

As noted previously, the restoration and habitat creation efforts on Gabilan and Natividad Creeks are anticipated to provide beneficial impacts for these creek corridors as fisheries. The restoration and habitat creation efforts will include improvements such as dense riparian canopy, cobble bed, pools and rifles, anchored logs in pools for cover/shade, and continuous water flow. Although the restoration area will be located adjacent to existing and future urban development, these biological improvements will further encourage a variety of flora and fauna that is not currently present, which could attract animal species and maximize the biological benefits of the creek corridors compared to the existing condition.

The CASP will cause a permanent impact to 0.7 acres of the existing creek corridor for roadway crossings/bridges; however, this permanent impact is anticipated to be fully mitigated through on-site compensatory mitigation through the restoration and habitat creation efforts along these creek corridors. The on-site mitigation is over the two creeks is anticipated to total 104 acres. The final design of the creek corridor is not complete and will require a full restoration plan, including maintenance plan, in order for it to be accepted by the regulatory agencies as on-site mitigation. These plans would be prepared upon approval of the Specific Plan, and prior to any disturbance to the creek corridors. With the restoration/creation of the 104 acres of creek corridor along Gabilan and Natividad Creeks, and the implementation of Mitigation Measure 3.2-7, the CASP itself, and thus the proposed tentative subdivision map, would have a ***less than significant*** impact on riparian habitat or sensitive natural communities.

Concerning wildlife movement and migration, per the Final EIR, the Specific Plan Area is used predominantly for active agricultural production, which generally prohibits most overland wildlife movement due to the lack of suitable vegetative cover. The exception is the creek corridors and irrigation ditches. This network of irrigation ditches throughout the Specific Plan Area provides some aquatic linkage and potential movement corridors for special status species documented in the vicinity, including CTS, CRLF, WPT, and possibly Steelhead. The margins of the ditches provide some opportunities for refugia given that they are not disced/disturbed as frequently as the cultivated areas. There is potential refugia habitat in crevices, and/or debris.

While the restoration and habitat creation areas along two creek corridors would result in improved movement, aquatic, and refugia habitat compared to what exists presently, the balance of the Specific Plan Area will no longer serve as movement habitat with the construction of facilities and structures (i.e., residential subdivisions, roadways, etc.) which would impede movement of wildlife throughout the Specific Plan Area. After construction, all movement would be pinched off everywhere except at Gabilan and Natividad, where it would be significantly improved. For example, during the migration period, CTS is believed to move from the foothills located to the north and east of the Specific Plan Areas down through the agricultural areas and ultimately breed in the

0.25-acre agricultural basin/pond located on the east side of Natividad Road, approximately 0.4 miles north of East Boronda Road. CTS breeding is documented in this basin/pond. Once the Specific Plan Area is developed, this basin/pond will be cut off from the surrounding foothill areas, meaning it will not be possible for CTS individuals that are estivating in the foothills to migrate to this breeding basin/pond during the breeding season. It is noted that upon development of the Specific Plan Area, there will be points of entry that CTS can use to reach the on-site creek corridors, and within those corridors there are mitigation specifications that require the creation of aquatic breeding sites at least equivalent in size to the breeding site that is lost.

Per the Final EIR, the CASP has the potential to interfere substantially with the movement of native fish or wildlife species or with established wildlife corridors, or impede the use of native wildlife nursery sites. Development of the CASP would eliminate any movement habitat through the Specific Plan Area that is currently used for farmland, along with any upland habitat adjacent to the movement corridors. This is a potentially significant impact. There are no mitigation measures that can fully mitigate this impact and, given the fact that once the land is converted, it will no longer be a viable migration corridor for any species.

As noted previously, the restoration and habitat creation efforts on Gabilan and Natividad Creeks is anticipated to provide beneficial impacts for these creek corridors as fisheries. The restoration and habitat creation efforts would include improvements such as dense riparian canopy, cobble bed, pools and rifles, anchored logs in pools for cover/shade, and continuous water flow. Although the restoration area would be located adjacent to existing and future urban development, these biological improvements would further encourage a variety of flora and fauna that is not currently present, which could attract animal species and maximize the biological benefits of the creek corridors compared to the existing condition.

In an attempt to offset the impact to the extent feasible, the Specific Plan includes two significant restoration and habitat creation areas totaling 104 acres along two creek corridors. Functionally, these areas will provide quality habitat for CRLF, CTS, WPT, as well as Steelhead. Nevertheless, although Natividad and Gabilan Creeks will be restored and habitat will be created along these creek corridors, the balance of the Specific Plan Area will be permanently removed from movement habitat. Implementation of the proposed project would have a ***significant and unavoidable*** impact relative to the loss of movement habitat through the Specific Plan Area, combined with the loss of upland habitat.

The Specific Plan area is not subject to a Habitat Conservation Plan or Natural Community Conservation Plan. Therefore, neither the CASP nor the proposed tentative subdivision map would conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan. The proposed project would have a ***less than significant*** impact relative to this topic.

State law requires any decision by a city affecting land use and development to be consistent with its General Plan. This determination is ultimately made by the City Council. If an action, program or project is inconsistent with the General Plan, State law requires it be reconciled. This may involve modification to the action, program, or project, or amendment of the General Plan. Alternatively, a proposed project can be denied due to General Plan inconsistency. Therefore, this impact discussion will evaluate the proposed project's consistency with the Salinas General Plan as it related to biological resources. The evaluation will consider the proposed project's consistency with the adopted General Plan policies included within the Conservation/Open Space Element of the Salinas General Plan. This impact discussion also includes an evaluation of the project's consistency with the City of Salinas Municipal Code.

City of Salinas General Plan: The following discussion analyzes the project's consistency with the relevant goal and policies of the City's General Plan.

Policy COS-2.1: Participate in and implement local and regional programs that promote water conservation.

> Impacts associated with water supply are analyzed in Section 3.11, Utilities, of the CASP EIR. As noted in Draft EIR Section 3.11, all new buildings and irrigated area systems in the Central Area Specific Plan are to comply with current City of Salinas Codes (including the City's Water Efficient Landscape ordinance), the City's General Plan EIR Mitigation Monitoring and Reporting Program, and the California Plumbing and California Green Building Codes, which mandate installation of water conservation plumbing fixtures and fittings.
>
> The proposed project is consistent with Policy COS-2.1.

Policy COS-1.6: Enforce national (NPDES) requirements and participate in regional efforts to protect and enhance water quality.

> Impacts associated with hydrology and water quality are analyzed in Section 3.6, Hydrology and Water Quality, of the CASP EIR. As noted in Impact 3.6-1, in accordance with the National Pollutant Discharge Elimination System (NPDES) Stormwater Program, Mitigation Measure 3.6-1 ensures compliance with existing regulatory requirements to prepare a Stormwater Pollution Prevention Plan (SWPPP) designed to control erosion and the loss of topsoil to the extent practicable using best management practices (BMPs) that the RWQCB has deemed effective in controlling erosion, sedimentation, runoff during construction activities. Additionally, Mitigation Measure 3.6-2 requires the project applicant to submit detailed plans and calculations for water quality BMPs and water quality detention/retention basins design, consistent with the City's NPDES permit requirements. These are regulatory requirements that have been incorporated into the EIR as mitigation to ensure water quality is maintained.

The proposed project is consistent with Policy COS-1.6.

Policy COS-5.1: Protect and enhance creek corridors, river corridors, the reclamation ditch, sloughs, wetlands, hillsides and other potentially significant biological resources for their value in providing visual amenity, flood protection, habitat for wildlife and recreational opportunities.

The Specific Plan Area contain two creek corridors: Gabilan and Natividad Creeks. Both Creeks have been degraded over time as a result of agricultural practices. The Specific Plan requires the use of year-round runoff, vegetation and detention areas to create a riparian corridor for both Gabilan and Natividad Creeks. The total riparian area created within the Specific Plan Area will be approximately 30 acres for Gabilan Creek and 74 acres for Natividad Creek. It is also anticipated that the restoration and alteration of these creek corridors will ultimately result in improved habitat quality of these creek corridors. The improvements to the habitat quality will create more likelihood that the corridor would be occupied by a variety of flora and fauna that is not currently present. Additionally, the creek corridors will provide a unique visual amenity, recreational opportunities, and flood protection.

The Specific Plan Area contains an internal network of agricultural ditches along the margins of the farm fields. These areas were mostly void of vegetation during the field surveys of September 2015 and April 2016. Farmworkers indicated that the ditches are regularly maintained to control/collect irrigation runoff from the fields. These features are manmade and are fed only by local irrigation water during the irrigation season or rainfall during the winter/spring season.

A mitigation measure has been incorporated into this project to ensure that no fill activities of any ditches occur without consultation and/or permitting from the USACE and RWQCB.

The proposed project is consistent with Policy COS-5.1.

Policy COS-5.2: Explore with Monterey County the potential for creation of a Gabilan Creek Regional Park extending along the creek from the urban edge to the headwaters in the Gabilan Mountains.

The proposed project includes the restoration of Gabilan Creek, including the creation of an expanded corridor for habitat, flood protection, passive recreation, and visual enhancement. The total acres of this corridor are anticipated to be 30 acres. As discussed below, the Gabilan Creek corridor would allow for picnicking, sitting, exercising or other activities along the banks of the creek. Gabilan Mountains are located further east of the Creek and is not directly affected by the proposed project.

The proposed project is consistent with Policy COS-5.2.

Policy COS-7.2: Maximize the use of built and natural features to develop a citywide network of parks and open spaces with Carr Lake, Gabilan Creek and the Sherwood Park/Rodeo Grounds complex as essential elements of the open space network.

Carr Lake, and the Sherwood Park/Rodeo Grounds complex are not located on the Specific Plan Area. Gabilan Creek traverses through the Specific Plan Area from north to south. The proposed project includes the restoration of Gabilan Creek, including the creation of an expanded corridor for habitat, flood protection, passive recreation, and visual enhancement. The total acres of this corridor are anticipated to be 30 acres and will specifically include recreational elements (i.e. trail network). In addition, Natividad Creek will have a similar restoration effort that will results in an expanded open space network throughout the Specific Plan Area. In addition to these natural features, the proposed project includes ample park and open space uses such that all residents will be within an approximately five-minute walking time of a park.

According to the Specific Plan, the natural drainage tributaries of Natividad Creek and Gabilan Creek would be preserved and enhanced as natural ecological and recreational elements in the project's diverse open space system. A walking/biking trail system with activity "nodes" for picnicking, sitting, exercising or other activities would traverse the banks of the creek corridors. As these areas are planned, consultation with qualified biotic and ecological experts would be necessary to ensure the proper balance between habitat creation/protection and recreation design.

The proposed project is consistent with Policy COS-7.2.

Policy COS-7.11: Develop and maintain an integrated system of open-space corridors and trails along utility easements, power-transmission-line rights-of-way, the reclamation ditch, stream banks, drainageways, slopes, and other natural features.

The proposed project includes development of an integrated system of open-space corridors and trails. The most notable is associated with two creek corridors: Gabilan and Natividad Creeks. The Specific Plan proposes to use year-round runoff, vegetation and detention areas to create a riparian corridor for both Gabilan and Natividad Creeks. The total riparian area created within the Specific Plan Area will be approximately 30 acres for Gabilan Creek and 74 acres for Natividad Creek. The creek corridors will provide a unique visual amenity, recreational opportunities, as well as flood protection and habitat enhancement.

The proposed project is consistent with Policy COS-7.11.

Policy COS-7.12: Link activity centers, recreational opportunities, transit nodes and other services to the integrated trails network.

Monterey-Salinas Transit (MST) currently provides transit access to the Specific Plan Area from existing bus stops located along Boronda Road. One of the primary project objectives is to create a community with a compact form that promotes sustainable neighborhood design and is pedestrian, bicycle, and transit friendly. The proposed project includes development of an integrated system of open-space corridors and paths in an area of the City which is currently served by MST. Additionally, as shown in Figure 2-6 in Chapter 2.0, Project Description, various recreational opportunities would be provided by the onsite parks, which would also be linked by the proposed open space corridors along Gabilan and Natividad Creeks.

The proposed project is consistent with Policy COS-7.12.

Policy COS-21: Protection and Enhancement of Special Status Species. Require project developers to protect and enhance special status species habitat through setbacks and open space easements within new development and/or redevelopment areas. Protection and enhancement of special status species habitat shall require management of the habitat to ensure persistence of the species within the setback areas.

Surveys shall be conducted at the appropriate season to ascertain whether the habitats within the proposed project area support special status species. If special status species are observed, avoidance measures shall be implemented.

A qualified biologist shall conduct a biological assessment of all habitat areas to assess the potential for the following special status species: Congdon's tarplant, Contra Costa goldfields, Pinnacles buckwheat, Alkali milk-vetch, Santa Cruz clover, Hutchinson's larkspur, Kellogg's horkelia, Burrowing owl, and /or California tiger salamander. If suitable habitat for any of these species is observed, then focused surveys during the appropriate season should be conducted. Such surveys would include winter and spring surveys for tiger salamander, protocol presence/absence surveys for burrowing owl, and spring/summer surveys for special status plant species. The California Department of Fish and Wildlife shall be consulted regarding the appropriate level of effort and protocol prior to conducting focused wildlife species surveys. If any of these species are found to inhabit the survey area, the City may require the preparation and implementation of a Habitat Management Plan to provide protection for the habitat. If impacts to occurrences are deemed unavoidable, the plan shall identify mitigation measures to compensate for impacts to the species. As part of the Habitat Management Plan, a 100-foot buffer shall be established around rare plant occurrences. The plan shall include measures to manage the rare plant occurrences for their protection and persistence at the site. The Habitat Management Plan shall be reviewed and approved

by the California Department of Fish and Wildlife and/or USFWS prior to issuance of any permits by the City.

Prior to any proposed development within 150 feet of the stream corridors, protocol presence/absence surveys for California red-legged frog, southwestern pond turtle, and nesting birds should be conducted.

If these species are observed, the CDFG and the USFWS should be consulted regarding appropriate measures to avoid and mitigate potential impacts of the project on these species. The City shall not issue any permits prior to obtaining written approval from the CDFG and/or USFWS that the proposed mitigation plan has been approved.

Prior to any proposed development within or adjacent to oak woodland, a qualified biologist should conduct surveys to determine if protected wildlife species are nesting in the oak woodland, e.g., nesting raptors. If trees are to be removed, a qualified bat biologist should evaluate the trees as potential bat roost sites prior to removal, and recommend measures to avoid impacts to bats, such as exclusionary devices.

As noted above, various field surveys of the Specific Plan Area have been conducted, including March (26th and 31st) 2004, April (14th and 30th) 2004, May (17th) 2004, June (17th) 2004, July (26th) 2004, September (11th) 2015, and (April 18th) 2016. These surveys were conducted during the appropriate season to ascertain whether the habitats within the Specific Plan Area support special status species. Additional surveys of the Specific Plan Area would be conducted prior to any proposed construction activities, as required by Mitigation Measures 3.2-6 (nesting birds) and 3.2-7 (roosting special-status bats). A qualified biologist conducted a biological assessment of all habitat areas to assess the potential for the following special status species (among other species): Congdon's tarplant, Contra Costa goldfields, Pinnacles buckwheat, Alkali milk-vetch, Santa Cruz clover, Hutchinson's larkspur, Kellogg's horkelia, Burrowing owl, and /or California tiger salamander. See Tables 3.2-2 and 3.2-3 for the potential for each of these species to occur in the Specific Plan Area.

The Specific Plan Area contains suitable habitat for several special-status species, as discussed throughout this section, including CTS, CRLF, and WPT.

CTS is documented in an agricultural basin located within the Specific Plan Area, as well as areas to the northeast and east of the Specific Plan Area. The basin within the Specific Plan Area is 0.25 acres in size located on the east side of Natividad Road. There were 30 larvae observed on September 5, 2007. Twenty-two larval tail clippings collected for genetic testing indicated that the larvae are hybrids. This documented occurrence is a metapopulation of hybrid tiger salamanders.

The entire Specific Plan Area is within the 1.3 miles migration distance for CTS. There are also small microhabitats within the Specific Plan Area, some of which can provide habitat for CTS. The microhabitats include: farmland fringe (or edge), irrigation ditches,

creek corridors, and areas farmland residence/structures. Higher quality upland habitat is found to the northeast and east in the foothill areas; however, the Specific Plan Area cannot be completely discounted as having potential refuge sites especially considering that there is a breeding site present. The paved roads, dirt roads, and tilled farmland provide limited habitat because of the frequency of disturbance in these areas.

It is noted that this population has been genetically evaluated and has been determined to be a hybrid population and is not a distinct population segment (DPS). Mitigation measures are presented that require consultation with the regulatory agencies to ensure that there is no illegal for any take, including habitat loss. The City is proposing mitigation that would require habitat restoration and/or creation along Gabilan and Natividad Creeks of ponded/basin areas that would include aquatic breeding habitat opportunities for CTS. The amount of basin/pond areas would be 0.25 acres at a minimum, which is equivalent to the size of the existing agricultural basin/pond that is a known CTS breeding site. This acreage, in the City's view, is sufficient to compensate for the loss of CTS habitat from the proposed project. Ultimately, however, the amount of compensatory mitigation will be determined by the USFWS and/or CDFW.

The final determination of compensatory mitigation, including the appropriate ratio, is determined through the regulatory permit process in consultation with the USFWS and CDFW. With implementation of the mitigation measures, the proposed project would avoid, minimize, and mitigate the impact on CTS to the extent feasible. However, the proposed project could result in a direct impact through incidental take of an individual. The proposed project will also indirectly affect this species through habitat modifications or reductions, which will eliminate a breeding site which may reduce the number of, or restrict the range this special status species.

There are also numerous documented occurrences of CRLF within the Natividad Creek corridor, which is within the Specific Plan Area. Gabilan Creek corridor provides habitat for CRLF, although none have been observed in this area. The proposed project includes a restoration and habitat creation effort that would result in a riparian corridor along both Natividad and Gabilan Creeks. Approximately 74 acres of riparian habitat would be created along Natividad Creek and 30 acres along Gabilan Creek. Given that the creation/restoration of habitat along these creek corridors is an expansion of habitat beyond what exists presently, it is anticipated that there would be a net increase in CRLF habitat. This includes breeding habitat. It is anticipated that the restoration and alteration of these creek corridors will require regulatory approval, which would involve the temporary impact to the creeks during the restoration and habitat creation process. The temporary impact to the creek corridors would have the potential to impact CRLF if present during the construction period. Additionally, CRLF could be impacted during the construction of the crossings/bridges over the creek corridor. Restoration and alteration of these creek corridors will ultimately result in improved habitat quality of these creek corridors, which would be a benefit to the CRLF population in the region.

The final determination of compensatory mitigation, including the appropriate ratio, is determined through the regulatory permit process in consultation with the USFWS and CDFW. With implementation mitigation measures, the proposed project would avoid, minimize, and mitigate the impact on CRLF. However, the proposed project could result in a direct impact through incidental take of an individual. The proposed project will also indirectly affect this species through habitat modifications or reductions, which will eliminate habitat, which may reduce the number of, or restrict the range this special status species.

The proposed project is consistent with City Council Policy COS-21.

City of Salinas Municipal Code: Chapter 35, Trees and Shrubs, of the Salinas Municipal Code protects heritage and/or landmark trees through permit requirements. Section 35-9 outlines the permit requirements for trimming, pruning, planting, removing, or otherwise interfering with any tree, shrub, or plant upon any street, parkway, or alley in the City. Section 35-18 prohibits the removal of heritage or landmark oak trees from City property except with the prior written approval by the Director.

There are trees located in the Specific Plan Area, the majority of which are located along Gabilan Creek. There are also a variety of landscaping trees associated with the three farmland residence complexes that are located between Natividad Road and the Gabilan Creek. It is anticipated that the trees associated with Gabilan Creek will be maintained, a significant planting of new trees in the corridor will occur during the restoration and habitat creation effort. Additionally, new trees will be planted in the Natividad Creek corridor associated with the restoration and habitat creation effort in that location.

It is anticipated that the trees associated with the farmland residence complexes will be removed as that area is developed. Additionally, it is anticipated that the restoration of Gabilan Creek could require the removal of dead and/or diseased trees that warrant removal. Additionally, it is anticipated that some trees will within the Gabilan Creek area will require removal associated with the two crossings/bridges. The exact number of trees to be removed cannot be calculated at this stage given that detailed designs are not yet prepared. This information will be available at the improvement plan stage of the project. It is noted that any removal of trees would be required to comply with the provisions of the Salinas Municipal Code, including Chapter 35. This is an existing standard and regulation that is enforced by the City of Salinas during the improvement/grading plan and/or building plan phase of a project.

CONCLUSION

The proposed tentative subdivision map would not conflict with local policies or ordinances protecting biological resources. The project proponent is required to comply with the provisions of the City's General Plan and Municipal Code. As demonstrated above, the proposed project is generally consistent with the above relevant open space

and conservation policies of the General Plan, as well as the City's Municipal Code. Overall, the proposed project would have a ***less than significant*** impact relative to this topic.

Impact 3.2-12: Cumulative loss of biological resources including habitats and special status species (Cumulatively Considerable and Significant and Unavoidable)

Per the Final EIR, the Specific Plan Area is located in the Central Coast Bioregion, which has a wide variety of habitats and vegetation, including coastal prairie scrub, chaparral, mixed hardwoods, oak woodlands, and redwood forests, among many other habitats. The climate in this Bioregion does not vary much with the seasons. The northern portion, and more coastal areas, experience relatively cool, often foggy summers, mild falls, and chilly, rainy winters. The southern and inland portions of this Bioregion have hot, dry summers and warm autumns that are followed by mild, wet winters. Snowfall is rare. The Central Coast Bioregion is the appropriate cumulative context because environmental impacts related to biological resources are best addressed in the context of geographic areas defined by natural features rather than by political or administrative boundaries.

The Specific Plan Area is within an area planned for growth in the City's General Plan. As discussed in Draft EIR Chapter 2.0, Project Description, the City of Salinas began the process of amending its Sphere of Influence to include the Future Growth Areas (FGAs), which are located generally to the north and east of the City. The portion of the FGA which is located generally north of Boronda Road, west of Williams Road, east of San Juan Grade Road and south of Rogge Road and the future extension of Russell Road is referred to as the North of Boronda FGA. The Monterey County Local Agency Formation Commission has annexed this FGA into the City. For planning purposes, the North of Boronda FGA was divided by the City into three separate proposed Specific Plan Areas – the West Area, the Central Area and East Area. The Central Area Specific Plan is within the City's FGA, and is located adjacent east of the existing West Area Specific Plan and adjacent west of the future East Area Specific Plan. The West Area Specific Plan was approved in December of 2019. The CASP was approved in November 2020.

CTS is documented in an agricultural basin located within the Specific Plan Area, as well as areas to the northeast and east of the Specific Plan Area. The basin within the Specific Plan Area is 0.25 acres in size located on the east side of Natividad Road. There were 30 larvae observed on September 5, 2007. Twenty-two larval tail clippings collected for genetic testing indicated that the larvae are hybrids. This documented occurrence is a metapopulation of hybrid tiger salamanders.

The entire Specific Plan Area is within the 1.3 miles migration distance for CTS. There are also small microhabitats within the Specific Plan Area, some of which can provide habitat for CTS. The microhabitats include: farmland fringe (or edge), irrigation ditches,

creek corridors, and areas farmland residence/structures. Higher quality upland habitat is found to the northeast and east in the foothill areas; however, the Specific Plan Area cannot be completely discounted as having potential refuge sites especially considering that there is a breeding site present. The paved roads, dirt roads, and tilled farmland provide limited habitat because of the frequency of disturbance in these areas.

It is noted that this population has been genetically evaluated and has been determined to be a hybrid population and is not a distinct population segment (DPS). Mitigation measures are presented that require consultation with the regulatory agencies to ensure that there is no illegal take for CTS. The regulatory agencies may also require compensatory mitigation for any take including habitat loss.

Per the Final EIR, the final determination of compensatory mitigation, including the appropriate ratio, is determined through the regulatory permit process in consultation with the USFWS and CDFW. With implementation of the mitigation measures, the proposed project would avoid, minimize, and mitigate the impact on CTS to the extent feasible. However, the proposed tentative subdivision map, like the CASP itself, could result in a direct impact through incidental take of an individual. The proposed project will also indirectly affect this species through habitat modifications or reductions, which will eliminate a breeding site which may reduce the number of, or restrict the range this special status species. Regardless of the mitigation measures, this impact was determined in the CASP EIR to be significant and unavoidable.

There are also numerous documented occurrences of CRLF within the Natividad Creek corridor, which is within the Specific Plan Area. CRLF is documented within the Natividad Creek corridor in the northern portion of the Specific Plan Area in 2004. This occurrence type was a natural/native occurrence with an occurrence rank of "fair". Gabilan Creek corridor also provides habitat for CRLF, although none have been observed in this area. The proposed project includes a restoration and habitat creation effort that would result in a riparian corridor along both Natividad and Gabilan Creeks. Approximately 74 acres of riparian habitat would be created along Natividad Creek and 30 acres along Gabilan Creek. It is anticipated that the restoration and alteration of these creek corridors will require regulatory approval, which would involve the temporary impact to the creeks during the restoration and habitat creation process. The temporary impact to the creek corridors would have the potential to impact CRLF if present during the construction period. Additionally, CRLF could be impacted during the construction of the crossings/bridges over the creek corridor. Restoration and alteration of these creek corridors will ultimately result in improved habitat quality of these creek corridors, which would be a benefit to the CRLF population in the region.

As noted previously, the restoration and habitat creation efforts on Gabilan and Natividad Creeks is anticipated to provide beneficial impacts for these creek corridors as fisheries. The restoration and habitat creation efforts would include improvements such as dense riparian canopy, cobble bed, pools and rifles, anchored logs in pools for cover/shade, and continuous water flow. Although the restoration area would be located

adjacent to existing and future urban development, these biological improvements would further encourage a variety of flora and fauna that is not currently present, which could attract animal species and maximize the biological benefits of the creek corridors compared to the existing condition. The final determination of compensatory mitigation, including the appropriate ratio, is determined through the regulatory permit process in consultation with the USFWS and CDFW. With implementation mitigation measures, the proposed project would avoid, minimize, and mitigate the impact on CRLF to the extent feasible. However, the proposed project could result in a direct impact through incidental take of an individual. The proposed project will also indirectly affect this species through habitat modifications or reductions, which will eliminate habitat, which may reduce the number of, or restrict the range this special status species. Regardless of the mitigation measures, this impact was determined in the CASP EIR to be significant and unavoidable.

Mitigation measures were developed to ensure that any fill activities are authorized by the appropriate regulatory agencies prior to disturbance, and that there be a no net loss of wetlands (1:1 minimum replacement ratio). The permit process ensures that minimization and compensation is incorporated into the activity. It was found in the Final EIR that, with the implementation of mitigation measures, the project would not have substantial adverse effects, directly or indirectly, on protected wetlands and jurisdictional waters.

The project would result in impacts to biological resources including habitats and special status species. Development of the proposed project would eliminate any movement habitat through the Specific Plan Area, along with any upland habitat adjacent to the movement corridors. This permanent loss of movement habitat was determined to be a significant and unavoidable impact. While the City has evaluated urban development in the Specific Plan Area extensively through the General Plan and North of Boronda FGA process, and subsequently determined that urban development in this location is appropriate, the physical change is not reversible and there are no mitigation measures that can fully mitigate this loss of movement/migration habitat. Given the presence of CTS and CRLF in the Specific Plan Area, the cumulative loss of movement habitat from the proposed project, when considered alongside all past, present, and probable future projects (inclusive of all communities within the Bioregion), is a ***significant and unavoidable cumulative impact***, and the Specific Plan's incremental contribution to this cumulative impact is itself ***cumulatively considerable***. The same is true for the proposed tentative subdivision map.

Applicable Mitigation from Prior EIR (if any)

The following Mitigation Measures for Biological Resources stated in the Final Mitigation Monitoring and Reporting Program from the adopted Final Environmental Impact Report for the Salinas Central Area Specific Plan dated November 2020 shall be required for any future development in the project area:

Mitigation Measure 3.2-1*:* Prior to issuance of grading and/or building permits, the project applicant, assisted by a qualified biologist, shall consult with the USFWS and CDFW to obtain the appropriate regulatory approvals and authorizations regarding CTS. It is anticipated that the applicant would need to coordinate with the USFWS and CDFW on any additional survey needs, beyond the surveys, assessments, and genetic testing that has already been performed on this site for this species, during the consultation process. The surveys, assessments, and genetic testing that has already been performed, in addition to any additional survey needs, will inform what, if any, take authorization is required from CDFW to comply with CESA. Consultation with CDFW and the USFWS shall be conducted well in advance of beginning the surveys and prior to any planned vegetation- or ground-disturbing activities.

The regulatory approvals are anticipated to include the need to submit an application for incidental take to both the USFWS (Section 7 Consultation) and CDFW (2081 incidental take permit). The project applicant's qualified biologist shall report the conclusions reached through such consultation to the City's Community Development Director. If either USFWS or CDFW determines that an incidental take permit is required, the project applicant shall obtain such a permit before engaging in any grading or other site-treatment activities in areas deemed to be viable CTS habitat.

It is anticipated that compensatory mitigation will be necessary for the loss of aquatic habitat associated with the 0.25-acre agricultural basin located on the east side of Natividad Road, approximately 0.4 miles north of East Boronda Road. At a minimum, the restoration and habitat creation of up to 30 acres along Gabilan Creek and 74 acres along Natividad Creek (net of any recreational amenities and public facilities required to facilitate the project) shall include ponded/basin areas that provide aquatic breeding habitat opportunities for CTS within the Specific Plan Area. The required amount of ponded/basin areas shall not be less than the 0.25 acres which is equivalent to the anticipated habitat loss, but the final calculation of aquatic habitat needed to compensate for that loss shall be determined by the USFWS and/or CDFW through the permit process. Additionally, the replacement aquatic habitat shall be designed with similar characteristics as the known 0.25-acre breeding pond including depths of at least five feet, and establishment of submergent and emergent vegetation around the perimeter of the pond/basin. All submergent and emergent vegetation around the pond/basin shall be from mature plantings to ensure that significant vegetation is established in the first year (i.e. no seeding or hydroseeding).

CTS migration and dispersal functions between breeding and aestivation sites shall be appropriately considered when designing and locating new aquatic breeding habitat within the creek corridors. The final restoration and habitat creation design shall be subject to the approval of the USFWS and CDFW.

Mitigation Measure 3.2-2*:* Prior to issuance of grading and/or building permits, in order to avoid and minimize impacts to California tiger salamander to the extent feasible, the proposed project activities shall be compliant with all Avoidance and Minimization

Measures imposed by the USFWS and CDFW during Construction Activities. Examples of standard avoidance and minimization measures include: 1) conducting environmental education training for all construction personnel, 2) having a biologist with an incidental take permit (ITP) for CTS to be responsible for overseeing any hand excavation of burrows using hand-trowels and spades per the regulatory agency protocols, 3) erecting drift fencing around the work areas if occurring during the migration/breeding season, 4) inspection of drift fencing by biologist with an ITP every 72 hours during the migration/breeding season 5) installation of pit traps to capture CTS migrating during the rain events with a check twice daily (morning prior to construction start and evening after construction ends), 6) relocation of any CTS found immediately to a site designated by the USFWS and CDFW per protocol; and 7) post construction report. Any disturbance/decommissioning of the basin that is a known breeding site, shall be performed under the direction of the USFWS and/or CDFW. The decommissioning of this basin shall be performed during the non-breeding season.

In addition, the project applicant shall consult with the CDFW to determine if the Project can avoid take. If take cannot be avoided, take authorization would be required prior to initiating ground-disturbing activities to comply with CESA. Take authorization would occur through issuance of an ITP by CDFW pursuant to Fish and Game Code section 2081(b). In the absence of protocol surveys, the applicant can assume presence of CTS within the Plan Area and obtain an ITP from CDFW.

California Red-legged Frog (CRLF) (*Rana draytonii*): The federally-listed Threatened and California Species of Special Concern CRLF occurs in lowlands and foothills primarily in perennial or ephemeral ponds, pools, and streams where water remains long enough (14 to 28 weeks) for breeding and metamorphosis of tadpoles. Specific breeding sites include streams, creeks, ponds, marshes, sag ponds, deep pools, backwater areas, dune ponds, lagoons, and estuaries. Habitats with the highest densities of CRLF often contain dense emergent or shoreline riparian vegetation closely associated with fairly shallow (< 0.5 meter) to deep (> 0.5 meter), still or slow-moving water (USFWS 2002). CRLF may disperse from their aquatic breeding habitats to upland habitats during the dry season. They prefer upland habitats that provide moisture to prevent desiccation and protection from predators including downed logs, woody vegetation, boulders, moist leaf litter, or other refugia during the dry season. When there is sufficient water at their breeding location, they may remain in aquatic habitats year-round instead of moving to adjacent uplands. During wet seasons, frogs can move long distances between habitats, traversing upland areas or ephemeral drainages. Dispersal distances are typically less than 0.5 km (0.3 mile), with a few individuals moving 2.0 to 3.6 kilometers (1.2 to 2.2 miles). Seeps and springs in open grasslands can function as foraging habitat or refugia for wandering frogs (Jennings and Hayes 1994).

In addition, the project applicant shall consult with the CDFW to determine if the Project can avoid take. If take cannot be avoided, take authorization would be required prior to initiating ground-disturbing activities to comply with CESA. Take authorization would

occur through issuance of an ITP by CDFW pursuant to Fish and Wildlife Code Section 2081(b). In the absence of protocol surveys, the applicant can assume presence of CTS within the Plan Area and obtain an ITP from CDFW.

This species was detected along the Natividad Creek corridor within the Specific Plan Area, as well as along Old Stage Road and the East Area Specific Plan located to the east of the Specific Plan Area. There are also numerous documented occurrences of CRLF, including breeding sites within five miles of the Specific Plan Area. CRLF may disperse through any of the drainages in the vicinity, including Gabilan and Natividad Creeks. While the Specific Plan Area does not provide high quality habitat for CRLF outside of the creek corridors, the network of irrigation ditches presents some habitat opportunities for this species.

Natividad Creek has three tributaries within the Specific Plan Area and exhibits a higher degree of elevational variation, with about 75 feet of differentiation from the hillslope between the two tributary channels entering from the north (crossing the future extension of Russell Road) and northeast (crossing Old Stage Road) to Boronda Road. Hillslopes on both sides of the creek range up to 30 to 40 feet higher in elevation than the channel bed, especially along the future extension of Constitution Boulevard, and near the downstream edge of the Specific Plan Area at Boronda Road. The width of the Natividad Creek corridor ranges approximately 20 feet wide in its most disturbed areas, to 120 feet wide in its most undisturbed areas.

There are four crossings/bridges over Natividad Creek and two over Gabilan Creek. The four crossings over Natividad Creek are anticipated to impact no more than 0.05 acres each. This calculation accounts for Natividad Creek being approximately 20' wide in the area of the crossings and the roadway section being no wider than 100'. The total fill associated with the crossings/bridges over Natividad Creek is estimated to be 0.2 acres for the four crossings combined.

Natividad Creek has been largely converted from its natural state to an agricultural drainage ditch void of any vegetation. The Specific Plan proposes to use year-round runoff, vegetation and detention areas to create a riparian corridor for Natividad Creek. Approximately 74 acres of riparian habitat would be created along Natividad Creek. It is anticipated that the restoration and alteration of these creek corridors will require regulatory approval, which would involve the temporary impact to Natividad Creek during the restoration and habitat creation process. The temporary impact to the creek corridor would have the potential to impact CRLF if present during the construction period. Additionally, CRLF could be impacted during the construction of the crossings/bridges over the creek corridor. Restoration and alteration of these creek corridors will ultimately result in improved habitat quality of these creek corridors, which would be a benefit to the CRLF population in the region.

Gabilan Creek traverses the Specific Plan Area from the north to south and exhibits about 30 feet of elevational drop from the upstream, north edge of the Specific Plan

Area to the downstream, south edge at Boronda Road. The width of the Gabilan Creek corridor ranges approximately 30 feet wide in its most disturbed areas, to 180 feet wide in its most undisturbed natural areas.

Gabilan Creek has been degraded over time as a result of agricultural practices, but still has some intact riparian habitat. Similar to the efforts along Natividad Creek, the Specific Plan proposes to use year-round runoff, vegetation and detention areas to create a riparian corridor for Gabilan Creek. Approximately 30 acres of riparian habitat would be created along Gabilan Creek. It is anticipated that the restoration and alteration of these creek corridors will require regulatory approval, which would involve the temporary impact to Gabilan Creek during the restoration and habitat creation process. The temporary impact to the creek corridor would have the potential to impact CRLF if present during the construction period. It is noted that CRLF has not been observed in Gabilan Creek; however, the habitat is conducive to this species. As such, CRLF could be impacted during the construction of the crossings/bridges over the creek corridor. Restoration and alteration of these creek corridors will ultimately result in improved habitat quality of these creek corridors, which would be a benefit to the CRLF population in the region.

CONCLUSION

The paved roads, dirt roads, tilled farmland, farmland fringe, and farmland residences provide very limited to no habitat. As previously noted, there are numerous documented occurrences of CRLF within the Natividad Creek corridor, which is within the Specific Plan Area. Gabilan Creek corridor provides habitat for CRLF, although none have been observed in this area. The proposed project includes a restoration and habitat creation effort that would result in a riparian corridor along both Natividad and Gabilan Creeks. Approximately 74 acres of riparian habitat would be created along Natividad Creek and 30 acres along Gabilan Creek. It is anticipated that the restoration and alteration of these creek corridors will require regulatory approval, which would involve the temporary impact to the creeks during the restoration and habitat creation process. The temporary impact to the creek corridors would have the potential to impact CRLF if present during the construction period. Additionally, CRLF could be impacted during the construction of the crossings/bridges over the creek corridor. Restoration and alteration of these creek corridors will ultimately result in improved habitat quality of these creek corridors, which would be a benefit to the CRLF population in the region.

The following mitigation measures are presented that require consultation with the regulatory agencies to ensure that there is no illegal take for CRLF. Additionally, the regulatory agencies have established avoidance, minimization, and mitigation measures that they impose on projects through the regulatory permitting process. These measures would require activities to avoid and minimize impacts to CRLF. Examples of standard avoidance and minimization measures include: 1) conducting environmental education training for all construction personnel, 2) having a biologist with a scientific collecting permit for CRLF to be responsible for any monitoring, 3) erecting drift fencing

around the work areas, 4) inspection of drift fencing by biologist with a scientific collecting permit every 72 hours, 5) relocation of any CRLF found immediately to a site designated by the USFWS and CDFW per protocol; and 6) post construction report. The regulatory agencies may also require compensatory mitigation for any take, including habitat loss. The determination of compensatory mitigation, including the appropriate ratio, is determined through the regulatory permit process in consultation with the USFWS and CDFW.

The final determination of compensatory mitigation, including the appropriate ratio, is determined through the regulatory permit process in consultation with the USFWS and CDFW. With implementation of the following measures, the proposed project would avoid, minimize, and mitigation the impact on CRLF to the extent feasible. However, the proposed project could result in a direct impact through incidental take of an individual. The proposed project will also indirectly affect this species through habitat modifications or reductions, which will eliminate habitat, which may reduce the number of, or restrict the range this special status species. Regardless of the avoidance, minimization, and mitigation provided in the following mitigation measures, this impact will remain ***significant and unavoidable***.

Mitigation Measure 3.2-3*:* Prior to issuance of grading and/or building permits, the project applicant, assisted by a qualified biologist, shall consult with the USFWS and CDFW to obtain the appropriate regulatory approvals and authorizations regarding CRLF. This is anticipated to include the need to submit an application for incidental take to both the USFWS (Section 7 Consultation) and CDFW (2081 incidental take permit). The project applicant's qualified biologist shall report the conclusions reached through such consultation to the City's Community Development Director. If either USFWS or CDFW determines that an incidental take permit is required, the project applicant shall obtain such a permit before engaging in any grading or other site-treatment activities in areas deemed to be viable CRLF habitat.

The Gabilan and Natividad Creek are CRLF habitat and both are anticipated to be expanded through habitat creation/restoration. The restoration and habitat creation include up to 30 acres along Gabilan Creek and 74 acres (net of any recreational amenities and public facilities required to facilitate the project) along Natividad Creek. Given that the creation/restoration is an expansion of habitat beyond what exists presently, it is anticipated that there would be a net increase in CRLF habitat. There is, however, the potential for temporary impacts to CRLF during the creation/restoration effort. The final restoration and habitat creation design shall be subject to the approval of the USFWS and CDFW.

Mitigation Measure 3.2-4*:* Prior to issuance of grading and/or building permits, in order to avoid and minimize impacts to CRLF to the extent feasible, the proposed project activities shall be compliant with all Avoidance and Minimization Measures imposed by the USFWS and CDFW during Construction Activities. Examples of standard avoidance and minimization measures include: 1) conducting environmental education training for

all construction personnel, 2) having a biologist with a scientific collecting permit for CRLF to be responsible for overseeing any hand excavation of burrows using hand-trowels and spades per the regulatory agency protocols, 3) erecting drift fencing around the work areas if occurring during the migration/breeding season, 4) inspection of drift fencing by biologist with a scientific collecting permit every 72 hours during the migration/breeding season 5) installation of pit traps to capture CRLF migrating during the rain events with a check twice daily (morning prior to construction start and evening after construction ends), 6) relocation of any CRLF found immediately to a site designated by the USFWS and CDFW per protocol; and 7) post construction report.

Mitigation Measure 3.2-5*:* Prior to issuance of grading and/or building permits, in order to avoid and minimize impacts to WPT to the extent feasible, the proposed project activities shall be compliant with the following Avoidance and Minimization Measures: 1) conduct environmental education training for all construction personnel, 2) conduct western pond turtle surveys within creek corridors, ponded/basin areas, and irrigation ditches by a qualified biologist, 3) survey upland areas within 0.5 miles of the aquatic features for evidence of nests as well as individual turtles, 4) make a reasonable effort to capture and relocate as many western pond turtles as possible to minimize take, 5) if a nest is observed, move eggs to a suitable location or facility for incubation, and release hatchlings into the creek corridor the following autumn, 6) design habitat elements within the creek corridor to benefit western pond turtle (i.e. include logs or rafts for emergent basking sites, and upland areas adjacent to ponds in a relatively open condition), and 7) post construction report. All survey and/or handling of WPT shall be performed by a qualified biologist in consultation with the CDFW.

Mitigation Measure 3.2-6: Building and grading permits and plans issued for development in the project area shall note the following: If construction activities occur during the avian breeding season (February 1 – September 15) then the project proponent shall conduct pre-construction surveys to prevent impacts to nesting birds. No more than 15 days prior to the start of construction a bird survey shall be conducted by a qualified biologist to identify any active nests within the Specific Plan Area, and shall be submitted to the City. If construction stops for a period of 15 days or more during the avian breeding season than an additional bird survey shall be conducted. The biologist will conduct a survey in the Specific Plan Area for all special-status birds protected by the federal and state ESA, MBTA and CFGC. The biologist shall map all nests that are within, and visible from, the Specific Plan Area. If nests are identified, the biologist shall map the location and establish a minimum 300-foot buffer zone around active nests. Construction activity shall be prohibited within the buffer zones until the young have fledged. Nests shall be monitored at least twice per week during the nesting season and a report submitted to the City and CDFW monthly.

Mitigation Measure 3.2-7: Grading and/or building permits and plans issued for development in the project area shall note the following:

- Monterey Dusky-Footed Woodrat: Any vegetation/ground disturbance to the Gabilan Creek associated with the crossings or restoration should be conducted when woodrats are least likely to breed in October through November. No more than 30 days prior to construction located within 50-feet of Gabilan Creek, a qualified biologist shall conduct a preconstruction survey for Monterey dusky-footed woodrat middens. At the discretion of a qualified biologist, an exclusion buffer shall be established around any woodrat middens that can be avoided, and these exclusion zones shall be fenced as Environmentally Sensitive Areas to protect the nest. If a woodrat midden cannot be avoided, potential dismantling and relocation strategies shall be developed and presented to the City of Salinas Community Development Department by a qualified biologist for review and/or approval. Potential dismantling and relocation strategies may include hiring a qualified biologist to dismantle the middens by hand for relocation within the restored/created habitat along Gabilan and Natividad Creeks, or outside of the project site as appropriate. If approved by the City, a qualified wildlife biologist may dismantle only middens within the project site that would be disturbed by construction activities. If young are encountered during dismantling of the midden, any removed material may be replaced and a 50-foot no-disturbance buffer would be established around the active midden. The buffer would remain until young are weaned and are able to disperse on their own accord (typically for a period of 14 days). All removed midden substrate would be collected and relocated to suitable woodland habitat outside of the project footprint. Appropriate personal protective equipment (e.g., respirator, gloves, and Tyvek suit) shall be used while dismantling and relocating woodrat nest material to protect against disease carried by rodents (e.g. hantavirus).

- Bats: Fifteen days prior to construction activities within 200 feet of potential bat roosting habitat, the project applicant shall retain a qualified biologist familiar with bat biology to perform a preconstruction survey for roosting special-status bats, which shall be submitted to the City. The areas with potential bat roosting habitat include: 1) the three residential complexes located between Natividad Road and Gabilan Creek, 2) the outbuildings/structures located throughout the Specific Plan Area, and 3) Gabilan Creek. The survey shall include a minimum of one daytime and one evening survey. The survey shall cover the trees, structures, and debris located within these complexes. If active roosting is observed, removal of the tree or building shall be avoided until the bats can be excluded. All active non-maternity roosting sites shall be fitted with passive exclusion devices, such as one way flaps or doors, and all bats shall be allowed to leave voluntarily. Once it is confirmed that all bats have left the roost (minimum of five days), crews shall be allowed to continue work in the area. If a maternity roosting site is discovered, a minimum 50-foot buffer shall be established around the roost. The project applicant shall consult with the qualified biologist in order to determine if a greater buffer is warranted based on the bat species, roost location, and specific construction activities to be performed in the vicinity. The buffer shall stay in effect until all young are

determined to be volant (i.e., able to fly and feed independently) by a qualified biologist. Once it is determined that all young are volant (generally by August 1st), passive exclusion devices shall be installed and all bats shall be allowed to leave voluntarily. Once it is determined by the qualified biologist that all bats have left the roost (minimum of five days), crews shall be allowed to work within the buffer zone. Project Improvement Plans will include this measure as a note in the plans.

Mitigation Measure 3.2-8*:* Prior to grading/building permit issuance in an area that would disturb the Gabilan Creek, Natividad Creek (and its tributaries), the project applicant shall obtain jurisdictional determinations from the USACE, RWQCB, and CDFW for the creeks and ditches that are proposed to be disturbed. The creeks are confirmed jurisdictional and authorization for fill from the regulatory agencies (USACE-404 permit, RWQCB-Procedures for the Discharge of Dredged or Fill Material to Waters of the State and 401 certification, CDFW-1600 Streambed Alteration Agreement) will be necessary. The irrigation ditches are anticipated to be exempt. If these regulatory agencies concur that these irrigation ditches are exempt, then no further mitigation is necessary for the irrigation ditches. If it is determined that these ditches are not exempt, authorization for fill from the regulatory agencies (USACE-404 permit, RWQCB-Procedures for the Discharge of Dredged or Fill Material to Waters of the State and 401 certification, 1600 Streambed Alteration Agreement) will be necessary. At a minimum, the project applicant shall replace on a "no net loss" basis (minimum 1:1 ratio) the acreage and function of all wetlands and other waters that would be removed, lost, or degraded as a result of project implementation or operations, although a higher mitigation measure may be required by the USACE, RWQCB, and CDFW through their permitting processes. It is anticipated that the restoration of Gabilan and Natividad Creeks will result in up to 104 acres of wetland and riparian habitat creation (net of any recreational amenities and public facilities required to facilitate the project), which will serve as onsite mitigation; however, a mitigation plan must be submitted and approved by the USACE, RWQCB, and CDFW through the permitting processes conducted pursuant to Clean Water Act Sections 401 and 404, Fish and Game Code Section 1600, and State Water Board Procedures for the Discharge of Dredged or Fill Material to Waters of the State.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
5. CULTURAL RESOURCES. *Would the project:*					
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section §15064.5	☐	☐	☐	☒	☐
(b) Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section §15064.5?	☐	☐	☐	☒	☐
(c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒	☐

Discussion

Overall conclusion: The CASP EIR provides project-level detail with respect to the proposed tentative subdivision map's effects on cultural resources, in part due to the mitigation measures required to reduce impacts to such resources. The tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the cultural resource impacts of the proposed tentative subdivision map.

Responses a.), b,), and c.) No historical resources were found during field surveys for the CASP. Additionally, there are no historical resources that have been identified in the Specific Plan Area on maps and files maintained by the Northwest Information Center

(NWIC). There have been four previous cultural resource studies that examined approximately three-quarters of the Specific Plan Area and no historical resources were documented. The Monterey County Historic Property Data File Directory and National Register of Historic Resources do not list any historical resources in the Specific Plan Area.

Most fossils within Monterey County consist of micro-organisms such as foraminifera or diatoms, or assemblages of mollusks and barnacles most commonly found in sedimentary rocks ranging from Cretaceous age (138 to 96 million years old) to Pleistocene age (1.6 million to 11 thousand years old). Fossils are found throughout the Monterey County because of the widespread distribution of marine deposits. No significant fossil records have been discovered within the Specific Plan Area. However, the City of Salinas General Plan EIR (2002) identifies that important archaeological resources have the potential to occur within the General Plan planning area, including within portions of the undeveloped North of Boronda FGA (including the present CASP area). These areas are the Carr Lake/Natividad Creek corridor and a wide band on either side of Highway 101 in the northwest portion of the General Plan planning area.

Per the CASP Final EIR, letters were sent to: the Native American Heritage Commission; Mr. Tom Little Bear Nason, Esslen Tribe of Monterey County; Tony Cerda, Chairperson, Coastanoan Rumsen Carmel Tribe; Ms. Louise Miranda-Ramirez, Chairperson, Ohlone Coastanoan-Esselen Nation; Mr. Valentine Lopez, Amah Mutsun Tribal Band; Ms. Irene Zwierlein, Chairperson, Amah Mutsun Tribal Band of Mission San Juan Bautista; and, Ms. Ann Marie Sayers, Chairperson, Indian Canyon Mutsun Band of Coastanoan. The Native American Heritage Commission responded with a letter dated April 3, 2017. Ms. Louise Miranda-Ramirez, Chairperson, Ohlone/Coastanoan-Esselen Nation responded by letter on April 22, 2017 stating that the project area is within "the indigenous homeland of our people." The letter further states that the Ohlone/Coastanoan Esselen Nation (OCEN) objects to all excavation at known cultural sites. OCEN also requests to be provided with archaeological reports and to be involved with any archaeological projects within their area, including site monitoring. OCEN specifically requests to be consulted on all projects "affecting our tribal homelands" including, but not limited to, ground disturbance. Chairperson Miranda-Ramirez concludes her April 22, 2017 letter by requesting a meeting with the City of Salinas to begin the consultation process. The tribal consultation records, along with the comment letter received, is included in **Appendix A** of the Final EIR.

It is not anticipated that ground disturbing activities would result in impacts to historical resources given that none are believed to be present. However, as with most projects in California that involve ground disturbing activities, there is the potential for discovery of a previously unknown historical resource. Project implementation may cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5. The implementation of the following mitigation measure would ensure that this potential impact is reduced to a ***less than significant*** level **(see Mitigation Measure 3.3-1 below**).

The Natividad and Gabilan Creek corridors run through portions of the Plan Area. Waterways in the region (including creeks) have historically been areas of settlement for Native Americans; therefore, there exists the potential for undiscovered archeological resources to be identified during the development of the Plan Area. However, development of the Specific Plan Area would improve and restore the Natividad and Gabilan Creek corridors. The immediate area surrounding the waterways within the Plan Area (including these creeks) would be minimally developed, with Open Space (OS) and Park (P) land uses proposed along these corridors. A carefully planned park, open space, drainage, and supplemental detention and retention system would be implemented along these corridors.

It is not anticipated that ground disturbing activities would result in impacts to archaeological resources given that none are believed to be present. However, as with most projects in California that involve ground disturbing activities, there is the potential for discovery of a previously unknown archaeological resource. Project implementation may cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5. The implementation of Mitigation Measures 3.3-1 would ensure that this potential impact is reduced to a ***less than significant*** level.

The Monterey County General Plan Draft EIR (2007) included a review of known fossil localities conducted by paleontologists in 2001. Twelve fossil sites were identified as having outstanding scientific value. For the most part, the fossils at these 12 sites reflect the type of assemblages found throughout the county (microorganisms or invertebrates); however, each has special characteristics that make it unique or rare, or in some way provide important stratigraphic or historic information. None of the 12 identified high value sites are located on or near the Specific Plan Area. Additionally, the Salinas General Plan Final EIR (2002) does not identify any high value sites in the Specific Plan Area or in the City as a whole.

However, unknown important paleontological resources have the potential to occur within the planning area including the undeveloped future growth areas, which include the Specific Plan Area. The construction of new development would involve grading and other earthwork that can disturb important fossils. Therefore, project implementation may directly or indirectly destroy a unique paleontological resource. This impact is considered potentially significant. Implementation of the following mitigation measures would reduce the impact to unknown or otherwise undiscovered paleontological resources to a ***less than significant*** level **(see Mitigation Measure 3.3-2 below).**

No human remains or known burial sites were found during field surveys for the proposed project. Additionally, there are no human remains or known burial sites that have been identified in the Specific Plan Area on maps and files maintained by the Northwest Information Center (NWIC). There have been four previous cultural resource studies that examined approximately three-quarters of the Specific Plan Area and no

human remains or known burial sites were documented. The Monterey County Historic Property Data File Directory and National Register of Historic Resources do not list any human remains or known burial sites in the Specific Plan Area.

It is not anticipated that ground disturbing activities would result in impacts to human remains or known burial sites given that none are believed to be present. However, as with most projects in California that involve ground disturbing activities, there is the potential for discovery of previously unknown human remains or known burial sites. Project implementation may disturb human remains, including those interred outside of formal cemeteries. The implementation of the following mitigation measure would ensure that this potential impact is reduced to a ***less than significant*** level **(see Mitigation Measure 3.3-3 below).**

Early consultation with the culturally and traditionally affiliated Native American Tribes was initiated in early 2017. The Ohlone/Coastanoan-Esselen Nation (a historically documented previously recognized tribe in the Plan Area) provided a comment letter on April 22, 2017, objecting to any disturbance of human remains and/or cultural items that may be discovered during the development of the Plan Area. No tribal cultural resources have been identified within or adjacent to the Specific Plan Area. Additionally, as described under Impacts 3.3-1 through 3.3-3 (above), with incorporation of Mitigation Measures 3.3-1 through 3.3-3, the proposed project would not generate a significant adverse impact to historical, archaeological, or paleontological resources, or cause a significant disturbance to any human remains. With implementation of these mitigation measures, the proposed project would not cause a substantial adverse change to the significance of a tribal cultural resource. This is a ***less than significant*** impact.

The Salinas General Plan Final Program EIR includes mitigation measures that would reduce impacts to cultural resources (Mitigation Measures CR1, CR2, and CR3). These mitigation measures were found to reduce the potentially significant impact to paleontological resources to a less than significant level in the Salinas General Plan Final Program EIR. Additionally, it was found that these mitigation measures may not reduce the potentially significant impacts to historic and archaeological resources under some circumstances where they would not apply to the approval (i.e. ministerial projects/non-discretionary). It is noted that the General Plan, as a broad citywide legislative approval, did not require a parcel-level cultural resource analysis. A detailed site-specific analysis was prepared for the CASP EIR, however; and it did not find any physical or recorded evidence that there are any cultural resources within the Specific Plan Area.

While there are extensive documented cultural resources in Salinas and unincorporated Monterey County, there are no cultural resources that were found during field surveys for the CASP EIR. Additionally, there are no cultural resources that have been identified in the Specific Plan Area on maps and files maintained by the Northwest Information Center (NWIC). There have been four previous cultural resource studies that examined approximately three-quarters of the Specific Plan Area and no cultural resources were

documented. The Monterey County Historic Property Data File Directory and National Register of Historic Resources do not list any cultural resources in the Specific Plan Area. Furthermore, mitigation measures developed in connection with the CASP EIR require the proposed project to evaluate any cultural resources discovered during construction activities. Any significant discoveries during construction would be required to be preserved in place or mitigated through relocation or documentation; and the project is not anticipated to considerably contribute to a significant reduction in cultural resources.

Absent any evidence of a cultural resource in the Specific Plan Area, the potential for an impact is considered relatively low. Mitigation measures would require practices that would alleviate any impact associated with a cultural find during construction activities that was previously unknown. It is noted that there has been no record of a cultural resource being uncovered during the regular ground disturbance associated with the agricultural activities over many decades (i.e., tilling/deep ripping). Given this fact, the probability of uncovering a cultural resource during construction is considered relatively low.

However, the cumulative setting is regional in scope and includes extensive cultural sites. Although the Specific Plan Area has been evaluated and has not been found to contain any evidence of cultural resources implementation of the proposed project, when taken together with all past, present, and probable future projects (inclusive of buildout of the various General Plans within Monterey County), has the potential to cause a significant cumulative impact. Even so, the incremental contribution of the proposed project to this larger significant cumulative impact would not be cumulatively considerable. Thus, implementation of the proposed project would have a ***less than cumulatively considerable*** incremental contribution to the significant cumulative impacts on cultural resources.

Applicable Mitigation from Prior EIR (if any)

The following Mitigation Measures for Cultural Resources included in the adopted Final Mitigation Monitoring and Reporting Program from the Final Environmental Impact Report for the Salinas Central Area Specific Plan dated November 2020 shall be required for any future development in the project area:

Mitigation Measure 3.3-1: Grading and/or building permits and plans for development in the project area shall note the following: In the event that evidence of archaeological or historical features or deposits (e.g., ceramic shard, trash scatters, lithic scatters) are uncovered (discovered) during excavation and/or grading, all work shall stop in the area of the find until an appropriate avoidance or data recovery program can be developed and implemented by a qualified archaeologist. This archaeologist shall determine whether the uncovered deposits or features qualify as either "historical resources" within the meaning of CEQA Guidelines section 15064.5, subdivision (a), "unique archaeological resources" as defined in Public Resources Code section 21083.2,

subdivision (g), or "tribal cultural resources," as defined in Public Resources Code section 21074. If historical resources, unique archaeological resources, or tribal cultural resources are present, the project proponent shall preserve any such resources in place if feasible as determined by the City Planner and/or implement any other feasible mitigation measures identified by the archaeologist and approved and imposed by the City. In assessing whether avoidance is feasible, the City Planner shall consider project design, logistics, and cost considerations. All costs associated with the City's Planner's determination of project design, logistics and cost considerations shall be borne by the developer/applicant. Avoidance is infeasible where it would preclude the construction of important structures or infrastructure or require exorbitant expenditures. Recommended mitigation measures shall be reviewed by the City Planner and shall be approved if feasible in light of project design, logistics, and cost considerations and, if approved, shall be implemented and completed prior to commencing further work for which grading or building permits were issued, unless otherwise directed by the City Planner. Data recovery, including photo documentation, excavation and recovery, laboratory analysis, etc., shall be an option if preservation in place is infeasible. Where resources have been determined to be "unique archaeological resources" but not "historical resources" or "tribal cultural resources," the project proponent's obligations shall be limited as set forth in Public Resources Code section 21083.2, subdivisions (d), (e), and (f). Grading/building permits and plans shall note this measure.

Mitigation Measure 3.3-2: Grading and/or building permits and plans for development in the project area shall note the following: If paleontological resources are discovered during the course of construction, work shall be halted immediately within 50 meters (165 feet) of the discovery, the City of Salinas shall be notified, and a qualified paleontologist shall be retained to determine the significance of the discovery. If the paleontological resource is considered significant, it should be excavated by a qualified paleontologist and given to a local agency, State University, or other applicable institution, where the resource could be curated and displayed for public education purposes.

Mitigation Measure 3.3-3*:* Grading and/or building permits and plans for development in the project area shall note the following: If human remains are found during construction within the Specific Plan Area, or at off-site infrastructure improvement locations, there shall be no further excavation or disturbance of the area of the find or any nearby area reasonably suspected to overlie adjacent human remains until a qualified archeological monitor and the coroner of Monterey County are contacted. If it is determined that the remains are Native American, the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent (MLD) from the deceased Native American. The MLD may then make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and associated grave goods as provided in Public Resources Code section 5097.98. The landowner or his authorized representative shall rebury the Native American human

remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance if:

a) The Native American Heritage Commission is unable to identify a MLD or the MLD failed to make a recommendation within 48 hours after being notified by the commission;
b) The descendent identified fails to make a recommendation; or
c) The landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
6. ENERGY. *Would the project:*					
(a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒	☐
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒	☐

Discussion

Overall conclusion: The CASP EIR provides project-level detail with respect to the proposed tentative subdivision map's energy-related impacts. The tentative map would

create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the energy-related impacts of the proposed tentative subdivision map.

Responses a.) and b.) The proposed project would use energy resources for the operation of project buildings (electricity and natural gas), for on-road vehicle trips (e.g. gasoline and diesel fuel) generated by the proposed project, and from off-road construction activities associated with the proposed project (e.g. diesel fuel). Each of these activities would require the use of energy resources. The proposed project would be responsible for conserving energy, to the extent feasible, and relies heavily on reducing per capita energy consumption to achieve this goal, including through statewide and local measures.

Businesses and residences living within the area covered by the proposed project will have to comply with all applicable Federal, State, and local regulations regulating energy usage. For example, PG&E, the electric and natural gas provider to the proposed project, is responsible for the mix of energy resources used to provide electricity for its customers, and it is in the process of implementing the statewide RPS to increase the proportion of renewable energy (e.g. solar and wind) within its energy portfolio. PG&E is expected to achieve at least a 33% mix of renewable energy resources by 2020, and 60% by 2030. Moreover, energy delivered by Community Choice Energy Providers such as Monterey Bay Community would provide carbon-free energy. Additionally, energy-saving regulations, including the latest State Title 24 building energy efficiency standards ("part 6"), would be applicable to the proposed project. These regulations would require the buildings constructed under the proposed project to achieve a high level of energy efficiency. For example, part 6 of the latest Title 24 building energy efficiency standards would require improvements for attics, walls, water heating, and lighting, as compared with the previous version of these standards. Other statewide measures, including those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g. the Pavley Bill and the Low Carbon Fuel Standard), would improve vehicle fuel economies, thereby conserving gasoline and diesel fuel. These energy savings would continue to accrue over time.

Furthermore, as described previously, the implementation of Mitigation Measures 3.1-1 through 3.1-14 (as provided by Section 3.1 Air Quality) would reduce project energy usage (including from electricity, natural gas, and on-road vehicle gasoline and diesel sources). Overall, the incorporation of mitigation measures would ensure that the proposed project would avoid and reduce inefficient, wasteful, and unnecessary consumption of energy. The proposed project would comply with all existing energy standards, including those established by the City of Salinas, the local air district (MBARD), and the State of California, and would not be expected to result in significant adverse impacts on energy resources. For these reasons, the proposed project would not cause an inefficient, wasteful, or unnecessary use of energy resources nor cause a

significant impact on any of the threshold as described by the *CEQA Guidelines*. This is a ***less than significant*** impact.

Applicable Mitigation from Prior EIR (if any)

No mitigation is required. The General Mitigation Measures discussed above imposed duties on the City of Salinas, and not on individual property owners within the CASP.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
7. GEOLOGY/SOILS. *Would the project:*					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☒	☐
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒	☐
(ii) Strong seismic ground shaking?	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
(iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒	☐
(iv) Landslides?	☐	☐	☐	☒	☐
(b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒	☐
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒	☐
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒	☐
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒	☐
(f) Directly or indirectly destroy a unique paleontological	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
resource or site or unique geologic feature?					

Discussion

Responses a-i), a-ii), a-iii), c): As the CASP Draft EIR explained on Page 1.0-17, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicate that there are no Alquist-Priolo Earthquake Fault Zones within the City of Salinas. The analysis cites a high risk of seismic activity and other geologic hazards associated with earthquakes in Salinas due to the region being seismically active; however, the analysis also indicates that there are no active faults within the Salinas Planning Area.

Liquefaction typically requires a significant sudden decrease of shearing resistance in cohesionless soils and a sudden increase in water pressure, which is typically associated with an earthquake of high magnitude. According to the Web Soils Survey (Natural Resources Conservation Service 2017), the soils in the Specific Plan Area have a high sand content in the soils. Given the high sandy soils, combined with the region being seismically active, the potential for liquefaction is present within the Specific Plan Area.

To minimize and mitigate the risks associated with seismicity, *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) presented the following six mitigation measures: Mitigation Measure GS1 requires the City to assess development proposals for potential hazards pursuant to the California Environmental Quality Act (CEQA), requiring mitigation measures to mitigate all identified public safety hazards; Mitigation Measure GS2 requires the City to use open space easements, buffers, and other techniques when necessary to avoid public safety hazards; Mitigation Measure GS3 requires the City to implement the most recent geologic, seismic, and structural guidelines; Mitigation Measure GS4 requires the City during the review of development proposals involving grading, unstable soils, and other hazardous

conditions, to require surveys of soils and geologic conditions be performed by a state licensed engineering geologist or civil engineer, where appropriate. Based on the results of the survey, design measures will be incorporated into projects to minimize geologic hazards; Mitigation Measure GS5 requires the City to implement the City's Multi-hazard Emergency Plan; and Mitigation Measure GS6 requires the City to coordinate with local agencies and organizations to provide emergency preparedness education and educational materials to its residents and businesses.

The City of Salinas requires a final geotechnical evaluation to be performed at a design level to ensure that the foundations, structures, roadway sections, sidewalks, and other improvements can accommodate the specific soils and anticipated seismic activity. The final geotechnical evaluation would include design recommendations to ensure that the combination of seismicity and soil conditions do not pose a threat to the health and safety of people or structures. In addition, all new construction in the City of Salinas is required to comply with the California Building Standards Code, which contains criteria and standards designed to reduce risks associated with seismicity to acceptable levels. In order to apply this code to site development, the City of Salinas requires that new construction be in accordance with building, grading and erosion control ordinances and include inspections during construction to ensure that design standards are met. The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) found that the General Plan goals, policies, and implementation programs, in combination with the Alquist-Priolo Act, California Building Standards Code, and City of Salinas requirements, would reduce potential impacts associated with surface fault rupture, seismic shaking, and seismic ground failure, to a less than significant level.

Any future development under the approved General Plan, which includes all development under the CASP, would be required to comply with the above referenced regulations, policies, and standards. Implementation of the CASP and tentative subdivision maps in furtherance thereof would not result in any new significant adverse impacts beyond those addressed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). This EIR for the Salinas Central Area Special Plans utilized the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) *and Final Supplemental for the Salinas General Plan Final Program* EIR (EDAW/AECOM 2007) pursuant to the tiering requirements of CEQA. As per the EIR, implementation of the CASP and related tentative subdivision maps would not result in any new significant adverse impacts beyond those addressed in the Final Environmental Impact Report, Salinas General Plan (Cotton Bridges Associates 2002) and *Final Supplement for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). Additionally, the *Final Supplement for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that impacts related to Geology and Soils associated with the FGAs, which includes the Specific Plan, would not be different from those discussed in the *Final Environmental*

Impact Report, Salinas General Plan (Cotton Bridges Associates 2002). This topic does not warrant additional analysis and will not be addressed further in the EIR.

Responses a-iv): The overall topographic relief of the Specific Plan Area is approximately 76 feet, with a maximum elevation of approximately 146 feet above sea level at the northeast corner on Old Stage Road, and a minimum elevation of approximately 70 feet above sea level in Natividad Creek at the Boronda Road crossing. Two creeks cross through the Specific Plan Area: Gabilan Creek to the west and Natividad Creek to the east. The greatest elevation changes within the Specific Plan Area occur along these creeks. However, the Specific Plan Area would have no slopes located outside of the planned Open Space and/or Park land uses that could be subject to significant landslide. Therefore, the potential for landslides to cause substantial adverse effects to people or structure in the Specific Plan Area is highly unlikely. As stated above, as per the Final EIR, implementation of the CASP and subsequent approvals implementing the CASP would not result in any new significant adverse impacts beyond those addressed in the Final Environmental Impact Report, Salinas General Plan (Cotton Bridges Associates 2002) and *Final Supplement for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). Additionally, the *Final Supplement for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that impacts related to Geology and Soils associated with the FGAs, which includes the Specific Plan, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002). This topic does not warrant additional analysis and will not be addressed further in the EIR.

Response b): The Specific Plan Area has a relatively low risk of landslides (a form of erosion). However, slopes adjacent to the Gabilan Creek and Natividad Creek are higher, and could undergo erosion under certain conditions. Additionally, all new development would require some land clearing, mass grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. Construction-related erosion could result in the loss of a substantial amount of nonrenewable topsoil and could adversely affect water quality in nearby surface waters.

The Regional Water Quality Control Board (RWQCB) requires a project specific Storm Water Pollution Prevention Plan (SWPPP) to be prepared for each project that disturbs an area one acre or larger. The SWPPPs include project specific best management measures that are designed to control drainage and erosion. Further, new construction in the Specific Plan Area would be required to comply with the City's National Pollutant Discharge Elimination System (NPDES) Permit requirements, the City's Storm Water Development Standards (SWDS), and City Public Works Standards, all of which are intended to reduce potential erosion impacts to a **less than significant level.**

To minimize the impacts on soil erosion and the loss of topsoil, the *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that

development within the General *Plan would potentially result in substantial soil and topsoil erosion from wind or water. The Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) provided mitigation for this impact that includes complying with MBARD guidelines to reduce emissions of fugitive dust and PM10 emissions. The *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) also identified that mitigation for this impact could also include performing geotechnical evaluations specific to the design of facilities to ensure that buildings and infrastructure is built safely. Site specific geotechnical evaluations will provide site specific design measures such as the soil compaction requirements, foundation designs, engineering fill requirements, and more specific design measures for each individual facility that is constructed.

Any future development under the CASP would be required to comply with the above referenced regulations, policies, and standards. Implementation of the CASP and associated tentative subdivision maps would not result in any new significant adverse impacts beyond those addressed in *the Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). As stated above, as per the Final EIR, implementation of the CASP and associated project approvals would not result in any new significant adverse impacts beyond those addressed in the Final Environmental Impact Report, Salinas General Plan (Cotton Bridges Associates 2002) and *Final Supplement for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). Additionally, the *Final Supplement for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that impacts related to Geology and Soils associated with the FGAs, which includes the Specific Plan, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002). This topic does not warrant additional analysis and will not be addressed further in the EIR.

Response d): Expansive soils are those that undergo volume changes as moisture content fluctuates; swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement and distorting structural elements. Expansion is a typical characteristic of certain varieties of clay-type soils. Expansive soils shrink and swell in volume during changes in moisture content, such as a result of seasonal rain events, and can cause damage to foundations, concrete slabs, roadway improvements, and pavement sections. The *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) identified that mitigation for this impact could include performing site-specific geotechnical evaluations to determine whether expansive soils would be a hazard.

The City of Salinas requires a final geotechnical evaluation to be performed at a design-level to ensure that the foundations, structures, roadway sections, sidewalks, and other improvements can accommodate the specific soils, including expansive soils. The final geotechnical evaluation would include design recommendations to ensure that soil conditions do not pose a threat to the health and safety of people or structures. Any

future development under the approved General Plan, which includes all development under and within the CASP, would be required to comply with the above referenced regulations, policies, and standards. Implementation of the CASP and associated tentative subdivision maps would not result in any new significant adverse impacts beyond those addressed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007).

Responses e): The proposed project would not result in the construction or installation of septic tanks or alternative wastewater disposal systems. Instead, the proposed project would be served by wastewater collection, conveyance, treatment, disposal, and recycling services through the City of Salinas and Monterey Regional Water Pollution Control Agency (MRWPCA). The sewer system for the CASP would consist of 8-inch to 12-inch pipes, designed in accordance with the City of Salinas design standards at the time of final design. The sewer mains will be located in public streets and private alleys with public service easements. The sewer mains will connect to the existing City of Salinas sewer system at two locations: the 10-inch sewer in Independence Boulevard, and the 18-inch sewer near Constitution Boulevard.

Applicable Mitigation from Prior EIR (if any)

No mitigation is required. The General Mitigation Measures discussed above imposed duties on the City of Salinas, and not on individual property owners within the CASP.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
8. GREENHOUSE GAS EMISSIONS. *Would the project:*					
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
a significant impact on the environment? (b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒	☐

Discussion

Overall conclusion: The CASP EIR provides project-level detail with respect to the proposed tentative subdivision map's effects resulting from greenhouse gas (GHG) emissions, in part due to the comprehensive character of the mitigation required to reduce such emissions. The tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the GHG-related impacts of the proposed tentative subdivision map.

Responses (a) and (b): Section 31-903.16 of the Municipal Code (*Energy Conservation*) requires that the design of a subdivision for which a tentative map is required shall provide, to the extent feasible, for future pass or natural heating or cooling opportunities in the subdivision

The CASP EIR explained that, consistent with Appendix G of the CEQA Guidelines, climate change-related impacts are considered significant if implementation of the Specific Plan would do any of the following:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The vast majority of individual projects do not generate sufficient GHG emissions to create a project specific impact through a direct influence to climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15355). For future projects, the significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds, or consistency with a regional GHG reduction plan (such as a Climate Action Plan).

The MBARD had previously recommended using the adopted San Luis Obispo (SLO) County APCD quantitative emissions bright-line threshold of 1,150 MT CO2e per year, or the SLO County APCD per capita emissions threshold of 4.9 MT CO2e/SP/year for year 2020 for most land use projects. However, independently calculated per capita emissions thresholds were derived, in conformance with the Newhall Ranch decision (*Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204), based on the GHG emissions included for land use-based sectors within California's 1990 GHG Inventory and future-year population and employment projections. These independently calculated per capita emissions thresholds (for Years 2040 and 2050) were utilized for the evaluation of operation-related emissions from the CASP. Therefore, in compliance with the Newhall Ranch decision, the project's contribution to cumulative impacts related to GHG emissions and climate change would be cumulatively considerable if the project would produce more than 1,150 MT CO2e per year in construction-related emissions, or 1.44 MT CO2e/SP/year in 2040, or 0.80 MT CO2e/SP/year in 2050, in operation-related emissions. In addition, a project that contributes to a net decrease in GHG emissions and is consistent with the reduction goals of Assembly Bill (AB) 32 and Senate Bill (SB) 32 is presumed to have a less than significant GHG impact.

Based on the discussion above, the following thresholds were applied to the analysis in the CASP EIR:

- For the evaluation of construction-related emissions, the SLO County APCD recommended mass emission threshold of 1,150 metric tons of CO2e per year is used.

- For the evaluation of operation-related emissions, for year 2040, the independently derived per capita emissions threshold of 1.44 MT CO2e/service population/year is used.

- For the evaluation of operation-related emissions, for year 2050, the independently derived per capita emissions threshold of 0.80 MT CO2e/service population/year is used.

Consistent with Appendices F and G of the CEQA Guidelines, energy-related impacts are considered significant if implementation of the Specific Plan would do the following:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation;

- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency;

In order to determine whether or not the CASP would result in a significant impact on energy use, the Final EIR included an analysis of CASP energy use (also see the Energy Section of the Final EIR).

Estimated unmitigated GHG emissions associated with construction of the Specific Plan were summarized in Table 3.4-1 of the Final EIR. These emissions include all worker vehicle, vendor vehicle, hauler vehicle, and off-road construction vehicle GHG emissions. For the purposes of this analysis, based on input from the project applicants, the CASP was assumed to commence construction in 2020 and occur through 2040, and full buildout of the Plan Area would be completed by 2040. It should be noted that this schedule was an approximation and was characterized as being subject to change over time. Buildout of the Specific Plan Area would occur based on market conditions, and therefore the pace of construction is expected to vary over time. Nevertheless, a regularized construction schedule was utilized for modelling purposes for the sake of simplicity. It should also be noted that the results provided in Draft EIR Table 3.4-1 incorporates the CalEEMod default assumptions for off-road construction equipment, which tend to represent an overestimate of project off-road construction equipment needs. Emission results in Table 3.4-1 therefore represent a conservative estimate of project construction-related GHG emissions.

As presented in the table, short-term CASP construction emissions of GHGs would be a low of approximately 620 in 2020 and a high of approximately 12,149 MT CO2e in 2022, emitted during the construction period (2020 through 2040). Construction GHG emissions tend to be highest during years when building construction activities would occur, as opposed to site preparation or other construction activities. As shown in Table 3.4-1, the CASP's construction emissions would exceed the mass emissions threshold of 1,150 MT CO2e/year for nearly all years of construction.

Per the Final EIR, the long-term operational GHG emissions estimate for the Specific Plan incorporates potential area source and vehicle emissions, and emissions associated with utility and water usage, and wastewater and solid waste generation. Estimated GHG emissions associated with the Specific Plan in 2040 are summarized in Table 3.4-2 and 3.4-3 of the Final EIR. As shown in those tables, the annual 2040 GHG emissions associated with the Specific Plan would be approximately 45,347.1 MT CO2e

without any mitigation incorporated and 40,134.3 MT CO2e with mitigation incorporated into the CASP (as provided by CalEEMod). These mitigation measures therefore represent a decrease of 5,212.8 MT CO2e in year 2040.

Estimated GHG emissions associated with the Specific Plan in 2050 were summarized in Table 3.4-4 and 3.4-5 of the Final EIR. It should be noted that the same Renewable Portfolio Standard (RPS) as estimated for year 2040 was estimated for year 2050. Additionally, CalEEMod is highly limited to the extent that it can account for year 2050 reductions in GHG emissions, given the long timeframe involved. Given emerging technologies (such as affordable electric vehicles) and the high likelihood of increased federal and/or State regulation between 2040 and 2050, per capita emissions are likely to decrease further over this timeframe. Therefore, the year 2050 emissions results represent a conservative estimate. As shown in the following tables, the annual 2050 GHG emissions associated with the Specific Plan would be approximately 44,744.0 MT CO2e without any mitigation incorporated and 39,729.0 MT CO2e with mitigation incorporated into the CASP (as provided by CalEEMod). These mitigation measures therefore represent a decrease of 5,014.6 MT CO2e in year 2050.

The significance thresholds for GHG emissions should be related to compliance with AB 32 and SB 32, and the City of Salinas, as lead agency, has chosen to utilize a threshold of significance for GHG emissions based on the guidance from the MBARD and the City of Salinas, and as required by the Newhall Ranch decision. This threshold was independently derived by De Novo Planning Group for the CASP EIR, based on statewide GHG emissions and future-year employment and population projections. The rationale for using this threshold is outlined in the subsection of the Final EIR for Greenhouse Gases, entitled "Thresholds of Significance".

As provided by the Central Area Specific Plan, development under the CASP is anticipated to support approximately 14,353 persons at project buildout. The CASP would also have approximately 734 employees at project buildout (based on up to 489,700 square feet of mixed use commercial at project buildout3, and an employment density factor of 667 square feet per worker4). Therefore, with a total projected service population of 15,087, unmitigated operational GHG emissions of 45,347.1 MT CO2e (in Year 2040), and mitigated operational GHG emissions of 40,134.3 MT CO2e (in Year 2040), the CASP would generate approximately 3.01 MT CO2e/service population/year (in Year 2040), for operational emissions, under the unmitigated scenario. Under the mitigated scenario, the CASP would generate approximately 2.66 MT CO2e/service population/year (in Year 2040). These values are above the derived threshold of 1.44 MT CO2e/service population/year for Year 2040.

For the purposes of the analysis of the CASP as a whole, the service population in Year 2050 is assumed to be same as in Year 2040. Under such a scenario, unmitigated GHG emissions per service population in Year 2050 would be approximately 2.97 MT CO2e/service population/year, and mitigated GHG emissions would be 2.63 MT CO2e/service population/year. However, the service population threshold applied for

Year 2050 is lower than in Year 2040, at 0.80 MT CO2e/service population/year (and therefore more difficult at to achieve as compared to Year 2040). The GHG emissions modelled for Year 2050 would exceed this threshold by a substantial margin.

As described above, it is expected that the CASP's GHG efficiency in the Year 2050 would be improved beyond that of Year 2040, given the high likelihood of technological progress of the next approximately thirty years, which would provide opportunities for additional reductions in per capita GHG emissions. One example of this is the likelihood of substantially increased electrification of vehicles from 2040 to 2050. Additionally, regulatory trends, such as increases in State renewable energy procurement requirements (i.e. the State RPS) may reduce per capita emissions from the use of electricity even further from 2040 to 2050, which would have a large effect on overall per capita GHG emissions of projects in California. Overall, full implementation of the *California's 2017 Climate Change Scoping Plan* by Year 2050 would greatly reduce GHG emissions in California. While it is unknown at this time what kind of technological innovations and/or additional regulatory standards would reduce GHG emissions from 2040 to 2050, and by what amount, it is expected that the per capita GHG efficiency of the CASP in 2050 would be substantially lower than that as modelled by CalEEMod.

Per the Final EIR, short-term construction GHG emissions are a one-time release of GHGs and are not expected to significantly contribute to global climate change over the lifetime of the Specific Plan. Additionally, the implementation of the mitigation measures presented in Section 3.1: Air Quality in the Final EIR it would reduce the overall annual GHG emissions associated with the Specific Plan.

The mitigation measures presented in Section 3.1: Air Quality require traffic calming measures, preferential carpool/vanpool parking spaces, and other actions meant to reduce vehicle miles travelled. The mitigation measure provided in Section 3.1: Air Quality require the consideration and implementation of feasible alternative energy infrastructure within the Plan Area. The mitigation measures presented in Section 3.1: Air Quality also ensure that the project proponent would consider and implement feasible strategies to encourage alternative energy use (e.g. solar PV) within the Plan Area. Consistent with the CASP and associated mitigation requirements, the proposed project would be required to use water efficient fixtures in all buildings, utilize water-efficient irrigation systems, as well as coordinate with the MBARD to consider the implementation of bicycle rental opportunities within the Plan Area.

Nevertheless, even after incorporation of the mitigation measures provided in Section 3.1: Air Quality, overall GHGs generated by the CASP are expected to be greater than the applicable thresholds of 1,150 MT of CO2e per year for construction emissions, 1.44 MT CO2e/service population/year for operational emissions during Year 2040, and 0.80 MT CO2e/service population/year for operational emissions during Year 2050.

To lessen the significant GHG effect of the CASP, the Specific Plan and subsequent discretionary approvals such as tentative subdivision maps would be required to

implement the Mitigation Measure 3.4-1. This mitigation measure would ensure that the City is demonstrating progress towards meeting post-2020 and post-2030 State GHG emissions reduction goals. The mitigation measure incorporates the recognition that the GHG emissions reduction landscape will change over time by requiring impacts of individual future development projects within the Plan Area to be assessed and mitigated through the CEQA process consistent with GHG reduction plans in effect at the time the individual projects are proposed. Each individual project would be required to develop a Greenhouse Gas Reduction Plan (GGRP), which would serve as a project-specific plan for the reduction of GHGs associated with individual projects. Individual projects would need to demonstrate consistency with a GHG threshold of significance, such as the per capita emissions thresholds derived under the previous "Thresholds of Significance" subsection, of 1.44 MT CO2e/service population/year for operational emissions during Year 2040, and 0.80 MT CO2e/service population/year for operational emissions during Year 2050, as feasible.

The proposed project would generate GHG emissions, directly and indirectly, that may have a significant impact on the environment. While the following mitigation measure would result in reduced GHGs, it is possible that individual projects within the Plan Area may not achieve GHG reductions needed for their individual impacts to be less than significant. Therefore, although the CASP and the proponents of individual tentative maps would be required to implement the following mitigation measure, the Specific Plan was deemed to have a ***significant and unavoidable*** impact on the potential to generate GHG emissions that may have a significant impact on the environment.

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To date, neither the City of Salinas, nor any regional agency has prepared a qualified GHG reduction plan that is applicable to the proposed project. In addition, the City's current General Plan does not contain policies adopted for the purpose of reducing GHG emissions, including GHG emissions from development within the Specific Plan. The following provides an analysis of the CASP's consistency with (1) the current version of the statewide Scoping Plan, (2) Executive Orders B-30-15 and S-03-05, and (3) 2008 Monterey Bay Regional Energy Plan. **Consistency with the CARB's *California's 2017 Climate Change Scoping Plan*:** In accordance with AB 32, the CARB developed the first Scoping Plan in 2008 to outline the State's strategy to achieve 1990 level emissions by year 2020. In May 2014, the CARB released and adopted the *First Update to the Climate Change Scoping Plan* to identify the next steps in reaching AB 32 goals and evaluate the progress that has been made between 2000 and 2012. A new version of the Scoping Plan was then adopted by the CARB in December 2017 (entitled *California's 2017 Climate Change Scoping Plan*). Since adoption of the 2008 Scoping Plan and the subsequent updates in 2014 and 2017, State agencies have adopted programs identified in the plan, and the Legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy Efficiency regulations, California Building Standards (e.g., CALGreen and the 2016 Building and Energy Efficiency Standards), the Renewables Portfolio Standard (RPS),

and changes in the corporate average fuel economy standards (e.g., Pavley I and California Advanced Clean Cars).

The new buildings constructed and operated within the Specific Plan Area would be significantly more energy efficient than the current buildings in the surrounding area, many of which were constructed under previous versions of the Title 24 energy code. Likewise, plumbing fixtures and landscaping installed as part of the project would result in a decrease in per capita water use compared to existing land uses throughout the City and the region. The proposed project would also need to operate in accordance with the goals of AB 341, which requires a 75 percent diversion rate of waste from landfills. Once development occurs within the boundaries of the CASP, the Specific Plan Area would become part of existing development within the State that can be subjected to a variety of future State or federal GHG reduction measures intended to target existing development to the extent they are legally applicable, such as a more stringent RPS. Thus, to the extent that California may choose to require that more than 50 percent of its electricity be generated with renewable energy resources such as solar and wind, the electricity supplied to the project site could get cleaner and cleaner over time, without any need for any further actions by landowners within the Specific Plan.

Additionally, the Plan Area's operational emissions would be reduced as additional regulations are implemented by the CARB and other State agencies to comply with the statewide GHG reduction targets. For example, the project's transportation emissions would be expected to decline as vehicle efficiency standards are implemented beyond the Advanced Clean Cars program and the Low Carbon Fuel Standard is strengthened. Therefore, CASP emissions would continue to decline beyond the buildout year due to regulations that would indirectly affect project emissions. Therefore, recognizing the CARB as an authoritative substantial evidence source in evaluating post-2020 GHG impacts, the analysis in the Final EIR also evaluated whether buildout of the Specific Plan would interfere with the main programs the CARB has identified to support is conclusions that the State is on a trajectory to meet the 2030 and 2050 GHG targets – (1) initiative to install 12,000 MW of renewable distributed energy by 2020; (2) the California Building Standards Commission's goal to construct net zero energy homes after 2020; (3) existing building retrofits under AB 758; (4) the reduction in GHG emissions in the electricity sector through the implementation of the 50 percent RPS under SB 350; (5) the ongoing implementation of the Low Carbon Fuel Standard (LCFS); (6) the reduction in GHGs and other pollutants from the transportation sector through the Mobile Source Strategy; (7) the approval and implementation of the Short-Lived Climate Pollutant strategy under SB 1384; (8) implementation of the California Sustainable Freight Action Plan; and (9) implementation of the Specific Plan is not expected to interfere with the State's goal to install 12,000 MW of renewable distributed generation systems by 2020. As of November 1, 2017, almost 10,520 MW of distributed generation capacity was operating or installed in California, with an additional 440 MW pending (CEC, 2017). The data include about 5,900 MW of behind-themeter solar, which far exceeds the State's California Solar Initiative (CSI) goal of 3,000 MW on residential and commercial sites by the end of 2016. In addition, California's existing

programs aimed at supporting renewable distributed generation could add another 1,600 MW, if fully subscribed (CEC, 2017).

Likewise, the Specific Plan is not anticipated to interfere with the ability of the California Building Standards Commission's goal of constructing net-zero energy homes after 2020, including the requirement that new homes built in California after Jan 1, 2020 must be equipped with a solar electric system. The Specific Plan is expected to be achieve full buildout by approximately 2040 and would be constructed to comply with existing building energy standards at the time building permits are obtained. Therefore, the project would not interfere with the State's ability to mandate net-zero energy homes for new construction after 2020.

Moreover, buildout of the Specific Plan would not interfere with the State's implementation of building retrofits to further energy efficiency for existing buildings under AB 758. AB 758, the Comprehensive Energy Efficiency in Existing Buildings Law, tasked the CEC with developing and implementing a comprehensive program to increase energy efficiency in existing residential and nonresidential buildings that "fall significantly below the current standards in Title 24." (Pub. Resources Code, section 25943(a)(1).) Approximately 50 percent of existing residential and nonresidential buildings in California were constructed before California Building Energy Efficiency Standards went into effect in 1978. Other buildings constructed after 1978 also fall below current Title 24 standards and represent significant opportunities for energy efficiency improvements. Pursuant to AB 758, the CEC has developed an Existing Buildings Energy Efficiency Action Plan that identifies strategies to implement energy efficient renovations for such existing commercial, residential, and publicly owned buildings. Development under the proposed project would be constructed in compliance with the applicable Title 24 standards and, therefore, would not interfere with CEC or other initiatives implemented to increase energy efficiency and reduce GHG emissions associated with buildings that do not adhere to Title 24 standards. The Specific Plan and associated tentative subdivision maps would not interfere with the RPS, since they would not affect any retail seller of electricity. In addition, the State is well on its way to meeting the 50 percent RPS requirement by 2030, according to data available from the CPUC (CPUC, 2018).

Per the Final EIR, the Specific Plan would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, as described above. With implementation of the mitigation measures provided within Section 3.1: Air Quality and with implementation of Mitigation Measure 3.4-1, there would be a ***less than significant*** impact. **Impact**

The City of Salinas must weigh the economic and social benefits of development against the environment impacts associated with development. The City of Salinas's planning efforts included targeted growth that accommodates the economic and social needs of the community, while recognizing and seeking to mitigate environmental impacts when growth occurs.

The use of New Urbanism principles, which emphasize compact, walkable communities, and which were incorporated into the design of the CASP, will help minimize GHG emissions generated by the proposed project. Further, the proposed project would be required to implement mitigation measures that are intended to reduce GHG emissions to the maximum extent feasible. The State of California continues to implement measures that are intended to reduce emissions on a State-wide scale (i.e. vehicle fuel efficiency standards in fleets, low carbon fuels, etc.) that are consistent with AB 32 and SB 32. These types of statewide measures will benefit the proposed project (and City as a whole) in the long-term as they come into effect; however, the City does not have the jurisdiction to create far-reaching (i.e. statewide) measures to reduce GHG emissions. On a project-by-project case, the City of Salinas evaluates a project and the potential to impose project specific mitigation, which has been done through this GHG analysis. However, because it is possible that individual projects within the Specific Plan Area may not achieve GHG reductions needed for their individual impacts to be less than significant, implementation of the Specific Plan was determined to have a ***cumulatively considerable contribution*** and ***significant and unavoidable*** impact to GHGs.

Applicable Mitigation from Prior EIR (if any)

The following Mitigation Measures for Greenhouse Gas Emissions stated in the adopted Final Mitigation Monitoring and Reporting Program from the Final Environmental Impact Report for the Salinas Central Area Specific Plan dated November 2020 shall be required for any future development in the project area:

Mitigation Measure 3.4-1:

Prior to the approval of the tentative maps, conditional use permits or site plan review, as applicable, the project applicant shall prepare a Greenhouse Gas Reduction Plan (GGRP) aimed at achieving specific performance standards. The GGRP may be prepared pursuant to CEQA Guidelines section 15183.5(b) and shall include the following:

1) The GGRP shall, if feasible, achieve a per capita operational emissions level of 1.44 MT CO2e/service population/year by year 2040, and 0.80 MT CO2e/service population/ year by year 2050.

2) Calculation of GHG emissions projection using an acceptable modeling tool such as the most recent version of CalEEMod.

GHG reduction measures may include building and site energy reduction measures, measures to reduce project-generated vehicle miles traveled, or other measures. Off-site measures such as participation in a community-wide GHG reduction program(s), if any are adopted, or payment of GHG reduction fees (carbon offsets) into a qualified existing program, may be considered after all feasible on-site reduction measures are

considered. Any carbon offsets must be real, quantifiable, permanent, verifiable, enforceable, and additional, consistent with the standards set forth in Health and Safety Code section 38562, subdivisions (d)(1) and (d)(2). Such offsets shall be based on protocols consistent with the criteria set forth Section 95972, subdivision (a) of Title 17 of the California Code of Regulations, and shall not include offsets originating outside of California, except to the extent that the quality of the offsets, and their sufficiency under the standards set forth herein, can be verified by the City and/or the Monterey Bay Air Resources District (MBARD). Such credits must be purchased through one of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard; (ii) any registry approved by CARB to act as a registry under the California Cap and Trade program; or (iii) through the CAPCOA GHG Rx and any program adopted the MBARD. The effectiveness of the GHG reduction measures included in the GGRP must be verifiable based on evidence presented in the GGRP. Representative GHG reduction measures which may be considered may include, but are not limited to:

- Measures identified by the California Air Pollution Control Officers' Association in Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures or updates to this document as may occur from time to time.

- Applicable measures identified in guidance from MBARD, if any, and/or in guidance provided by the California Air Resources Board, other regional air districts such as the Bay Area Air Quality Management District, Sacramento Metropolitan Air Quality Management District, San Luis Obispo County Air Pollution Control District, or other agencies with adopted GHG reduction guidance that is applicable on the date the project application is deemed complete by the City.

If the project applicant concludes that sufficient feasible GHG reduction measures are unavailable to reduce GHG emissions to below the threshold of significance (i.e., per capita operational emissions level of 1.44 MT CO2e/service population/year by 2040, and 0.80 MT CO2e/service population/year by 2050), the project applicant shall include substantial evidence in the GGRP to this effect. The GGRP shall be subject to review and approval of the City of Salinas Community Development Department prior to approval of the tentative map or development review application, as applicable. Where the applicant concludes that the GGRP meets the threshold of significance, the Community Development Department shall determine whether, in its independent judgment, the GGRP actually does meet the threshold of significance, and shall ensure that all proposed measures will be effective and enforceable. In determining whether, as the applicant may assert, sufficient feasible GHG reduction measures are unavailable to reduce GHG emissions to below the threshold of significance, the Community Development Department shall determine, in its independent judgment, whether there might be additional feasible measures, including qualifying carbon offsets, available to

meet the thresholds of significance. In making this determination, the Community Development Department shall consider the feasibility of imposing additional measures, including requiring the applicant to purchase any additional qualifying carbon offsets that might be available in the marketplace or through development of a local or regional program that could produce additional qualifying offsets. "Feasibility" in this context shall focus on the technical viability and overall cost of such additional measures, including carbon offsets, and, specifically, whether such measures (i) are technologically feasible, (ii) would substantially increase the cost of proposed housing, or (iii) would render the proposed project economically infeasible within the meaning of CEQA case law such as Uphold Our Heritage v. Town of Woodside (2007) 147 Cal.App.4th 587, 598-601. After the Community Development Department has approved a GGRP, the GGRP shall be forwarded to the City Planning Commission for its consideration and potential approval. The Planning Commission shall consider the GGRP at a noticed public hearing or meeting at which public testimony shall be considered. Any decision of the Planning Commission approving, conditioning, or denying a GGRP may be appealed to the City Council within 10 days of the Planning Commission decision. Upon appeal, the City Council shall consider the GGRP at a noticed public hearing or meeting at which public testimony shall be considered.

Implementation of this mitigation measure shall not be required if the City has a qualified GHG reduction plan in place on the date a future individual project application subject to the GHG reduction plan is deemed complete, the qualified GHG reduction plan reflects the most recent legislatively adopted GHG reduction targets (e.g., the 2030 target set by SB 32), includes an inventory of projected GHG emissions from development within the Plan Area, and includes GHG reduction measures applicable to development within the Plan Area whose implementation is required as a condition of approval of such projects.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable.

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
9. HAZARDS & HAZARDOUS MATERIALS. *Would the project:*					
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒	☐
(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒	☐
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒	☐
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒	☐
(e) For a project located within an airport land use plan or, where such a plan has not	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?					
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒	☐
(g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒	☐

Discussion

Overall conclusion: The CASP EIR provides project-level detail with respect to the proposed tentative subdivision map's effects relating to hazards and hazardous materials, in part due to the mitigation measures required to reduce such effects. The tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the impacts of the proposed tentative subdivision map relating to hazards and hazardous materials.

Responses a-c): As the CASP Draft EIR explained on Page 1.0-18, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) The CASP is an approximately 760-acre Specific Plan Area that includes residential, mixed use commercial, public facilities, parks, and open space which include supplemental storm water detention/retention basins. These uses are not expected to

create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Additionally, these uses are not expected to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. While the CASP includes three school sites within its boundaries, the land uses are not expected to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Implementation of the proposed project would have a less then significant impact relative to these topics.

The Specific Plan Area is not anticipated to have businesses or uses that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. New and existing infrastructure would be located near existing and planned schools within the Specific Plan Area. The Specific Plan Area (at buildout) includes two elementary schools, and one middle school (see Sections 2.0 Project Description, and Section 3.9, Public Services, in the Final EIR for additional details on schools within the Planning Area). Existing and planned infrastructure that relates to hazards located within close proximity to proposed schools include:

- Water well construction and operation.
- Natural Gas Pipelines (existing as shown on Figure 3.5-1 of the Final EIR).
- Overhead and electrical transmission lines (existing lines located along Boronda Road, proposed realignment along El Dorado Drive as shown in Section 2.0, Figure 2-4 of the Final EIR).

An existing PG&E electric substation (which will be expanded) is located in the north central portion of the Specific Plan Area, near the future extensions of Russell Road and Hemingway Drive. The expanded PG&E substation site will comprise approximately 4.5 net acres of land within the Specific Plan Area, plus a 2.4-acre 50-foot wide landscaped buffer surrounding the existing and new PG&E facilities and the Cal Water wells, storage, and water treatment facilities.

The other Cal Water well, storage, and water treatment facility is located just west of the proposed Alisal Elementary School site on an approximately 0.25-acre site next to the park. Alisal Water Corporation (ALCO) anticipates the need for three booster stations located along and within their easement for their 30" low pressure main, which runs through the center of the project adjacent to the PG&E tower line easement. Proposed facilities (along with any treatment facility if required) will be subject to the approval of a Conditional Use Permit by the City, and are subject to standards and permitting requirements of the Monterey County Health Department as described below in Mitigation Measure 3.5-3.

Responses d): The EIR will include a hazards analysis with a screening-level of Phase

II Environmental Site Assessment (ESA) (limited soil sampling). The hazards analysis will include a review of existing ESAs and any other relevant studies for the Specific Plan Area to obtain a historical record of environmental conditions. The analysis will also include a review of recent records and aerial photographs. A site reconnaissance will be performed to observe the Specific Plan Area and potential areas of interest. Public agencies will be interviewed to gather information on the current and historical use of the properties. If environmental conditions are identified, mitigation measures, as applicable, will be identified to address the environmental conditions. This section will provide an analysis including the methodology, thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts associated with hazards and hazardous materials.

A Phase I ESA was performed for the Specific Plan Area. The majority of the Specific Plan Area is currently in agricultural production and used extensively for row crops (strawberries, lettuce, raspberries, broccoli, etc.). Residential and agricultural-related buildings are located on the western portion of the Specific Plan Area. Agricultural equipment yards are located in the general vicinity of the buildings and throughout the remainder of the Specific Plan Area. The agricultural buildings and equipment yards are utilized to support the agricultural operations and some have been used or are currently being used to temporarily store fertilizers, pesticides, diesel fuel, gasoline, waste oil, and other materials normally associated with ongoing agricultural cultivation.

Due to the long-term use of the land for agricultural purposes, the Specific Plan Area has the potential for certain environmental conditions related to pesticide application that could have caused these chemicals to be present in the soil. However, the results of environmental site investigations completed for three proposed school sites in the western and central portions of the Specific Plan Area under oversight of the DTSC did not encounter pesticide levels in shallow soil above regulatory screening levels.

The Phase I ESA identified the following RECs in connection with the Specific Plan Area:

- Current and historical use of the Specific Plan Area as agricultural lands and application of pesticides may have had impacted site soils with residual OCPs and associated elevated arsenic concentrations.

- Soil in the area of the residences and structures used to support the agricultural operations may be negatively impacted by metals (specifically lead from lead-based paint on older buildings); OCPs from termiticide application; and PCBs from window caulking or glazing in old buildings.

- The onsite structures may contain asbestos-containing building materials and lead containing paint.

- A gasoline UST is registered for the Settrini Ranch at 250 Natividad Road (APNs 211-013-003 or -010 and -011). A gasoline UST was further observed at the ranch compound on APN 153-091-001 in addition to gasoline and diesel ASTs. A diesel AST was observed on APN 153-091- 015. Diesel and oil ASTs and drums were further observed on APN 153-091-010.

- Soil in the vicinity of the former electrical substation on APN 211-013-012 may contain PCBs associated with former transformers.

A Phase II ESA was conducted to evaluate the potential presence of OCPs and arsenic (chemicals of potential concern, COPC) in shallow onsite soils due to the historic agricultural use within the Specific Plan Area. The Phase II ESA included analysis of surface soil samples collected from areas throughout the Specific Plan Area.

The results of the Phase II ESA show that residual OCP concentrations are present in the onsite shallow soils, but at concentrations less than USEPA residential Regional Screening Levels (RSLs). Reported arsenic concentrations are within the range of naturally occurring background levels. Additional assessment of soil in the Specific Plan Area's agricultural fields for OCPs and arsenic does not appear to be warranted at this time. Polychlorinated biphenyls (PCBs) related soil impacts (associated with pole-mounted transformers) may exist at the fenced former substation located on the southern portion of APN 211-013-012. Either documentation of completed investigations/mitigation or current soil sampling and analytical testing will be required to determine if subsurface impacts require further assessment or remediation prior to planned development.

Depending on the anticipated future use of the Specific Plan Area parcels, evaluation of the soil around the agricultural operations support buildings (residences, warehouses, barns, etc.) for lead and termiticides should be considered before they are demolished or around the perimeters of the foundations if structures have already been removed. Additionally, based on the age of these structures, it is possible that asbestos-containing materials and/or lead-containing paint are present in the building materials. An asbestos-containing materials and lead-containing paint survey should be considered prior to demolition of the Specific Plan Area structures. Any unused agricultural and domestic wells in the Specific Plan Area will require proper abandonment per Monterey County permit requirements prior to planned development. Any undocumented subsurface features encountered during development-related construction excavations including USTs, wells, sumps, septic systems, asbestos-containing pipe, debris dumps, treated wood waste, etc., will require proper removal in accordance with any applicable regulatory permit requirements.

Per the Final EIR, the hazards assessments included site reconnaissance, interviews, historical land use research, database research, and soils testing. The project has the potential to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it

create a significant hazard to the public or the environment. The following mitigation measures will reduce the potential risk of hazards as identified in the hazard's assessment. With implementation of the following mitigation measures, the proposed project would have a ***less than significant*** impact with regards to this environmental issue.

Two privately owned public utility companies provide domestic water service to the City of Salinas: Alisal Water Corporation (ALCO) and Cal Water. The current division of service areas splits the Central Area Specific Plan in half approximately along the PG&E powerline with ALCO serving the eastern half and Cal Water serving the western half of the Specific Plan Area. Both ALCO and Cal Water have produced Water Supply Assessments (WSA) per the requirements of Senate Bill 610 (Stats. 2001, ch. 643) (Wat Code, § 10910 et seq; see also CEQA Guidelines, § 15155) (see **Appendix G** of the Final EIR). ALCO and Cal Water have submitted a "Will Serve" letters indicating that they can provide water service to the proposed Specific Plan Area. As development of the Specific Plan occurs, existing agricultural wells will be taken out of production.

Two Cal Water wells are planned be installed within the Specific Plan Area. According to Cal Water's Assessment Report, it is expected that the proposed wells within the Specific Plan Area have a high probability of meeting current drinking water quality standards. As a hedge against possible future changes in water quality, Cal Water may make provisions for on-site treatment with the design of the wells for the Specific Plan development. To ensure high quality drinking water, Cal Water tests its municipal source water at the source and in the distribution system for compliance with drinking water standards. In 2015, Cal Water conducted tests on approximately 68,000 water samples to ensure compliance with both State and federal drinking water standards. Additionally, all well sites will be screened from adjacent uses and to limit access to the well sites. This access exclusion minimizes potential hazards to adults or children as a result of well placement. The well sites are also subject to drainage plan requirements to prevent flooding from storm events or well failure. It is not anticipated that well failure would result in flooding given the continual maintenance regime during operational use.

However, in the event of a failure, flooding would be directed into the storm drainage system to prevent flooding. The likelihood of a well causing flooding is considered low, given that the well pump would be shut down in the event of any failure, and without the pump there would not be significant pressure to cause significant flooding. PG&E operates an existing 4.0-inch steel natural gas transmission pipeline located along Rogge Road and Natividad Road on the western perimeter of the Specific Plan Area.

The locations of natural gas transmission pipelines near the Specific Plan Area are shown on Figure 3.5-1 of the Final EIR. California Code of Regulations (CCR) Title 5, Article 2 (School Sites) § 14010 (Standards for School Site Selection) (h) identifies that sites shall not be located near an above-ground water or fuel storage tank or within 1,500 feet of the easement of an above ground or underground pipeline that can pose a safety hazard as determined by a risk analysis study. Education Code section 17213

(a)(3) states that pipelines carrying natural gas to supply the school site or neighborhood are permitted, and the CCR Title 5, Article 2 § 14011 requires a school district, in selecting a site for a new school, to issue written findings stating that the Specific Plan Area does not contain pipelines which carry hazardous wastes or substances other than a natural gas supply line to that school or neighborhood. The natural gas pipeline network is designed to provide adequate distribution of natural gas to meet the demands of residents within the City of Salinas and the Specific Plan Area. Any future development of school sites would be required to comply with school siting standards including potential requirements for a site-specific gas pipeline risks analysis. Additionally, CCR § 14010 (d) places additional standards if the proposed school site is within 1,500 feet of a railroad track easement, and includes the presence of high pressure gas lines near the tracks that could rupture in the event of a derailment.

The nearest railroad lines are located along the southern portion of the City, approximately 2.5 miles from the Specific Plan Area at the nearest point. Thus, rail operations would not impact safety or school site selection in relation to nearby natural gas infrastructure in the Specific Plan Area.

Monterey Bay Community Power is the primary provider of electrical services to the City of Salinas. Pacific Gas and Electric Company (PG&E) also provides electrical services to the City of Salinas. PG&E indicates that sufficient primary line power service exists in close proximity to the proposed development area. PG&E currently operates a 12-kV overhead power line along Old Stage Road and Williams Road. A 12 kV underground primary line exists along Boronda Road. PG&E also maintains 112 kV transmission lines and corresponding easements along the northwest side of Old Stage Road, westerly along the proposed Russell Road alignment, and southerly down the middle of the Specific Plan Area. As mentioned previously, PG&E plans to install a substation near the intersection of the proposed Russell Road alignment and the central north to south transmission lines. The substation will be subject to the City's approval of a Conditional Use Permit in accordance with Article 6, Division 8 of the Zoning Code to ensure compatibility with adjacent uses. The California Code of Regulations Title 5, Article 2 (School Sites) § 14010 (Standards for School Site Selection) (c) requires setbacks from overhead power lines by transmission type.

The CASP Mitigation Monitoring and Reporting Program includes mitigation measures that ensure water well construction comply with standards and requirements for well construction established by the Monterey County Health Department. Operation of onsite wells will be regulated by Cal Water and will include water quality testing to ensure that water quality meets State and federal drinking water standards. Additionally, well uses within the Specific Plan Area will be screened from adjacent uses.

CONCLUSION

As described previously, the CASP and approvals implementing it do not pose significant hazards from existing natural gas transmission piping, and mitigation

measures identified previously in the Final EIR would ensure water well construction and abandonment impacts would be less than significant. However, implementation of the project may create a hazard to school sites due to siting or the placement of infrastructure (i.e., the due to the citing of school sites near power lines). The following mitigation measures ensures all future electrical transmission alignments are required to comply with California Code of Regulations Title 5, Article 2 (School Sites) § 14010 (Standards for School Site Selection) setback requirements. As such, Implementation of the proposed project would have a ***less than significant*** impact with regards to this environmental issue. The proposed project, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Monterey County), would not be expected to cause any significant cumulative impacts. The proposed project would not have cumulatively considerable impacts associated with hazards and hazardous materials. As such, implementation of the proposed project would have a ***less than significant*** and ***less than cumulatively considerable*** contribution to hazards and hazardous materials.

Responses e-f): The proposed project is not located in the vicinity of an airport or private airstrip; therefore, it would not result in a safety hazard related to air traffic for people residing or working in the Specific Plan Area. Implementation of the proposed project would have no impact relative to this environmental topic.

Responses g): The City has adopted a Multi-hazard Emergency Plan, which serves as extensions of the California Emergency Plan and the Emergency Resource Management Plan. The purpose of the Multihazard Emergency Plan is to respond to emergency situations with a coordinated system of emergency service providers and facilities. The Emergency Operations Center (EOC) in Salinas serves as the center of the City's emergency operations. The Plan also addresses evacuation and movement of people in the event of an emergency. The proposed project does not impair implementation of or physically interfere with the Multi-hazard Emergency Plan. Implementation of the proposed project would have a less than significant impact relative to this environmental topic.

Responses h): The CASP is not located in an area that is considered a high risk for wildfires. The proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Implementation of the proposed project would have a less than significant impact relative to this environmental topic.

Applicable Mitigation from Prior EIR (if any).

The following Mitigation Measures for Hazards and Hazardous Materials stated in the adopted Final Mitigation Monitoring and Reporting Program from the Final Environmental Impact Report for the Salinas Central Area Specific Plan dated November 2020 shall be required for any future development in the project area:

Mitigation Measure 3.5-1: Prior to issuance of grading permits or building permits, (including the issuance of demolition permits for agricultural support buildings) as applicable, the applicant shall hire a qualified consultant to:

1) Provide a final evaluation of the soils around the agricultural operations support buildings (residences, warehouses, barns, etc.) before they are demolished. If toxic levels of residual agrichemicals or surface staining are found, the contaminated soil shall be excavated and disposed of at an off-site disposal facility permitted to accept such waste. Any contaminated areas shall be remediated by the project applicant in accordance with recommendations made by the Monterey County Health Department Hazardous Materials Management Services, Regional Water Quality Control Board, Department of Toxic Substances Control, or other appropriate federal, State, or local regulatory agencies.

2) Investigate structures for asbestos-containing materials and lead. If asbestos containing materials and/or lead are found in the buildings, or around the perimeters of the foundations if structures have already been removed, a Cal-OSHA certified ACBM and lead based paint contractor shall be retained to remove the asbestos-containing materials and lead in accordance with U.S. EPA and California Occupational Safety and Health Administration (Cal/OSHA) standards. In addition, all activities (construction or demolition) in the vicinity of these materials shall comply with Cal/OSHA asbestos and lead worker construction standards. Any ACBM and lead shall be disposed of properly at an appropriate offsite disposal facility.

   In addition, any construction activity that involves the disturbance or removal of building materials or structures must be thoroughly inspected for asbestos by a California Certified Asbestos Consultant (CAC) prior to the construction activity, as regulated by the Federal EPA Asbestos NESHAP (National Emission Standards of Hazardous Air Pollutants) and Air District Rule 424. Work to remove any regulated quantities of asbestos must be notified to the Air District at least 10 working days prior to the beginning of work.

   Any load-bearing removal in the structures is defined as a demolition activity by the Federal EPA Asbestos NESHAP regulation and District Rule 424. This activity must also be notified to the Air District at least 10 working days prior to the beginning of work.

3) The two known gasoline USTs located on APNs 211-013-003 or -010 and -011 and APN 153-091-001 shall require proper removal in accordance with Monterey County permit requirements prior to planned development. Any unused fuel and oil ASTs and containers located in the vicinity of the agricultural buildings and equipment yards shall be properly removed and recycled or disposed of. Any associated petroleum hydrocarbon subsurface

impacts associated with the USTs, ASTs and fuel and oil containers/storage areas shall require proper removal in accordance with all applicable regulatory requirements and recommendations by the Monterey County Health Department Hazardous Materials Management Services, Regional Water Quality Control Board, Department of Toxic Substances Control, or other appropriate federal, State, or local regulatory agencies.

4) Investigation and reporting for Polychlorinated biphenyls (PCBs) related soil impacts (associated with pole-mounted transformers) at the fenced former substation located on the southern portion of APN 211-013-012 shall be required prior to disturbance of the area. Soil sampling and analytical testing shall be required to determine if subsurface impacts require further assessment or remediation prior to planned development. If the investigation and analytical results of the soil samples determines the soils contain threshold levels of PCBs, materials must be disposed of as a hazardous waste and shall require proper removal in accordance with all applicable regulatory requirements and recommendations by the Monterey County Health Department Hazardous Materials Management Services, Regional Water Quality Control Board, Department of Toxic Substances Control, or other appropriate federal, State, or local regulatory agencies.

5) Observations and a screening level Phase II ESA soil sampling and analytical testing shall be completed for APNs 211-013-003, -007, -010, and -011 prior to any development approvals. Any contaminated areas shall be remediated by the project applicant in accordance with recommendations made by the Monterey County Health Department Hazardous Materials Management Services, Regional Water Quality Control Board, Department of Toxic Substances Control, or other appropriate federal, State, or local regulatory agencies.

Mitigation Measure 3.5-2: Prior to the issuance of grading permits, existing water wells within the grading area shall be destroyed under permit from the City of Salinas and/or the Monterey County Health Department, as applicable. Any destruction of these facilities shall be in accordance with the Monterey County Well Standards for Abandonment/Destruction. The project applicant shall provide the City of Salinas with a copy of the permit and a report or other information documenting the appropriate destruction of these facilities.

Mitigation Measure 3.5-3: Prior to the issuance of building permits, the water well or wells that will be providing water for the applicable portion of the Specific Plan Area, shall be constructed and tested for water quality under permit from the Monterey County Health Department. The project applicant shall provide the City of Salinas with a copy of the permit and a report or other information documenting the appropriate construction and operation of these facilities.

Mitigation Measure 3.5-4: The property line of all school sites (even if it is a joint use agreement as described in subsection (o) of § 14010) shall be at least the following distance from the edge of respective power line easements as identified in the California Code of Regulations Title 5, Article 2. School Sites § 14010, Standards for School Site Selection (c):

- 100 feet for power lines that are between 50 and 133 kV.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
10. HYDROLOGY AND WATER QUALITY. *Would the project:*					
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒	☐
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒	☐
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces in a manner	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
which would:					
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☐	☒	☐
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒	☐
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plans?	☐	☐	☐	☒	☐
(f) With regards to NPDES compliance:	☐	☐	☐	☒	☐
(i) Potential impact of project construction	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
on storm water runoff?					
(ii) Potential impact of project post-construction activity on storm water runoff?	☐	☐	☐	☒	☐
(iii) Potential for discharge of storm water from material storage areas, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas?	☐	☐	☐	☒	☐
(iv) Potential for discharge of storm water to impair the beneficial uses of the receiving waters or areas that provide water quality benefit?	☐	☐	☐	☒	☐
(v) Potential for the discharge of storm water to cause significant harm on the biological integrity of the waterways and water bodies?	☐	☐	☐	☒	☐
(vi) Potential for	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
significant changes in the flow velocity or volume of storm water runoff that can cause environmental harm?					
(vii) Potential for significant increases in erosion of the project site or surrounding areas?	☐	☐	☐	☒	☐
(viii) Could this proposed project result in an increase in pollutant discharges to receiving waters? Consider water quality parameters such as temperature, dissolved oxygen, turbidity, and other typical Stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash).	☐	☐	☐	☒	☐
(ix) Could the proposed project result in a decrease in treatment and retention capacity for the site's Stormwater run-on?	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
(x) Could the proposed project result in significant alteration of receiving water quality during or following construction?	☐	☐	☐	☒	☐
(xi) Could the proposed project result in increased impervious surfaces and associated increased urban runoff?	☐	☐	☐	☒	☐
(xii) Could the proposed project create a significant adverse environmental impact to drainage patterns due to changes in urban runoff flow rates and/or volumes?	☐	☐	☐	☒	☐
(xiii) Could the proposed project result in increased erosion downstream?	☐	☐	☐	☒	☐
(xiv) Could the proposed project alter the natural ranges of sediment supply and transport to receiving waters?	☐	☐	☐	☒	☐
(xv) Is the project tributary to an already impaired water body, as listed on the CWA Section 303(d) list? If so, can it result in an increase	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
in any pollutant for which the water body is already impaired?					
(xvi) Could the proposed project have a potentially significant environmental impact on surface water quality, to either marine, fresh, or wetland waters?	☐	☐	☐	☒	☐
(xvii) Could the proposed project result in decreased baseflow quantities to receiving surface waterbodies?	☐	☐	☐	☒	☐
(xviii) Could the proposed project cause of contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	☐	☐	☐	☒	☐
(xix) Does the proposed project adversely impact the hydrologic or water quality function of the 100-year floodplain area?	☐	☐	☐	☒	☐
(xx) Does the proposed project site layout adhere to the Permittee's waterbody setback	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
requirements? (xxi) Can the proposed project impact aquatic, wetland, or riparian habitat?	☐	☐	☐	☒	☐

Discussion

Overall conclusion: The CASP EIR provides project-level detail with respect to the proposed tentative subdivision map's effects relating to hydrology and water quality, in part due to the comprehensive character of the mitigation measures required to reduce such effects. The tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the impacts of the proposed tentative subdivision map relating to hydrology and water quality.

Responses a-f): Flood hazards can result from intense rain, snowmelt, cloudbursts, or a combination of all three, or from failure of a water impoundment structure, such as a dam. Floods from rainstorms generally occur in this climate zone between November and April and are characterized by high peak flows of moderate duration. Human activities have an effect on water quality when chemicals, heavy metals, hydrocarbons (auto emissions and car crank case oil), and other materials are transported with storm water into drainage systems. Construction activities can increase sediment runoff, including concrete waste and other pollutants.

In accordance with the NPDES Stormwater Program, Mitigation Measure 3.6-1 ensures compliance with existing regulatory requirements to prepare a SWPPP designed to control erosion and the loss of topsoil to the extent practicable using BMPs that the RWQCB has deemed effective in controlling erosion, sedimentation, runoff during construction activities. The RWQCB has stated that these erosion control measures are only examples of what should be considered and should not preclude new or innovative approaches currently available or being developed. The specific controls are subject to the review and approval by the RWQCB and are an existing regulatory requirement.

CONCLUSION

The proposed project has the potential to violate water quality standards or waste discharge requirements during construction. Mitigation Measure 3.6-1 requires the use of BMPs during construction activities in order to reduce erosion, control sediment, and manage runoff from the Specific Plan Area. The BMPs may include: covering disturbed areas with mulch, temporary seeding, soil stabilizers, binders, fiber rolls or blankets, temporary vegetation, and permanent seeding. The use of these measures would prevent polluted, non-treated runoff from entering the nearby storm drains and waterways. The various RWQCBs have evaluated the effectiveness of the types of BMPs required by Mitigation Measure 3.6-1 and have determined that BMPs are known to be effective in protecting receiving waters. Mitigation Measure 3.6-2 requires submittal of Improvement Plans which contain requirements that meet the City's NPDES permit requirements and the City's Stormwater Development Standards for New and Redevelopment Projects. Also, current agricultural operations in the Specific Plan Area (baseline conditions) lead to some levels of erosion and downstream turbidity, as well as other pollution entering the drainage system. The proposed project would result in the elimination of the agricultural runoff, which would be replaced with the development of a controlled storm drainage system implementing the latest BMPs. With implementation of Mitigation Measures 3.6-1 and 3.6-2, the proposed project would have a **less than significant** impact relative to this topic.

The proposed stormwater drainage system will need to meet a number of requirements from the City of Salinas, the County of Monterey, and the State of California. These include LID requirements, water quality treatment requirements, and hydromodification mitigation requirements. In addition to fulfilling these requirements, the Central Area Specific Plan is required to utilize site and parcel based post-construction BMPs to the maximum extent practicable, to:

- maximize stormwater infiltration and groundwater recharge;
- filter any stormwater runoff to meet water quality requirements;
- reduce the cost of "grey" infrastructure in favor of "green" infrastructure; and
- mitigate the post-project peak storm water runoff rates and storm water runoff volumes with the intent of avoiding negative impacts to any downstream facility.

The basin designs would incorporate features that provide stormwater quality benefits, while still meeting flood control needs. As part of the prevailing National Pollutant Discharge Elimination System (NPDES) requirements, the Permittee would be required to review existing numeric sizing criteria for structural treatment BMPs and to ensure that volume-based BMPs are designed to mitigate for potential pollutants, either through infiltration or treatment.

There are no plans to discharge stormwaters into the existing City of Salinas storm drain system. Storm drains within the Specific Plan Area will convey stormwaters to detention/retention/water quality basins in the creek corridors and eventually into Gabilan Creek and Natividad Creek. Waters that do not infiltrate or evaporate will be released following discharge requirements, and conveyed downstream into Carr Lake and the Reclamation Ditch system. Listed impairments of these receiving waters include: nitrate, ammonia, fecal coliforms, E. Coli, turbidity, priority organics, pesticides, copper, and low pH. If runoff from the Specific Plan Area is not treated, then increases in the listed water quality impairments for these receiving waters would be likely.

The NPDES permit granted to the City of Salinas by the Central Coast RWQCB (RWQCB – Central Coast Region, 2019) prohibits discharges which contribute to exceedances of water quality standards and requires that source control BMPs are implemented to minimize discharge of pollutants. The permit defines one Total Maximum Daily Load limitation for these receiving waters: fecal coliform concentrations must not exceed 200 MPN/100 Ml. Untreated stormwater discharges have the potential to contribute fecal coliforms to receiving waters, due to the presence animal wastes in impervious and landscaped areas.

The City of Salinas Stormwater Development Standards for New and Redevelopment Projects (City of Salinas, 2013) require the following water quality practices:

I. Pollution source control for all impervious areas using BMPs; and

II. Retention of all rainfall events up to the 95th percentile 24-hour rainfall event.

Stormwater discharges from the Specific Plan Area, if not treated, would violate the City of Salinas NPDES permit as well as the City of Salinas stormwater development standards, and would likely contribute to violations of the receiving water TMDL for fecal coliforms. Water quality treatment will be provided through the combination of both LID (source control) and BMP (treatment control) methods and facilities. The proposed project has incorporated space for bioswales along many of the proposed roads. Local surface runoff will either sheet flow to or be collected and conveyed through the bio-swales. In addition to the LID features, runoff from the Specific Plan Area will be treated by the neighborhood detention, water quality, and retention basins as well as water quality basins located within the parks throughout the Specific Plan Area. The neighborhood water quality basins are treatment control BMPs designed to collect overflow from adjacent overland surface flow and concentrated pipe discharge, treat runoff by attenuating flows to allow settlement of sediments, and then overflow back to the downstream storm drain system.

CONCLUSION

Like the overall CASP itself, the proposed tentative subdivision map has the potential to violate water quality standards or waste discharge requirements during operation. Mitigation Measure 3.6-3 requires submittal of a Stormwater Control Plan that includes calculations, BMPs and plan of sufficient detail to confirm that contaminant loadings to receiving waters will be reduced to the maximum extent practicable. Mitigation Measures 3.6-4 and 3.6-5 require submittal of detailed plans and calculations for the water quality BMPs, water quality detention basins, and supplemental retention and peak flow control. The BMPs will be designed to meet regulatory requirements and to reduce peak flows during storm events below peak flows under pre-project conditions. The various RWQCBs have evaluated the effectiveness of the types of BMPs required by Mitigation Measures 3.6-2 through 3.6-4 and have determined that BMPs are known to be effective in protecting receiving waters. With implementation of Mitigation Measures 3.6-3 through 3.6-5, the proposed project would have a **less than significant** impact relative to this topic.

The quantity of ground water in the Salinas Valley has been declining for decades, as evidenced by the substantial lowering of water levels in the aquifers. Impacts on groundwater in the Salinas area are an important consideration in any development plan. See Impact 3.11-6 in Chapter 3.11: Utilities in the Final EIR, for further discussions regarding groundwater demand, groundwater supplies, groundwater recharge, and saltwater intrusion. Impacts related to groundwater supplies and interference with groundwater recharge are considered in two ways: (1) conversion of pervious surfaces (which allow for groundwater recharge), and (2) use of groundwater as a water supply (which reduces the amount of local groundwater supply). Additionally, Monterey County is located in the Salinas Valley Groundwater Basin. The potential for the project to impede sustainable groundwater management of the Salinas Valley Groundwater Basin is also discussed below.

The proposed project would result in new impervious surfaces and could reduce rainwater infiltration and groundwater recharge in those areas. Infiltration rates vary depending on the overlying soil types. In general, sandy soils have higher infiltration rates and can contribute to significant amounts of ground water recharge; clay soils tend to have lower percolation potential; and impervious surfaces such as pavement significantly reduce infiltration capacity and increase surface water runoff.

The proposed development, including water quality BMPs, detention basins, and retention basins, is designed to minimize or eliminate increases in runoff from these new impervious surfaces entering surface water courses and storm drains. The stormwater runoff calculations completed as part of the Hydrology and Water Quality Technical Study (see **Appendix F of the Final EIR**) indicate that peak runoff and total volume of runoff will be minimized by the proposed development storm drainage design which retains water to the maximum extent possible. Consequently, infiltration into the

ground water aquifers will be maximized to the extent possible through the storm drainage design.

The proposed project will modify the movement of water across the land surface and the infiltration of rainwater into the groundwater system. The aquifers underlying the Specific Plan Area are impacted by nitrate contamination. Groundwater in the project vicinity is subject to increasing salinity due to seawater intrusion from Monterey Bay. This impairment affects use of the groundwater for potable water supplies and use for irrigation. The project, if no means were provided to preserve infiltration of rainwater, would likely reduce net infiltration of rainwater and runoff into the groundwater system and reduce the diluting effect of this fresh water supply. The net impact would be a further increase in sea water intrusion and build-up of contaminants in the groundwater in the Salinas basin. However, the proposed project without mitigation would also likely decrease the amounts of nitrates entering the groundwater from the Specific Plan Area, due to elimination of agricultural activity including fertilizer application. Surface water quality detention basins and BMPs also have the potential to add to groundwater contamination levels if they are not properly designed and sited.

The BMPs proposed as part of the development plan are designed to infiltrate as much storm water runoff as practicable into the ground. The predicted impact of the development, including retention basins and BMPs, is to decrease the volume of runoff from the Specific Plan Area during large rainfall events and eliminate discharges completely for storms up to the 95th percentile 24-hourrain event. A portion of the retained runoff (and likely the vast majority given the sandy soils) will infiltrate into the ground, helping to replenish the aquifers. The proposed BMPs are designed to trap contaminants and to beneficially make use of nutrients in the vegetated swales and planted areas. In addition, application rates of fertilizers on urbanized areas is less than that typically used in intensive agriculture. The aggregate effect of the proposed development will, therefore, be to decrease the loading of nutrients (in particular, nitrates) into the groundwater. The CASP would provide three new wells to be constructed as development progresses. The first well would be operational approximately at the time of or before the first certificate of occupancy is issued.

As noted previously, an estimated 80% of the land in the Specific Plan Area or 608 acres is presently used to grow irrigated crops – lettuce and various vegetables (strawberries, broccoli, cauliflower, and alfalfa). Estimated groundwater pumping for existing irrigated agricultural use in the Specific Plan Area is 3,648 AFY.

The estimated 3,648 AFY ground water pumping for existing agricultural use in the Central Area Specific Plan is 813 AFY more than the maximum total buildout estimated water demand for the Central Area Specific Plan, which is 2,835 AFY. Therefore, the total buildout estimated water demand for the Central Area Specific Plan is projected to use less water than required for current irrigated agricultural uses. In addition, the overall effect of the CASP to groundwater resources would be beneficial, as the CASP

would reduce groundwater pumping compared to the existing conditions. The same is true of the proposed tentative subdivision map.

As discussed previously, the Monterey County Groundwater Management Plan was prepared in May 2006. The purpose of the Plan is "to provide a comprehensive overview of the Salinas Valley Groundwater Basin and to recommend various management strategies for the basin." According to the Groundwater Management Plan, the development and operation of the Nacimiento and San Antonio Reservoirs and the development of recycled water use for irrigation, represent water resource and water supply management actions, aimed at what can be considered to be the overall management objectives for the Salinas Valley Groundwater Basin. In no priority, those basin management objectives are:

1. Development of Integrated Water Supplies to Meet Existing and Project Water Requirements.

2. Determination of Sustainable Yield and Avoidance of Overdraft.

3. Preservation of Groundwater Quality for Beneficial Use.

While these objectives are regional in nature, the CASP and implementing tentative subdivision maps would not conflict with these three basin management objectives. For example, the CASP and the proposed project would reduce groundwater pumping compared to existing conditions and, as such, would avoid overdraft of the groundwater basin. Additionally, with respect to the preservation of groundwater quality for beneficial use, the Groundwater Management Plan notes that this objective focuses on the impacts of intrusion of saltwater into coastal aquifers. As noted above, the aquifers underlying the Specific Plan Area are impacted by nitrate contamination. The aggregate effect of the proposed development will be to decrease the loading of nutrients (in particular, nitrates) into the groundwater. As described in detail in Section 3.11, Utilities of the Final EIR, the Cal Water Salinas District has sufficient groundwater supplies to provide for all of its service area customers, including residents and businesses within the CASP, for years to come. Overall, the project would not interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

As discussed previously, the groundwater sustainability plan was approved by the SVBGSA Board of Directors on January 9, 2020 (entitled Salinas Valley Groundwater Basin 180/400-Foot Aquifer Subbasin Groundwater Sustainability Plan). The GSP identifies projects and actions that provide stakeholders with options to reach sustainability of the underlying aquifer, including with regard to seawater intrusion. This approach provides individual landowners and public entities flexibility in how they manage water and how the Subbasin achieves groundwater sustainability. All groundwater pumpers will be allowed to make individual decisions on how much

groundwater they pump based on their perceived best interests. The set of projects and actions achieve the following objectives:

- Achieving groundwater sustainability by meeting Subbasin-specific SMC by 2040
- Creating equity between who benefits from projects and who pays for projects
- Establishing a source of funding for project implementation
- Providing incentives to constrain groundwater pumping within limits

The projects and actions included in the GSP are defined as a toolbox of options. The GSP demonstrates that sufficient options exist to reach sustainability. The projects and actions in the GSP include a water charges framework, management actions, specific projects prioritized for integrated management of the Salinas Valley, mitigation of overdraft, and other groundwater management activities. Specific details need to be developed for stakeholders to determine which projects and actions to implement. The projects and management actions described in this GSP constitute an integrated management program for the entire Salinas Valley Groundwater Basin.

The specific projects identified include:

- Project Type 1: In-lieu recharge through direct delivery of water to replace groundwater pumping;
- Project Type 2: Direct recharge through recharge basins or wells (also commonly referred to as Managed Aquifer Recharge);
- Project Type 3: Indirect recharge through decreased evapotranspiration or increased infiltration; and
- Project Type 4: Hydraulic barrier to control seawater intrusion.

This GSP lays out a roadmap for addressing all of the activities needed for GSP implementation between 2020 and 2040, focusing mainly on the activities between 2020 and 2025. The CASP and individual tentative subdivision maps for land within the CASP would replace agricultural water uses with urban water uses. The net change in water demand derived from this conversion is the difference between the existing agricultural baseline demand and water demand from development within the Plan Area. The groundwater basin is currently in overdraft. If the proposed project results in increased water demand that must be met by expanded groundwater pumping within the Pressure Subarea and/or the East Side Subarea, the proposed project would likely exacerbate overdraft and seawater intrusion conditions. In such a case, the sufficiency of water

supply entitlements from Cal Water and/or ALCO could be in question given the impact. The following analysis provides an approximation of the net change in water demand.

An estimated 80% of the land in the Specific Plan Area or 608 acres is presently used to grow irrigated crops, such as lettuce and various vegetables. Estimated groundwater pumping for existing irrigated agricultural use in the Specific Plan Area is 3,648 AFY.

The estimated 3,648 AFY groundwater pumping for existing agricultural use in the Central Area Specific Plan is 835 AFY more than the maximum total buildout estimated water demand for the Central Area Specific Plan, which is 2,835 AFY.7 Therefore, the total buildout estimated water demand for the Central Area Specific Plan is projected to use less water than required for current irrigated agricultural uses.

CONCLUSION

The proposed project, without mitigating features, would reduce infiltration of rainwater and runoff into the local groundwater system due to the increase in impermeable area. This may deplete groundwater supplies or interfere substantially with groundwater recharge. The total annual rainfall depth in an average year is approximately 16 inches and the project surface area is approximately 760 acres, producing an annual rainfall volume of approximately 1,013 AF. Nearly all of this area is currently in agriculture, while the CASP could convert as much as 60 percent of the area to impervious surfaces, resulting in a reduction in groundwater recharge in the range of 400 to 600 AF. However, the proposed stormwater BMPs and retention basins are designed to reduce runoff below that which occurs currently during storm events and, therefore, increase groundwater recharge from the Specific Plan Area to the extent possible. Additionally, the overall effect of the CASP and development therein on groundwater pumping would be beneficial, as the proposed project would reduce groundwater pumping compared to existing conditions. Implementation of the following mitigation measures would ensure that impacts related to groundwater recharge and groundwater management would be **less than significant**.

The proposed development, including water quality BMPs, detention basins, and retention basins, is designed to minimize or eliminate increases in runoff entering existing surface water courses and storm drains. The calculations completed as part of the Hydrology and Water Quality Technical Study indicate that peak runoff and total volume of runoff will be minimized by the proposed development storm drainage design which retains water to the maximum extent possible.

The proposed project will not alter drainage patterns in a manner which will cause flooding, erosion, or siltation. Surface runoff from the area will be managed via parcel-based LID measures, detention/retention basins, and flow reducing BMPs to prevent local flooding within the site. These features will also reduce peak flows from the Specific Plan Area to receiving creeks and storm drains to amounts less than such flows under existing conditions. Sediment in the stormwater flows will be captured in detention

ponds designed to prevent siltation. Erosion or siltation are not anticipated by the proposed project given the storm drain design and best management practices that will be implemented.

The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation. With the implementation of Mitigation Measures 3.6-1 through 3.6-5 (see below), and with the design and construction of the improvements included in the proposed storm drainage system, the proposed project would have a **less than significant** impact relative to this topic.

Gabilan and Natividad Creeks are located in the Specific Plan Area. As part of the Specific Plan, areas along these two Creeks have been designated for open space uses. As noted previously, the City's storm drainage system conveys runoff to the following major receiving waters: Reclamation Ditch, Carr Lake, Gabilan Creek, Natividad Creek, Santa Rita Creek, Markley Swamp, and the Salinas River. Important water quality concerns for the Carr Lake, Santa Rita Creek, and Gabilan Creek receiving waters include: turbidity, nutrients, and fecal coliforms. Urbanized areas also produce contaminants such as heavy metals, oils and greases, pesticides, nutrients from landscape fertilizers, and household chemicals. The water quality BMPs and water quality detention basins which are included in the proposed development are designed to capture and retain the urban-associated contaminants as well as reduce turbidity and nutrients which may be mobilized in the developed areas. The water quality detention basins will also trap suspended solids and nutrients which enter the Specific Plan Area from the up-slope properties which will continue to be farmed or used for livestock grazing. The proposed development is anticipated to reduce loading of contaminants, nutrients, and turbidity to the receiving waters relative to existing conditions.

In accordance with the NPDES Stormwater Program, Mitigation Measure 3.6-1 above requires an approved SWPPP designed to control erosion and the loss of topsoil to the extent practicable using BMPs that the RWQCB has deemed effective in controlling erosion, sedimentation, runoff during construction activities. Such BMPs shall include: temporary erosion control measures such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover or other equally or more effective measures. The BMPs and overall SWPPP are submitted to the RWQCB and the City of Salinas as part of the permitting process. The SWPPP is kept on site and implemented during construction activities and must be made available upon request to representatives of the RWQCB and/or the City of Salinas. The RWQCB has stated that these erosion control measures are only examples of what should be considered and should not preclude equally or more effective new or innovative approaches currently available or being developed. The specific controls are subject to the review and approval by the RWQCB.

CONCLUSION

The proposed project would not substantially degrade water quality. The use of BMPs is intended to treat runoff close to the source during the construction and long-term operational phase of the project to reduce stormwater quality impacts. The mitigation measure listed below complies with existing regulatory requirements. Implementation of proposed project would have a **less than significant** impact relative to this topic.

As shown on Figure 3.6-3 in the Final EIR, delineated flood zones include areas adjacent to both creek channels; these are depicted in an aqua/green color along all corridors. Gabilan Creek has been mapped and contains Regulatory Floodway and Special Flood Hazard Areas, Zone AE. Base Flood Elevations can be determined based the creek's Flood Insurance Study.8 The areas along Natividad Creek are within the one percent annual chance flood hazard area (100-year flood zone) Zone A. Zone A includes areas subject to inundation by the one-percent-annual-chance flood event generally determined using appropriate methodologies. Because detailed hydraulic analyses have not been performed, no BFEs or flood depths are shown. Mandatory flood insurance purchase requirements and floodplain management standards apply. Additionally, portions of the western Specific Plan Area are within the 0.2 percent annual chance flood hazard area (500-year flood zone, Zone X). Flood conditions in Zone X ("Other Flooded Areas") are limited to less than one-foot depth or less than one acre during the one-percent annual chance flood and/or are areas of 0.2-percent annual chance flood. The extent of flooding is naturally limited by existing topography. As noted previously, Natividad Creek traverses the eastern portion of the Specific Plan Area from north to south, and Gabilan Creek traverses the western portion of the Specific Plan Area from north to south. The Central Area Specific Plan notes that the areas currently identified as flood hazard Zone AE on Gabilan Creek and Zone A on Natividad Creek would be restored to a more natural creek corridor, with detention/retention/water quality basins to be installed and operated along the lateral boundaries of the corridor. Grading plans identify substantial in-fill in the flood hazard area shaded Zone X to prepare for mixed use development plans that will include housing. If grading is not properly carried out and housing were to be placed within these boundaries, those housing units could be subject to flooding.

Additionally, a series of detention/retention/water quality basins are proposed to be built along the lateral edges of restored creek corridors and may take up 50 to 66 percent of the proposed corridor space within existing Zones AE and A. Existing corridor sediments in flood Zones AE and A are primarily sandy materials with high infiltration capacities. The basins would function as stormwater and low flow receiving basins for all flows generated by the project area. Some basins could be overtopped and inundated during certain high flow runoff conditions by flows from upstream locations. If not properly designed, implemented, and maintained, a naturalized creek corridor that is largely bounded by detention/retention/water quality basins could result in flood flow impedance or redirection.

Sediment transport of fine-grained materials from upstream and local sources could clog infiltration capacities and could fill required storage space within the stormwater basins. The non-cohesive nature of corridor sediments could result in embankment side slope failures of the detention/retention/water quality basins that are proposed to be located along the lateral extents of each creek.

CONCLUSION

As noted previously, the proposed development, including water quality BMPs, detention basins, and retention basins, is designed to minimize or eliminate increases in runoff entering existing surface water courses and storm drains. The calculations completed as part of the Hydrology and Water Quality Technical Study indicate that peak runoff and total volume of runoff will be minimized by the proposed development storm drainage design, which retains water to the maximum extent possible. The proposed project will not alter drainage patterns in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, or impede or redirect flood flows.

Mitigation Measures 3.6-8 through 3.6-15 require a letter of map revision (LOMR-F), detailed grading plans and calculations which show how the project would raise the land surface elevation above the base flood elevation, design basis reports for creek corridor restoration, calculations to address sediment transport issues, calculations to address basin embankment side slope failure, procedures that address basin issues associated with sedimentation, and procedures that address basin issues associated with embankment side slope failures. With implementation of the following mitigation measures, the proposed project would have a **less-than-significant** impact relative to this topic.

The calculations to address these sediment transport issues may include:

- A streamflow and sediment transport (bedload and suspended sediment) data collection monitoring program that begins one- to two-years pre-construction and continues through a mandated post-project timeframe and would provide volumetric information for calculations related to the potential for sediment deposition.

- Pre-project measurements could be used to estimate sediment loading, which could inform the design of mitigation measures and enable estimates of maintenance frequencies needed ensure ongoing efficacy of the measures. During project execution and after project completion, measurements of bedload and suspended sediment in the channel at the downstream boundary of the project could be used to verify performance of sediment management measures and avoidance of associated sediment transport impacts.

- The United States Geological Survey gage record on Gabilan Creek (#11152600) contains limited suspended sediment data that was collected in March and April of 2017. These data could be used to compare to and/or validate measurements obtained via field data collection.

Strategies and measures to address these sediment transport issues may include:

- Bioretention Basins: Bioretention basin features provide multiple water quality functions for stormwater systems, including performing as depositional areas for sediments that settle and get trapped in the bioretention media.

  An operations and maintenance plan shall be used to address specific maintenance requirements related to sediment accumulation, such that basin media remediation would take place when a threshold condition (such as a certain amount of sediment accumulation on the basin floor) is reached. For instance, if sediment deposition exceeds a depth of 2-inches, even a small patch, the sediment would require removal to keep the basin functioning properly.

  Furthermore, the functional lifespan of bioretention media (mulch, soils, drain rock, underdrain) is generally about 15 years. Annual monitoring reports could be used to track basin performance under varying wet season conditions and used to guide media replacement timing.

- Treatment Wetlands: Treatment wetlands are designed to mimic the natural infiltration, nutrient cycling, habitat, and a myriad of other important ecological functions provided by natural wetlands. Treatment wetlands could be constructed at storm drain outfall locations or adjacent to or off-channel from a creek channel. Wetlands could vary between those that are highly designed and may need relatively high levels of maintenance to more naturally based designs that may need more limited maintenance, each with varying levels of treatment potential.

  Treatment performance is a function of wetland to watershed ratio, wetland treatment design, area hydrology, hydraulic residence time, and source pollutants. The preferred residence time through wetlands varies based on vegetation type and quantity, water depth, temperature, and design flow rates. Having a lower design flow rate can result in longer hydraulic residence time, which is preferred particularly at the start of a rainy season, since the "first flush" volume of stormwater runoff will generally contain the highest concentrations of pollutants. Treatment wetland design generally considers dry season irrigation return flows and first flush principles.

- Vegetated Banks/Riparian Corridor: Trees and other riparian corridor vegetation

appropriate to the environment, such as willows, could grow rapidly on channel banks and trap sediments, removing sediment from stream flows as well as from local surface runoff.

- Floodplains: Floodplains provide one of the most important storage spaces for sediment as it moves discontinuously through a watershed. Naturally functioning floodplains generally extend laterally past the immediate riparian buffer zone into relatively flat areas. Floodplain access could be provided by bank and channel grading at specified design storm flows. The rate of sediment deposition on floodplains is largely dependent on the frequency of inundating flows, the suspended sediment loads in the river, available floodplain area, and presence of vegetation.

As noted in Impacts 3.6-4 and 3.6-6, the proposed development, including water quality BMPs, detention basins, and retention basins, is designed to minimize or eliminate increases in runoff entering existing surface water courses and storm drains. The calculations completed as part of the Hydrology and Water Quality Technical Study indicate that peak flow runoff and total volume of runoff will be mitigated by the proposed development storm drainage design which retains water to the maximum extent possible. The proposed project will not alter drainage patterns in a manner which will substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Surface runoff from the area will be managed via parcel-based LID measures, detention/retention basins, and flow reducing BMPs to prevent local flooding within the site. These features will also reduce peak flows from the Specific Plan Area to receiving creeks and storm drains to amounts less than such flows under existing conditions. Sediment in the stormwater flows will be captured in detention ponds designed to prevent siltation. Exceedance of the stormwater drainage capacity is not anticipated by the proposed project given the storm drain design and best management practices that will be implemented.

The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows. With the implementation of Mitigation Measures 3.6-1 through 3.6-5 already presented above, and with the design and construction of the improvements included in the proposed storm drainage system, this impact is considered **less than significant**.

The Specific Plan Area is approximately 9 miles from the coast, which is sufficiently distant to preclude effects from a tsunami. Additionally, tsunami inundation maps for the area show no risk of tsunami inundation for the Specific Plan Area. Seiches are changes or oscillations of water levels within a confined water body. Seiches are

caused by fluctuation in the atmosphere, tidal currents or earthquakes. The effect of this phenomenon is a standing wave that would occur when influenced by the external causes. The Specific Plan Area is not adjacent to any lakes that pose significant a risk from a seiche event.

As shown in Figure 3.6-4 of the Final EIR, the elevation of the Specific Plan Area and its distance from the Salinas River channel make it extremely unlikely that failure of either dam or failure of any of the levees located along the Salinas River channel would cause flooding of the Specific Plan Area. No other levees or dams exist in the vicinity of the Specific Plan Area. The site is also elevated sufficiently above sea level to preclude any risk of inundation due to sea level rise.

CONCLUSION

The project is not located in an area that is subject to tsunamis, seiches, or significant flooding (with mitigation measures outlined in Impact 3.6-6. Mitigation Measures 3.6-7 through 3.6-14 of the Final EIR) require a LOMR-F, detailed grading plans and calculations which show how the project would raise the land surface elevation above the base flood elevation, design basis reports for creek corridor restoration, calculations to address sediment transport issues, calculations to address basin embankment side slope failure, procedures that address basin issues associated with sedimentation, and procedures that address basin issues associated with embankment side slope failures. As such, the proposed project would not result in the release of pollutants due to project inundation as a result of flooding, tsunami, or seiche zones. This impact is considered **less than significant**.

The cumulative context for a cumulative analysis can be defined by region, by political subdivision or by the geography. The cumulative context for the analysis of cumulative stormwater runoff impacts is best addressed on a regional/watershed basis (geography). Because water resources are highly interconnected, the cumulative setting is based on Monterey County, which is located in the Central Coast Hydrological Region. With respect to surface waters, runoff from the Specific Plan Area currently flows toward Gabilan Creek or Natividad Creek according to general overland flow pathways. Gabilan Creek flows into the Carr Lake basin, while Santa Rita Creek flows westward and enters the Reclamation Ditch near Castroville. Runoff downstream of the Specific Plan Area is conveyed through the ditch system either as flows in the creeks or into the City of Salinas storm drain system as defined in the City of Salinas Stormwater Master Plan.

The City's storm drainage system conveys runoff to the following major receiving waters: Reclamation Ditch, Carr Lake, Gabilan Creek, Natividad Creek, Santa Rita Creek, Markley Swamp, and the Salinas River. The peak runoff resulting from the proposed project, in addition to all past, present, and probable future projects in Monterey County, would ultimately be conveyed to these waterbodies.

The Reclamation Ditch is a major drainage channel that flows from east to west through the City. Most of the City drains to the Reclamation Ditch, which was constructed in 1917 following formation of Reclamation District No. 1665. Carr Lake is a dry lakebed on the Reclamation Ditch that now functions as detention storage for the ditch during winter rainy periods. Natividad Creek and Gabilan Creek originate north of the City, then flow south through the City and drain to the Carr Lake area. At Carr Lake, both Gabilan and Natividad Creeks are tributary to the Reclamation Ditch. During major storms with high backwater in the Reclamation Ditch, these creeks overflow at their downstream end and inundate areas of Carr Lake.

Implementation of the Central Area Specific Plan would increase the amount of impervious surfaces in the Specific Plan Area, which could increase peak stormwater runoff rates and volumes on and downstream of the Specific Plan Area. The Central Area Specific Plan includes an extensive system of on-site stormwater collection, treatment and retention facilities to accommodate the increased stormwater flows that would originate in the Specific Plan Area.

Surface runoff from the area will be managed via parcel-based LID measures, detention/retention basins, and flow reducing BMPs to prevent local flooding within the site. These features will also reduce peak flows from the Specific Plan Area to receiving creeks and storm drains to amounts less than such flows under existing conditions.

The proposed development, including water quality BMPs, detention basins, and retention basins, is designed to minimize or eliminate increases in runoff from these new impervious surfaces entering surface water courses and storm drains. The stormwater runoff calculations completed as part of the Hydrology and Water Quality Technical Study indicate that peak runoff and total volume of runoff will be minimized by the proposed development storm drainage design which retains water to the maximum extent possible.

CONCLUSION

With the design and construction of flood control improvements, and with implementation of the mitigation measures included in this section, the Central Area Specific Plan and its implementing tentative subdivision maps would not increase peak stormwater runoff. The proposed project, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Monterey County), would not be expected to cause any significant cumulative impacts given that mitigation measures would control peak stormwater runoff.

The proposed project would not have cumulatively considerable impacts associated with stormwater runoff. Overall, implementation of the proposed project would have a **less than significant** and **less than cumulatively considerable** contribution to stormwater runoff.

The cumulative context for a cumulative analysis can be defined by region, by political subdivision or by the geography. The cumulative context for the analysis of cumulative water quality impacts is best addressed on a regional/watershed basis (geography). Because water resources are highly interconnected, the cumulative setting is based on Monterey County, which is located in the Central Coast Hydrological Region. With respect to surface waters, runoff from the Specific Plan Area currently flows toward Gabilan Creek or Natividad Creek according to general overland flow pathways. Gabilan Creek flows into the Carr Lake basin, while Santa Rita Creek flows westward and enters the Reclamation Ditch near Castroville. Runoff downstream of the Specific Plan Area is conveyed through the ditch system either as flows in the creeks or into the City of Salinas storm drain system as defined in the City of Salinas Stormwater Master Plan.

There are no plans to discharge stormwaters into the existing City of Salinas storm drain system. Storm drains within the Specific Plan Area will convey stormwaters to detention/retention/water quality basins in the creek corridors and eventually into Gabilan Creek and Natividad Creek. Waters that do not infiltrate or evaporate will be released following discharge requirements and conveyed downstream into Carr Lake and the Reclamation Ditch system.

The storm water conveyance system would include an integrated network of open waterways and drains, underground storm drainpipes, detention/retention/water quality basins, and a wide range of LID and BMP features. Storm drain pipelines will total roughly 25,000 feet in length. Combination\ detention/retention/water quality basins are planned along both sides and much of the length of the Gabilan and Natividad Creek corridors within the Specific Plan Area.

Development of the Central Area Specific Plan could contribute to a cumulative increase in urban pollutant loading, which could adversely affect water quality. Cumulative development in the Salinas area, including within the Specific Plan Area, would also result in increased impervious surfaces that could increase the rate and amount of runoff, thereby potentially adversely affecting existing surface water quality through increased erosion and sedimentation. The primary sources of water pollution include: runoff from roadways and parking lots; runoff from landscaping areas; non stormwater connections to the drainage system; accidental spills; and illegal dumping. Runoff from roadway and parking lots could contain oil, grease, and heavy metals; additionally, runoff from landscaped areas could contain elevated concentrations of nutrients, fertilizers, and pesticides. The Central Area Specific Plan is required to comply with Mitigation Measure 3.6-1, which requires that the SWPPP must include BMPs to regulate stormwater quality for the Specific Plan Area. In accordance with the National Pollution Discharge Elimination System (NPDES) Stormwater Program, Mitigation Measure 3.6-1 ensures compliance with existing regulatory requirements to prepare a SWPPP designed to control erosion and the loss of topsoil to the extent practicable using BMPs that the Regional Water Quality Control Board (RWQCB), Central Coast Region, has deemed effective in controlling erosion, sedimentation, runoff during construction activities. The RWQCB has stated that these erosion control

measures are only examples of what should be considered and should not preclude the use of equally or more effective new or innovative approaches currently available or being developed. The specific controls are subject to the review and approval by the RWQCB and the City of Salinas and are an existing regulatory requirement.

While there are no assurances that other projects in the County would incorporate the same degree or methods of treatment as the Central Area Specific Plan, several of the projects within the City of Salinas would phase out existing agricultural runoff discharges from their respective sites and, similar to the Central Area Specific Plan, could provide some level of water quality improvement. Also, each project in the City that would discharge stormwater runoff would be required to comply with NPDES discharge permits from the RWQCB, which adjusts requirements on a case-by-case basis to avoid significant degradation of water quality. Therefore, while a greater quantity of urban runoff may result from implementation of other future projects, because of an increase in impervious surfaces, the associated surface water quality impacts would be expected to be less than significant because of improved or similar quality of runoff compared to existing conditions.

CONCLUSION

Compliance with City and County water quality protection regulations, approval from the RWQCB, and implementation of Mitigation Measure 3.6-1 would ensure that the Central Area Specific Plan minimizes impacts to surface water quality. The proposed project, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Monterey County), would not be expected to cause any significant cumulative impacts given that mitigation measures would control storm water quality. The proposed project would not have cumulatively considerable impacts associated with water quality. Overall, implementation of the proposed project would have a **less than significant** and **less than cumulatively considerable** contribution to the potential for degradation of water quality.

The cumulative context for a cumulative analysis can be defined by region, by political subdivision or by the geography. Because water resources are highly interconnected, the cumulative setting is the Salinas Valley Groundwater Basin Area. The Salinas Valley is the largest coastal groundwater basin in Central California, and is drained by the Salinas River. Salinas Valley extends approximately 150 miles from the headwaters to the mouth of the River at Monterey Bay, draining approximately 5,000 square miles. The Specific Plan Area is located in the Natividad Creek-Gabilan Creek watershed.

The Central Area Specific Plan would result in new impervious surfaces and could reduce rainwater infiltration and groundwater recharge in those areas. Infiltration rates vary depending on the overlying soil types. In general, sandy soils have higher infiltration rates and can contribute to significant amounts of ground water recharge; clay soils tend to have lower percolation potential; and impervious surfaces such as pavement significantly reduce infiltration capacity and increase surface water runoff.

The proposed development, including water quality BMPs, detention basins, and retention basins, is designed to minimize or eliminate increases in runoff from these new impervious surfaces entering surface water courses and storm drains. The stormwater runoff calculations completed as part of the Hydrology and Water Quality Technical Study indicate that peak runoff and total volume of runoff will be minimized by the proposed development storm drainage design which retains water to the maximum extent possible. Consequently, infiltration into the ground water aquifers will be maximized to the extent possible through the storm drainage design.

The project will modify the movement of water across the land surface and the infiltration of rainwater into the groundwater system. The aquifers underlying the Specific Plan Area are impacted by nitrate contamination. Groundwater in the project vicinity is subject to increasing salinity due to seawater intrusion from Monterey Bay. Both of these impairments affect use of the groundwater for potable water supplies and use for irrigation. The proposed project, if no means were provided to preserve infiltration of rainwater, would likely reduce net infiltration of rainwater and runoff into the groundwater system and reduce the diluting effect of this fresh water supply. The net impact would be a further increase in salinity intrusion and build-up of contaminants in the groundwater in the Salinas basin. However, the proposed project without mitigation would also likely decrease the amounts of nitrates entering the groundwater from the Specific Plan Area, due to elimination of agricultural fertilizer application. Surface water quality detention basins and BMPs also have the potential to add to groundwater contamination levels if they are not properly designed and sited. Water quality concerns have been addressed through the Nitrate Management Program established by the MCWRA, as well as the public planning processes that have led to the Salinas Valley Water Project. The implementation of the Salinas Valley Water Project, the Well Relocation Project, the Urban Recycled Water Project, and the Salinas River Fish Habitat Monitoring Program complement efforts that are currently taking place in the Salinas River watershed in assisting DWR and SWRCB in meeting statewide priorities. All probable future projects (inclusive of buildout of the various General Plans within Monterey County) would be required to address water quality concerns during their environmental review process and would be subject to the requirements of these projects and programs, as applicable.

The proposed project, without mitigating features, would reduce infiltration of rainwater and runoff into the local groundwater system due to the increase in impermeable area. The total annual rainfall depth in an average year is approximately 16 inches and the project surface area is approximately 760 acres, producing an annual rainfall volume of approximately 1,013 AF. Nearly all of this area is currently in agriculture, while the proposed project could convert as much as 60 percent of the area to impervious surfaces, resulting in a reduction in groundwater recharge in the range of 400 to 600 AF. However, where new urban development occurs on land in active agricultural use, the potential exists for urban uses to reduce demand for groundwater relative to

agricultural uses, as urban uses often demand less water than is required for agricultural irrigation.

CONCLUSION

The proposed project, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Monterey County), would not be expected to cause any significant cumulative impacts given that mitigation measures require maintaining water quality standards and preserving the infiltration of rainwater within the aquifer. The proposed project would not have cumulatively considerable impacts associated with groundwater supply/recharge. However, because nitrate contamination is an ongoing problem for the overall Salinas Valley, cumulative impacts associated with groundwater supply and recharge associated with the proposed Specific Plan would be **significant**. Because the Specific Plan Area is designated as a future growth area by the City's General Plan, and the Plan Area is currently used for agricultural uses (which often demand more water than urban uses), implementation of the proposed project would have a **less than cumulatively considerable** contribution to the potential for degradation of groundwater supply or recharge.

The cumulative context for the analysis of cumulative flooding impacts is best addressed on a regional/watershed basis (geography). Because water resources are highly interconnected, the cumulative setting is based on Monterey County, which is located in the Central Coast Hydrological Region. With respect to surface waters, runoff from the Specific Plan Area currently flows toward Gabilan Creek or Natividad Creek according to general overland flow pathways. Runoff downstream of the Specific Plan Area is conveyed through the ditch system either as flows in the creeks or into the City of Salinas storm drain system as defined in the City of Salinas Stormwater Master Plan.

As shown on Figure 3.6-3 of the Final EIR, delineated flood zones include areas adjacent to both creek channels; these are depicted in an aqua/green color along all corridors. Gabilan Creek has been mapped and contains Regulatory Floodway and Special Flood Hazard Areas, Zone AE. Base Flood Elevations can be determined based the creek's Flood Insurance Study.9 The areas along Natividad Creek are within the one percent annual chance flood hazard area (100-year flood zone) Zone A. Zone A includes areas subject to inundation by the one-percent-annual-chance flood event generally determined using appropriate methodologies. Because detailed hydraulic analyses have not been performed, no BFEs or flood depths are shown. Mandatory flood insurance purchase requirements and floodplain management standards apply. Additionally, portions of the western Specific Plan Area are within the 0.2 percent annual chance flood hazard area (500-year flood zone, Zone X). Flood conditions in Zone X ("Other Flooded Areas") are limited to less than one-foot depth or less than one acre during the one-percent annual chance flood and/or are areas of 0.2-percent annual chance flood. The extent of flooding is naturally limited by existing topography. As noted previously, Natividad Creek traverses the eastern portion of the Specific Plan Area from north to south, and Gabilan Creek traverses the western portion of the Specific Plan

Area from north to south. The Central Area Specific Plan notes that the areas currently identified as flood hazard Zone AE on Gabilan Creek and Zone A on Natividad Creek would be restored to a more natural creek corridor, with detention/retention/water quality basins to be installed and operated along the lateral boundaries of the corridor. Grading plans identify substantial in-fill in the flood hazard area shaded Zone X to prepare for mixed use development plans that will include housing. If grading is not properly carried out and housing were to be placed within these boundaries, those housing units could be subject to flooding.

Future development projects in the area could result in additional discharges of stormwater during storm events. When combined, these future development projects could, in theory, lead to an incremental increase in peak stormwater runoff, and potential incremental increases in downstream flood elevations. However, in order to ensure that future development projects in the County do not increase downstream flood elevations, the Monterey County Water Resources Agency (MCWRA) oversees the development and implementation of water quality, water supply, and flood control projects in Monterey County, including operation and maintenance of the Reclamation Ditch. The Reclamation Ditch is part of a complex drainage system within the lower Salinas Valley which helps collect surface water stormwater flows to ensure stormwater during storm events does not increase downstream flood elevations.

Additionally, Article VI (Flood Damage Prevention) of the City's Municipal Code outlines the methods of reducing flood losses for subdivisions and other proposed developments via construction standards. The standards apply to all areas of special flood hazards within the jurisdiction of the City of Salinas, including the Specific Plan Area.

The Central Area Specific Plan includes an extensive system of on-site stormwater collection, treatment and retention facilities to accommodate the increased stormwater flows that would originate in the Specific Plan Area. Surface runoff from the area will be managed via detention/retention basins and flow reducing Best Management Practices (BMPs) to prevent local flooding within the Specific Plan Area. These features will also reduce peak flows from the Specific Plan Area to receiving creeks and storm drains to amounts less than such flows under existing conditions.

In addition to the BMPs, open space areas, which include LID features, will also be incorporated throughout the Specific Plan Area to reduce and eliminate the need for large, unattractive, industrial-looking detention/retention basins. Instead, supplemental storm water facilities, where provided or needed, will include varied slopes through grading and the use of plants and trees and other elements to create a natural appearance.

The proposed development, including water quality BMPs, supplemental detention basins, and retention basins, is designed to minimize or eliminate increases in runoff from these new impervious surfaces entering surface water courses and storm drains. The stormwater runoff calculations completed as part of the Hydrology and Water

Quality Technical Study indicate that peak runoff and total volume of runoff will be minimized by the proposed development storm drainage design which retains water to the maximum extent possible.

CONCLUSION

Future development in the area must be sited and designed in accordance with the aforementioned City flood damage regulations (i.e., Article VI, Flood Damage Prevention, of the City's Code). The proposed project, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Monterey County), would not be expected to cause any significant cumulative impacts, given that mitigation measures for new development projects require designs that ensure structures are outside the base flood elevation and that storm water flows are maintained to prevent downstream flooding. The proposed project would not have cumulatively considerable impacts associated with flooding. Overall, implementation of the proposed project would have a ***less than significant*** and ***less than cumulatively considerable*** contribution to the potential for impacts related to flooding.

Applicable Mitigation from Prior EIR (if any)

The following Mitigation Measures for Hydrology and Water Quality stated in the adopted Final Mitigation Monitoring and Reporting Program from the Final Environmental Impact Report for the Salinas Central Area Specific Plan dated November 2020 shall be required for any future development in the project area:

Mitigation Measure 3.6-1: Prior to issuance of grading permits, the project proponent shall submit a Notice of Intent (NOI) and Storm Water Pollution Prevention Plan (SWPPP) to the City of Salinas prior to submitting to the RWQCB to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009- DWQ amended by 2010-0014-DWQ & 2012-0006-DWQ). The SWPPP shall be designed with Best Management Practices (BMPs) that the RWQCB has deemed to be effective at reducing erosion, controlling sediment, and managing runoff. These include: covering disturbed areas with mulch, temporary seeding, soil stabilizers, binders, fiber rolls or blankets, temporary vegetation, and permanent seeding. Sediment control BMPs, installing silt fences or placing straw wattles below slopes, installing berms and other temporary run-on and runoff diversions. These BMPs are only examples of what should be considered and shall not preclude the use of equally or more effective new or innovative approaches currently available or being developed. Final selection of BMPs will be subject to approval by City of Salinas. The SWPPP will be kept on site during construction activity and will be made available upon request to representatives of the RWQCB or the City of Salinas.

Mitigation Measure 3.6-2: Prior to issuance of grading permits, the project proponent shall submit to the Salinas Public Works Department the project Improvement Plans. The Improvement Plans shall be consistent with the City's Development Standards, Standard Plans, and current NPDES permit requirements at the time of permitting. The NPDES permit granted to the City of Salinas by the Central Coast RWQCB (RWQCB – Central Coast Region, 2019) requires the following:

I. Erosion and Sediment Control BMPs – Erosion control and sediment control BMPs shall be designed, installed, and maintained to reduce the discharge of pollutants from construction sites to the maximum extent practical (MEP) and protect water quality;

II. Erosion and sediment from slopes and channels shall be controlled by implementing an effective combination of erosion control (source control) and other sediment control BMPs; and

III. Soil Stabilization – Stabilization of disturbed areas shall, at a minimum, be initiated immediately whenever any clearing, grading, excavating, or other earth disturbing activities have permanently ceased.

Additionally, the Improvement Plans shall be consistent with the requirements of the City's most current Stormwater Development Standards for New and Redevelopment Projects. The City of Salinas Stormwater Standards for New and Redevelopment Projects (City of Salinas, 2013) require the following practices:

I. Limit disturbance of creeks and natural drainage features and provide setbacks according to the City's latest NPDES permit;

II. Minimize compaction of highly permeable soils; and

III. Limit clearing and grading of native vegetation to the minimum needed to build the project and provide fire protection.

Mitigation Measure 3.6-3: Prior to the approval of site improvement plans, the project applicant shall submit to the Salinas Public Works Department a Stormwater Control Plan detailing plans and calculations for water quality best management practices (BMPs) and water quality detention/retention basins designed to meet the applicable regulatory requirements and to reduce contaminant loadings to receiving waters to the maximum extent practicable. The approved Stormwater Control Plans shall be submitted to Central Coast RWQCB through SMARTS as part of the project's SWPPP permit documents.

Mitigation Measure 3.6-4: Prior to the approval of site improvement plans, the project applicant shall submit to the Salinas Public Works Department a Stormwater Control Plan detailing plans and calculations for operational water quality best management

practices (BMPs) and water quality detention basins designed to prevent to the maximum extent practicable the creation of new sources of polluted runoff. Operational water quality BMPs may include extended detention basins, wet ponds/detention basins, porous pavement, inlet filters, vegetative BMPs, underground infiltration systems, vegetative swales, or storm drain stenciling and posting of signage. The detailed plans and calculations shall be subject to review and approval by the Salinas Public Works Department.

Mitigation Measure 3.6-5: Prior to the approval of site improvement plans, the project applicant shall submit a Hydrologic study as part of the Stormwater Control Plan to the Salinas Public Works Department with detailed plans and calculations for supplemental retention and peak flow control. BMPs will be designed to meet regulatory requirements and to reduce peak flows during storm events below peak flows under pre-project conditions. The detailed plans and calculations shall be subject to review and approval by the Salinas Public Works Department.

Mitigation Measure 3.6-6: Prior to the approval of site improvement plans, the project applicant shall site, and design and include an Operation and Maintenance Plan for, stormwater retention/infiltration basins and infiltration promoting BMPs sufficient to assure that there is no reduction in groundwater recharge. In order to assure there is no reduction in recharge, the plan shall result in circumstances which maintain infiltration to support baseflow and interflow to wetlands and surface waters, and deep vertical infiltration to groundwater. The site, design, and installation shall be consistent with the requirements of the City's Stormwater Development Standards for New and Redevelopment Projects. The contents of the site, landscaping (ground cover, bushes and trees, etc.) and irrigation (as applicable), design, and installation shall be included in a Stormwater Control Plan. The Stormwater Control Plan shall be reflected on the Improvement Plans and subject to review and approval by the Salinas Public Works Department and the City Planner. All basins shall be designed to have a natural appearance through the use of varied bank slopes (through grading) and appropriate landscaping (ground cover, bushes, trees, etc.) and irrigation (as applicable). A landscaping plan, irrigation plan and maintenance plan (all prepared by a qualified professional) shall be submitted for the review and approval of the Public Works Department and the City Planner.

Mitigation Measure 3.6-7: Prior to the approval of site improvement plans, the project applicant shall site, design, and include an Operation and Maintenance Plan for, post-construction BMPs and supplemental stormwater detention basins in accordance with City of Salinas stormwater development standards. Maintenance procedures (including frequency of procedure, cleaning schedules, applicant responsibility for each procedure, performance standards, or other means) and funding mechanisms shall be established for those facilities to assure adequate long-term performance and success in treating the water and controlling infiltration into the groundwater. The Improvement Plans and Operation and Maintenance Plan shall be subject to review and approval by the Salinas Public Works Department.

Mitigation Measure 3.6-8: Prior to the approval of site improvement plans, the project applicant shall submit an application for a letter of map revision based on fill (LOMR-F) to the City of Salinas floodplain administrator and FEMA with pertinent information and studies for approval that indicates no building construction would take place within remapped FEMA flood zones AE and A and that no changes to the regulated floodway will result in an increase in the base flood elevation or impact to the downstream waterways.

Mitigation Measure 3.6-9: Prior to the approval of site improvement plans, the project applicant shall submit for review and approval by the Salinas Public Works Department detailed grading plans and calculations designed to place enough fill onto the shaded Zone X area as to raise the land surface elevation above the base flood elevation so that flooding hazards are minimized to a FEMA flood standard. The project applicant shall submit an application for a LOMR-F to the City of Salinas floodplain administrator and FEMA with pertinent information for approval.

Mitigation Measure 3.6-10: Prior to the approval of site improvement plans, the project applicant shall submit for review and approval by the Salinas Public Works Department and the City Planner, detailed plans, calculations, landscaping (and irrigation as applicable) plans, and design basis reports for creek corridor restoration, including detention/retention/water quality basins, within the flood hazard extents identified as Zones A and AE that provide assurances that during large storm events, creek flows and sediment transport from upstream sources are not impeded at the same time as when the adjacent basins are at or near capacity. The design basis reports for creek corridor restoration shall also be submitted to the USACE, USFWS, and RWQCB and any required permitting processed prior to City approval. All basins shall be designed to have a natural appearance through the use of varied bank slopes (through grading) and appropriate landscaping (ground cover, bushes, trees, etc.) and irrigation (as applicable). A landscaping plan, irrigation plan and maintenance plan (all prepared by a qualified professional) shall be submitted for review and approval of the Public Works Department and the City Planner.

Mitigation Measure 3.6-11: Prior to the approval of site improvement plans, the project applicant shall submit a Stormwater Control Plan that provides sufficient supporting documentation and calculations to the Salinas Public Works Department to address sediment transport issues of fine grained materials from upstream and local sources that could clog infiltration capacities and could fill required storage space within the stormwater basins at the downstream boundaries of the project area to the extent practicable.

The calculations to address these sediment transport issues may include:

- A streamflow and sediment transport (bedload and suspended sediment) data collection monitoring program that begins one- to two-years pre-construction

and continues through a mandated post-project timeframe and would provide volumetric information for calculations related to the potential for sediment deposition.

- Pre-project measurements could be used to estimate sediment loading, which could inform the design of mitigation measures and enable estimates of maintenance frequencies needed ensure ongoing efficacy of the measures. During project execution and after project completion, measurements of bedload and suspended sediment in the channel at the downstream boundary of the project could be used to verify performance of sediment management measures and avoidance of associated sediment transport impacts.

- The United States Geological Survey gage record on Gabilan Creek (#11152600) contains limited suspended sediment data that was collected in March and April of 2017. These data could be used to compare to and/or validate measurements obtained via field data collection. Strategies and measures to address these sediment transport issues may include:

- Bioretention Basins: Bioretention basin features provide multiple water quality functions for stormwater systems, including performing as depositional areas for sediments that settle and get trapped in the bioretention media.

  An operations and maintenance plan shall be used to address specific maintenance requirements related to sediment accumulation, such that basin media remediation would take place when a threshold condition (such as a certain amount of sediment accumulation on the basin floor) is reached. For instance, if sediment deposition exceeds a depth of 2-inches, even a small patch, the sediment would require removal to keep the basin functioning properly.

  Furthermore, the functional lifespan of bioretention media (mulch, soils, drain rock, underdrain) is generally about 15 years. Annual monitoring reports could be used to track basin performance under varying wet season conditions and used to guide media replacement timing.

- Treatment Wetlands: Treatment wetlands are designed to mimic the natural infiltration, nutrient cycling, habitat, and a myriad of other important ecological functions provided by natural wetlands. Treatment wetlands could be constructed at storm drain outfall locations or adjacent to or off-channel from a creek channel. Wetlands could vary between those that are highly designed and may need relatively high levels of maintenance to more naturally based designs that may need more limited maintenance, each with varying levels of treatment potential.

Treatment performance is a function of wetland to watershed ratio, wetland treatment design, area hydrology, hydraulic residence time, and source pollutants. The preferred residence time through wetlands varies based on vegetation type and quantity, water depth, temperature, and design flow rates. Having a lower design flow rate can result in longer hydraulic residence time, which is preferred particularly at the start of a rainy season, since the "first flush" volume of stormwater runoff will generally contain the highest concentrations of pollutants. Treatment wetland design generally considers dry season irrigation return flows and first flush principles.

- Vegetated Banks/Riparian Corridor: Trees and other riparian corridor vegetation appropriate to the environment, such as willows, could grow rapidly on channel banks and trap sediments, removing sediment from streamflows as well as from local surface runoff.

- Floodplains: Floodplains provide one of the most important storage spaces for sediment as it moves discontinuously through a watershed. Naturally functioning floodplains generally extend laterally past the immediate riparian buffer zone into relatively flat areas. Floodplain access could be provided by bank and channel grading at specified design storm flows. The rate of sediment deposition on floodplains is largely dependent on the frequency of inundating flows, the suspended sediment loads in the river, available floodplain area, and presence of vegetation.

Mitigation Measure 3.6-12: Prior to the approval of site improvement plans, the project applicant shall provide an Operation and Maintenance Plan as part of the Stormwater Control Plan with sufficient supporting documentation and calculations for review and approval by the Salinas Public Works Department demonstrating that risks associated with reduction of infiltration capacity in the detention/retention/water quality basins shall be minimized to the maximum extent practicable.

Mitigation Measure 3.6-13: Prior to the approval of site improvement plans, the project applicant shall provide the Salinas Public Works Department with sufficient supporting documentation and calculations that the risks associated with basin embankment side slope failure because of the noncohesive nature of Gabilan and Natividad Creek corridor sediments will be minimized to the extent practicable.

Mitigation Measure 3.6-14: Prior to the approval of site improvement plans, the project applicant shall provide operations, maintenance, and SWPPP procedures for review and approval by the Salinas Public Works Department such that any detention/retention/water quality basin issues associated with sedimentation or loss of infiltration capacities are addressed by the operations, maintenance, and SWPPP procedures. Should the Salinas Public Works Department find that sedimentation or loss of infiltration capacities are addressed and subsequently approve the operations,

maintenance, and SWPPP procedures, the applicant shall implement the procedures through the lifetime of the project.

Mitigation Measure 3.6-15: Prior to the approval of site improvement plans, the project applicant shall provide the Salinas Public Works Department with operations, maintenance, and SWPPP procedures such that any detention/retention/water quality basin issues associated with embankment side slope failures are addressed by the operations, maintenance, and SWPPP procedures. Should the Salinas Public Works Department find that any detention/retention/water quality basin issues associated with embankment side slope failures are addressed and subsequently approve the operations, maintenance, and SWPPP procedures, the applicant shall implement the procedures through the lifetime of the project.

All basins shall be designed to have a natural appearance through the use of varied bank slopes (through grading) and appropriate landscaping (ground cover, bushes, trees, etc.) and irrigation (as applicable). A landscaping plan, irrigation plan and maintenance plan (all prepared by a qualified professional) shall be submitted for review and approval of the Public Works Department and the City Planner.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable.

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
11. MINERAL RESOURCES. *Would the project:*					
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒	☐
(b) Result in the loss of availability of a locally important mineral resource recovery site delineated on	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
a local general plan, specific plan or other land use plan?					

Discussion

Responses a-b): As the CASP Draft EIR explained on Page 1.0-19 of the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002), there is a quarry located in the northeastern portion of the Salinas Planning Area near the FGA, but outside of the Specific Plan Area. The quarry is designated by the State Division of Mines and Geology as an Aggregate Resource Area and has been mined for Dolomite deposits for many years. Mining activities are ongoing at this quarry facility, and are anticipated to continue for at least fifty (50) years. Development within the CASP does not conflict with the mining activities at this quarry and there are no other designated mineral resources or mining activities proximate to the Specific Plan Area. Furthermore, it was determined in the *Final Supplement for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) that development of the Future Growth Area, including the Specific Plan Area, would not have a significant impact on mineral resources or mining activities. Additionally, the *Final Supplement for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that impacts related to Mineral Resources associated with the FGAs, which includes the Specific Plan, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002).

As such, implementation of the CASP and implementing tentative subdivision maps would have no impact on mineral resources and this topic does not warrant additional analysis and was not addressed further in the Draft EIR.

Applicable Mitigation from Prior EIR (if any)

No mitigation is required. The General Mitigation Measures discussed above imposed duties on the City of Salinas, and not on individual property owners within the CASP.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
12. NOISE. *Would the project result in:*					
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒	☐
(b) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of ambient levels?	☐	☐	☐	☒	☐
(c) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒	☐
(d) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
noise levels?					

Discussion

Overall conclusion: The CASP EIR provides project-level detail with respect to the noise-related effects of the proposed tentative subdivision map, in part due to the comprehensive character of the mitigation measures required to reduce such effects. The tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the noise-related impacts of the proposed tentative subdivision map.

Pages 3.7.1 to 3.7.36 of the Draft EIR provide a general description of the existing noise sources in the project vicinity, a discussion of the regulatory setting, and identifies potential noise impacts associated with the CASP and the development planned to occur therein. Project impacts are evaluated relative to applicable noise level criteria and to the existing ambient noise environment. Mitigation measures have been identified for significant noise related impacts. The noise analysis was completed by J.C. Brennan & Associates. Inc. (December 2018). The noise data and technical report are included as **Appendix H** of the Draft EIR. No comments related to noise were received during the public review period for the Notice of Preparation of the Draft EIR.

Responses a) and b):

Impact 3.7-1 of the Draft EIR: The proposed project has the potential to increase traffic noise levels at existing receptors (Significant and Unavoidable) (see Mitigation Measures 3.7-1 through 3.7-8)

Tables 3.7-8 through 3.7-11 of the Draft EIR show the predicted traffic noise level increases on the local roadway network for Existing No Project, Existing + Project, Existing + Project + West Area Specific Plan (WASP), Cumulative, Cumulative + Project, and Cumulative + Project + WASP conditions. **Appendix H** of the Draft EIR provides the complete inputs and results of the FHWA traffic noise modeling.

As shown in Tables 3.7-8 through 3.7-11 of the Draft EIR, some noise-sensitive receptors located along the Specific Plan Area roadways are currently exposed to exterior traffic noise levels exceeding the City of Salinas 60 dB Ldn exterior noise level standard for residential uses. These receptors would continue to experience elevated exterior noise levels with implementation of the proposed project. For example, under Existing conditions, existing sensitive receptors located adjacent to E. Boronda Road, Constitution Boulevard, Natividad Road, and San Juan Grade Road currently experience an exterior noise levels between 61 dB and 69 dB Ldn. This exceeds the City's Normally Acceptable exterior noise level standard of 60 dB Ldn. Under Existing Plus Project conditions, exterior traffic noise levels are predicted to be approximately 68.0 dB Ldn. This would still exceed the City's Normally Acceptable exterior noise level standard of 60 dB Ldn. The CASP's contribution to these noise levels ranges between 0.4 dB and 2.5 dB and in some cases would not exceed the FICON criteria (Table 3.7-7). Table 3.7-8 of the Draft EIR indicates where a significant increase in traffic levels occur, or a result of an exceedance of the City's criterion of 60 dB Ldn.

As shown in Table 3.7-8 of the Draft EIR, the segment of Natividad Road south of E. Boronda Road would experience unacceptable noise levels under Existing Plus Project conditions. The project would cause noise levels along this segment to increase by 1.6 dB. It should be noted that Russell Road, east of Natividad and Constitution Boulevard, north of Boronda Road are not currently constructed and borders the north and east portions of the Specific Plan Area. There are no residential uses on the north side of the new Russell Road and the east side of Constitution Boulevard. Therefore, this analysis does not consider this to be a significant increase in noise levels. There is an analysis later in this report which evaluates the traffic noise on the new Russell Road and Constitution Boulevard, as they may affect the Specific Plan Area.

The following indicates where the project results in a significant traffic noise impact.

As shown in Table 3.7-8, the following roadway segments would experience unacceptable noise levels under the Existing Plus Project conditions:

- E. Boronda Road from Constitution to N. Sanborn (results in an exceedance of 60 dB Ldn).

As shown in Table 3.7-9 of the Draft EIR, the following roadway segments would experience unacceptable noise levels under the Existing Plus Project Plus WASP conditions:

- E. Boronda Road from San Juan Grade to McKinnon (results in a 1.9 dB increase);
- E. Boronda Road from El Dorado to Natividad (results in a 3.2 dB increase);
- E. Boronda Road from Natividad to Independence (results in a 2.1 dB increase);

- E. Boronda Road from Constitution to N. Sanborn (results in an exceedance of 60 dB Ldn);
- E. Boronda Road from N. Sanborn to Williams (results in an exceedance of 60 dB Ldn);
- Independence Blvd, south of Boronda (results in a 3 dB increase);
- Natividad Road, south of Boronda (results in a 3.6 dB increase);
- Natividad Road from E. Boronda to Future Russell Rd (results in a 4.2 dB increase);
- Russell Road, west of San Juan Grade (results in a 3.1 dB increase).

As shown in Table 3.7-10 of the Draft EIR, the following roadway segments would experience unacceptable noise levels under Cumulative Plus Project (CASP) conditions:

- E. Boronda Road from Independence to Hemmingway (results in a 1.6 dB increase);
- E. Boronda Road from Hemmingway to Constitution (results in a 2.9 dB increase);
- Old Stage Road north of future Constitution (results in an exceedance of 60 dB Ldn);
- Russell Road, west of San Juan Grade (results in a 1.6 dB increase).

As shown in Table 3.7-11 of the Draft EIR, significant traffic noise increases under the Cumulative Plus Project (CASP) Plus WASP traffic condition include the following:

- E. Boronda Road San Juan Grade to McKinnon – noise levels are predicted to increase by 1.7 dB from 65.4 dB to 67.1 dB Ldn. This would exceed the FICON criteria of +1.5 dB where no project noise levels are greater than 65 dB, as outlined in Table 3.7-7 of the Draft EIR.
- E. Boronda Road, Natividad to Independence – noise levels are predicted to increase by 2.0 dB from 66.8 dB to 68.8 dB Ldn. This would exceed the FICON criteria of +1.5 dB where no project noise levels are greater than 65 dB, as outlined in Table 3.7-7 of the Draft EIR.
- E. Boronda Road, Independence to Hemmingway – noise levels are predicted to increase by 2.1 dB from 65.5 dB to 67.6 dB Ldn. This would exceed the FICON criteria of +1.5 dB where no project noise levels are greater than 65 dB, as outlined in Table 3.7-7 of the Draft EIR.
- E. Boronda Road, Hemmingway to Constitution – noise levels are predicted to increase from 57.8 dB to 60.7 dB Ldn. This would result in an exceedance of the City of Salinas exterior noise level standard of 60 dB Ldn.
- N. Sanborn Road, south of E. Boronda – noise levels are predicted to increase from 59.1 Db to 60.7 dB Ldn. This would result in an exceedance of the City of Salinas exterior noise level standard of 60 dB Ldn.
- Natividad Road, E. Boronda to Future Russell Road – noise levels are predicted to increase by 3.4 dB from 64.4 dB to 67.8 dB Ldn. This would exceed the

FICON criteria of +3 dB where no project noise levels are between 60 to 65 dB, as outlined in Table 3.7-7 of the Draft EIR.

- Old Stage Road, north of Future Constitution Road – noise levels are predicted to increase from 59.1 dB to 61.4 dB Ldn. This would exceed the City of Salinas exterior noise level standard of 60 dB Ldn. This is part of the WASP area where future noise-sensitive uses would be located.
- Old Stage Road, Future Constitution Road to Williams – noise levels are predicted to increase from 58.7 dB to 60.2 dB Ldn. This would exceed the City of Salinas exterior noise level standard of 60 dB Ldn.
- Russell Road, West of San Juan Grade – noise levels are predicted to increase by 2.3 dB from 65.5 dB to 67.8 dB Ldn. This would exceed the FICON criteria of +1.5 dB where no project noise levels are greater than 65 dB, as outlined in Table 3.7-7 of the Draft EIR.

CONCLUSION

The CASP would cause increased noise levels exceeding the City of Salinas 60 dB Ldn exterior noise level standard at existing residential receptors. Therefore, this would be a **potentially significant** impact. Additionally, traffic noise level increases would exceed the FICON CEQA substantial increase criteria of 1.5 to 5 dB, as outlined in Table 3.7-7 of the Draft EIR. Therefore, this would be a **potentially significant** impact.

The Specific Plan Area was assumed for urban development under the City's General Plan and General Plan FEIR. As such, development of the Specific Plan Area for urban uses was analyzed in the General Plan FEIR. Build-out of the City's General Plan land use map, including the Specific Plan Area, will inherently result in an increase in traffic-related noise levels. The City of Salinas certified the Final Environmental Impact Report, Salinas General Plan (City of Salinas, 2002), adopted a statement of overriding considerations relative to this significant and unavoidable impact, and approved the Salinas General Plan. Subsequently, the Final Supplemental for the Salinas General Plan Final Program EIR (City of Salinas, 2007) indicated that noise impacts associated with the North of Boronda Future Growth Area (FGA), which includes the Specific Plan Area (with the exception of the Settrini/Garcia/Igaz properties), would not be different than those discussed in the Final Environmental Impact Report, Salinas General Plan (City of Salinas, 2002).

Increasing the height of existing sound walls could be a potential mitigation measure in some locations; however, in some locations it may prove impractical or infeasible for a variety of reasons. The footings for the walls would need to be reengineered and resized, which may result in encroachment into private property. Such encroachment would require private property owners to allow permission to enter their property. There is a possibility that private property owners have pools or other structures proximate to the existing walls that could inhibit the reconstruction of the sound wall. Also, the height of a sounds wall could result in aesthetic impacts that are unwanted in the community.

The use of quieter pavement technologies could be a potential mitigation measure. Research shows that a minimum of 3 dBA can be achieved by using alternative pavements, such as rubberized asphalt or open gap materials. Costs for these pavement technologies vary, but they have been proven to be comparable to traditional pavements. However, alternative pavement tends to wear down as trucks and automobiles travel over these roadway segments, decreasing its noise reduction effectiveness and increasing replacement costs. As such, rubberized asphalt is not highly desirable in most communities in California and would not be feasible or practicable in the City of Salinas in the long term.

The CASP would implement several mitigation measures that are specifically intended to ensure compliance with the City of Salinas noise standards. This includes Mitigation Measure 3.7- 1 and -2, which impose construction related measures to mitigate construction traffic and other construction vehicle noise to the extent feasible by limiting the hours of construction activities, equipping construction equipment with factory equipped mufflers, locating stationary noise generating equipment (i.e., generators) at least 300 feet from a sensitive receptor, and locating construction staging areas at least 300 feet from a sensitive receptor. These two construction-related mitigation measures would ensure that traffic noise levels at existing sensitive receptors during construction activities are minimized by condensing the hours that construction traffic on area roadways would occur and by requiring construction vehicles associated with staging areas be located 300 feet or further from the nearest existing receptor.

Additionally, Mitigation Measures 3.7-3, -4, and -5 provide requirements for the installation of noise barriers (i.e. sounds walls/berms), and the use of building materials that will reduce traffic noise levels on adjacent noise sensitive uses. Mitigation Measure 3.7-6 provides requirements for designing parks/play areas to ensure appropriate separation/buffer between noise and the noise sensitive areas. Mitigation Measure 3.7-7 provides requirements for design of commercial, business professional, office, or similar uses that abut residential uses to ensure that operations do not cause noise impacts. Lastly, Mitigation Measure 3.7-8 includes requirements for well sites to ensure that they are designed and built to not exceed acceptable noise levels. Nevertheless, even with implementation of these mitigation measures, there is the potential for noise levels to exceed the acceptable levels in some cases if encroachment into private property proves for the construction of sounds walls proves to be infeasible. As discussed previously, such encroachment would require private property owners to allow permission to enter their property and there is a possibility that private property owners have pools or other structures proximate to the existing walls that could inhibit the reconstruction of the sound wall. Also, the height of a sounds wall could result in aesthetic impacts that are unwanted in the community. Given that there is a possibility of not being able to feasibility install sounds walls in some locations, there will remain a possibility that the noise impact exceeds the acceptable levels. This would be a **significant and unavoidable** impact.

Impact 3.7-4 of the Draft EIR: The proposed project has the potential to expose new sensitive receptors to excessive transportation noise (Less than Significant with Mitigation) (see Mitigation Measures 3.7-3, 3.7-4 and 3.7-5 below)

EXTERIOR NOISE IMPACTS

The FHWA traffic noise prediction model was used to predict Cumulative + Project + WASP traffic noise levels at the proposed residential land uses associated with the CASP. Table 3.7-14 of the Draft EIR shows the predicted traffic noise levels at the proposed residential uses adjacent to the major Specific Plan Area arterial roadways. Table 3.7-14 of the Draft EIR also indicates the property line noise barrier heights required to achieve compliance with an exterior noise level standard of 60 dB Ldn.

The complete inputs and results to the FHWA traffic noise prediction model and barrier calculations are contained in Appendix C of the Noise Study (see **Appendix H** of the Draft EIR). The modeled noise barriers assume flat site conditions where roadway elevations, base of wall elevations, and building pad elevations are approximately equivalent.

To describe future noise levels due to traffic, FHWA Highway Traffic Noise Prediction Model (FHWA RD-77-108) was used. Direct inputs to the model included traffic volumes provided by Fehr & Peers (2019). The FHWA model is based upon the Calveno reference noise factors for automobiles, medium trucks and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site. The FHWA model was developed to predict hourly Leq values for free-flowing traffic conditions. To predict Ldn/CNEL values, it is necessary to determine the day/night distribution of traffic and adjust the traffic volume input data to yield an equivalent hourly traffic volume.

CONCLUSION

Table 3.7-14 for the Draft EIR data indicate that noise barriers 6- to 8-feet in height would generally be sufficient to achieve compliance with the City of Salinas 60 dB Ldn exterior noise level standard for the proposed residential uses. However, for the residential uses located along E. Boronda Road, sound walls of 6- to 8-feet in height would only reduce exterior noise levels to 63 dB Ldn. While these noise level do not meet the City's preferred 60 dB Ldn noise standards, they would comply with the City's conditionally acceptable standard of 60 to 70 dB Ldn. Final wall heights should be determined at the discretion of the City. With implementation of the following exterior noise mitigation measures, the proposed project would have a ***less than significant*** impact relative to this environmental topic.

INTERIOR NOISE IMPACTS

Modern construction typically provides a 25-dB exterior-to-interior noise level reduction with windows closed. Therefore, sensitive receptors exposed to exterior noise of 70 dB Ldn, or less, will typically comply with the City of Salinas 45 dB Ldn interior noise level standard. Additional noise reduction measures, such as acoustically-rated windows, are generally required for exterior noise levels exceeding 70 dB Ldn. It should be noted that exterior noise levels are typically 2 to 3 dB higher at second floor locations. Additionally, noise barriers do not reduce exterior noise levels at second floor locations. The proposed residential uses are predicted to be exposed to unmitigated first floor exterior transportation noise levels ranging between 63 to 71 dB Ldn. Therefore, second floor facades are predicted to be exposed to exterior noise levels of up to 65 to 73 dB Ldn.

Based upon a 25-dB exterior-to-interior noise level reduction, interior noise levels are predicted to range between 38 dB to 46 dB Ldn at first floor residences, and between 40 dB and 48 dB Ldn, at second floor residences. Predicted interior noise levels would exceed the City's 45 dB Ldn interior noise level standard at the first row of residential uses located closest to Boronda Road and Constitution Boulevard. Therefore, additional interior noise control measures would be required for these residential uses. To reduce interior noise levels to 45 dB Ldn, or less, it is likely that second floor facades would require windows having a Sound Transmission Class (STC) 35 rating, or higher. Exterior walls would also likely require 3-coat stucco and RC-channels. This would specifically apply to the first row of homes along E. Boronda Road and Constitution Boulevard and would not apply to facades facing away from the roadway.

CONCLUSION

This analysis assumes that mechanical ventilation will be provided to allow residents to keep doors and windows closed, as desired for acoustical isolation. With implementation of the following interior noise mitigation measures, the proposed project would have a ***less than significant*** impact relative to this environmental topic.

Impact 3.7-5 of the Draft EIR: The proposed project has the potential to expose sensitive receptors to substantial noise from proposed park and school uses (Less than Significant with Mitigation) (See Mitigation Measure 3.7-6 below)

Children playing at neighborhood parks or outdoor recreational fields (softball, soccer, basketball, tennis) are often considered potentially significant noise sources which could adversely affect adjacent noise-sensitive land uses. Typical noise levels associated with groups of approximately 50 children playing at 50 feet generally range from 55 to 60 dB Leq and 70 to 75 dB Lmax. It is expected that park activities would occur primarily during daytime hours. Therefore, noise levels from the playgrounds would need to comply with the City of Salinas exterior noise level standards of 60 dB Leq and 70 dB Lmax at the nearest residential uses.

Based upon the referenced noise level data discussed above, the 60 dB Leq noise contour would be located approximately 50 feet from the center of playgrounds or recreational fields. The 70 dB Lmax noise contour would extend approximately 90 feet from the center of playground or recreational fields. For residential backyards located less than 90 feet from the center of a playground or recreational field, noise levels may exceed the City of Salinas 70 dB Lmax exterior noise level standard. In this case, construction of a 6-foot tall masonry sound wall would provide an approximate noise level reduction of 5 dB and would typically reduce noise levels to 60 dB Leq and 70 dB Lmax, or less. With implementation of the following exterior mitigation measure, the proposed project would have a ***less than significant*** impact relative to this environmental topic.

Impact 3.7-6: The proposed project has the potential to expose sensitive receptors to substantial noise from proposed commercial mixed uses (Less than Significant with Mitigation) (see Mitigation Measure 3.7-7 below)

COMMERCIAL AND OFFICE LAND USES

Mixed use commercial land use activities can produce noise levels which affect adjacent sensitive land uses. These noise sources can be continuous and may contain tonal components which may be annoying to individuals who live in the vicinity. In addition, noise generation from fixed noise sources may vary based upon climatic conditions, time of day, and existing ambient noise levels. The primary noise sources generally include truck deliveries, trash pickup, parking lot use, and heating, ventilation, and air conditioning (HVAC) equipment operation. These sources may result in noise levels exceeding the City's standards at nearby receptors.

MECHANICAL EQUIPMENT

HVAC equipment can be a primary noise source associated with commercial mixed uses. These types of equipment are often mounted on roof tops, located on the ground, or located within mechanical rooms. The noise sources can take the form of fans, pumps, air compressors, chillers, or cooling towers. Noise levels from these types of equipment can vary significantly. Noise levels from these types of sources generally range between 45 dB to 70 dB at 50 feet and could exceed City standards at nearby receptors.

MEASURES TO REDUCE NOISE EXPOSURE FROM COMMERCIAL MIXED USES

Use of Setbacks: Noise exposure may be reduced by increasing the distance between the noise source and the noise-receiving use. Setbacks can take the form of open space, frontage roads, recreational areas, etc. The available noise attenuation from this technique is limited by the characteristics of the noise source, but is generally 3 to 6 dB per doubling of distance from the source. The rule-of-thumb is that most traffic and railroad noise levels will decrease or increase by approximately 4.5 dB per doubling, or

halving of distance, respectively. Noise from point sources, such as HVAC equipment, will generally attenuate at 6 dB per doubling of distance.

Use of Barriers: Noise reduction can be accomplished by placing walls, berms or other structures, such as buildings, between the noise source and the receiver. In addition, intervening topography can be an effective barrier for noise control. The effectiveness of a barrier depends upon blocking line-of-sight between the source and receiver, and is improved with increases in distance the sound must travel to pass over the barrier as compared to a straight line from source to receiver. The difference between the distance over a barrier and a straight line between source and receiver is called the "path length difference," and is the basis for calculating barrier noise reduction. Walls within the interior of the Specific Plan are generally not encouraged.

In general, barriers are most effective when placed close to either the receiver or the source. An intermediate barrier location yields a smaller path length difference for a given increase in barrier height than does a location closer to either source or receiver.

Site Design, Building Locations, and Building Orientations: Buildings can be placed on a project site to shield other structures or areas, to remove them from noise-impacted areas, and to prevent an increase in noise levels caused by reflections. As an example, carports or garages can be used to form or complement a barrier, or shield an outdoor activity area. Placement of outdoor activity areas on the opposite side of the building facades from the noise source, or within the shielded portion of a building complex, such as a central courtyard, can also be an effective method of providing a quiet retreat in an otherwise noisy environment.

CONCLUSION

With implementation of the following exterior mitigation measure, the proposed project would have a ***less than significant*** impact relative to this environmental topic.

Impact 3.7-7 of the Draft EIR: The proposed project has the potential to expose sensitive receptors to substantial noise from proposed well sites (Less than Significant with Mitigation) (see Mitigation Measure 3.7-8 below)

Typical noise levels for well sites at 50 feet are expected to be 60 dB Leq. If a backup generator is present and running, a noise level of 70 dB Leq at 50 feet would be expected. It is expected that wells could operate during daytime or nighttime hours. Long-term operation of the backup generator would only occur under emergency conditions and would therefore not be subject to the City of Salinas exterior noise level standards for Class A noise. However, weekly exercising of the generator may be subject to the City's 60 dB Leq daytime exterior noise level standard at the nearest noise sensitive residential receptors.

The specific design features of the well sites are not currently known and the associated noise levels cannot be precisely determined at the nearest proposed residential units. Therefore, the well sites should be limited to generating a noise level not exceeding the City's nighttime noise standard of 55 dB Leq at the nearest on-site residential property lines under normal operations. Generators should not exceed the City's daytime noise standard of 60 dB Leq. This will ensure compliance with the City's noise ordinance standards at both on-site and off-site receptors. With implementation of Mitigation Measure 3.7-8, the proposed project would have a ***less than significant*** impact relative to this environmental topic.

Impact 3.7-8: Cumulative exposure of existing and future noise-sensitive land uses to increased noise resulting from cumulative development (Cumulatively Considerable and Significant and Unavoidable)

The cumulative context for a cumulative analysis can be defined by region, by political subdivision or by the geography. The cumulative setting for noise includes the study roadway segments as identified in the traffic analysis in the Draft EIR. This area was chosen because it represents the area that is reasonably expected to be affected by changes to the ambient noise levels as the project builds out. Tables 3.7-10 and 3.7-11 of the Draft EIR previously referenced above provide the predicted traffic noise level increases on the local roadway network for Cumulative, Cumulative + Project, and Cumulative + Project + WASP conditions. **Appendix H** of the Draft EIR provides the complete inputs and results of the FHWA traffic noise modeling.

As shown in Tables 3.7-10 and 3.7-11 of the Draft EIR, some noise-sensitive receptors located along the Specific Plan Area roadways are currently exposed to exterior traffic noise levels exceeding the City of Salinas 60 dB Ldn exterior noise level standard for residential uses. These receptors would continue to experience elevated exterior noise levels with implementation of the proposed project.

In some locations, development within the CASP is predicted to cause increases in traffic noise levels which would trigger a new exceedance of the City of Salinas' 60 dB Ldn exterior noise level standard at sensitive receptor locations, or exceed the FICON allowable increase criteria outlined in Table 3.7-7 of the Draft EIR. The greatest number of significant traffic noise increases would occur under the Cumulative Plus Project Plus WASP traffic condition.

Significant traffic noise increases under the Cumulative Plus Project Plus WASP traffic condition include the following:

- E. Boronda Road San Juan Grade to McKinnon – noise levels are predicted to increase by 1.7 dB from 65.4 dB to 67.1 dB Ldn. This would exceed the FICON criteria of +1.5 dB where no project noise levels are greater than 65 dB, as outlined in Table 3.7-7 of the Draft EIR.

- E. Boronda Road, Natividad to Independence – noise levels are predicted to increase by 2.0 dB from 66.8 dB to 68.8 dB Ldn. This would exceed the FICON criteria of +1.5 dB where no project noise levels are greater than 65 dB, as outlined in Table 3.7-7 of the Draft EIR.
- E. Boronda Road, Independence to Hemmingway – noise levels are predicted to increase by 2.1 dB from 65.5 dB to 67.6 dB Ldn. This would exceed the FICON criteria of +1.5 dB where no project noise levels are greater than 65 dB, as outlined in Table 3.7-7 of the Draft EIR.
- E. Boronda Road, Hemmingway to Constitution – noise levels are predicted to increase from 57.8 dB to 60.7 dB Ldn. This would result in an exceedance of the City of Salinas exterior noise level standard of 60 dB Ldn.
- N. Sanborn Road, south of E. Boronda – noise levels are predicted to increase from 59.1 dB to 60.7 dB Ldn. This would result in an exceedance of the City of Salinas exterior noise level standard of 60 dB Ldn.
- Natividad Road, E. Boronda to Future Russell Road – noise levels are predicted to increase by 3.4 dB from 64.4 dB to 67.8 dB Ldn. This would exceed the FICON criteria of +3 dB where no project noise levels are between 60 to 65 dB, as outlined in Table 3.7-7 of the Draft EIR.
- Old Stage Road, north of Future Constitution Road – noise levels are predicted to increase from 59.1 dB to 61.4 dB Ldn. This would exceed the City of Salinas exterior noise level standard of 60 dB Ldn. This is part of the WASP area where future noise sensitive uses would be located.
- Old Stage Road, Future Constitution Road to Williams – noise levels are predicted to increase from 58.7 dB to 60.2 dB Ldn. This would exceed the City of Salinas exterior noise level standard of 60 dB Ldn.
- Russell Road, West of San Juan Grade – noise levels are predicted to increase by 2.3 dB from 65.5 dB to 67.8 dB Ldn. This would exceed the FICON criteria of +1.5 dB where no project noise levels are greater than 65 dB, as outlined in Table 3.7-7 of the Draft EIR.

The development of the CASP would cause increased noise levels exceeding the City of Salinas 60 dB Ldn exterior noise level standard at existing residential receptors. Therefore, there would be a cumulative exposure of existing and future noise-sensitive land uses to increased noise resulting from cumulative development.

The proposed project, when considered alongside all past, present, and probable future projects (inclusive of buildout of the General Plan), would result in a significant cumulative impact related to traffic noise. The proposed project's incremental contribution toward this significant cumulative impact would be cumulatively considerable due to the large number of vehicle trips that would be generated at buildout of the Specific Plan Area.

It is noted that the City's General Plan and General Plan EIR assumes development of the Specific Plan Area for urban uses as part of the FGA buildout. As buildout occurs it will inherently result in an increase in traffic-related noise levels. The City of Salinas

certified the Final Environmental Impact Report, Salinas General Plan (City of Salinas, 2002), adopted a statement of overriding considerations relative to this significant and unavoidable impact, and approved the Salinas General Plan.

Implementation of the Central Area Specific Plan would have a ***significant cumulative impact*** and a ***cumulatively considerable contribution*** to noise.

Response c): The construction of new developments within the Specific Plan Area would increase temporary construction jobs in the area. As buildout of the project is expected to occur gradually in response to market demand, construction related employment would be similarly dispersed over time. Local construction companies are likely to find ample pools of employable personnel in the Salinas area, based on the current and projected employment trends. Due to the fact there is currently a surplus of unemployed workforce within the City, it is likely that area residents would fill the majority of these temporary construction positions.

Impact 3.7-2 of the Draft EIR: The proposed project has the potential to increase groundborne noise levels associated with construction activities (Less than Significant with Mitigation) (see Mitigation Measures 3.7-1 and 3.7-2)

During the construction of the project, including roads, water, and sewer lines, and related infrastructure, noise from construction activities would add to the noise environment in the project vicinity. Existing sensitive receptors are located in the nearby residences, some of which are as close as 50 feet from the proposed construction activities. As indicated in Table 3.7-12 of the Draft EIR, activities involved in construction would generate maximum noise levels ranging from 76 to 90 dB at 50 feet.

Construction activities would be temporary in nature and are anticipated to occur during normal daytime working hours which are the least sensitive hours. Additionally, the majority of construction activities would occur at distances of 300 to 500 feet from the nearest residences. At these further distances, the maximum noise levels due to construction at the interior of the site would range from 60 to 70 dBA.

Noise would also be generated during the construction phase by increased truck traffic on area roadways. A significant project-generated noise source would be truck traffic associated with transport of heavy materials and equipment to and from construction sites. This noise increase would be of short duration and would likely occur primarily during daytime hours. The proposed project has the potential to increase noise levels associated with construction activities. Construction activities would be temporary in nature and are exempt from noise regulation during the hours of 7:00 a.m. to 9:00 p.m., as outlined in the City's Municipal Code for Type B noise. Additionally, the Specific Plan Area was assumed for urban development as part of the City's General Plan and General Plan EIR. Build-out of the City's General Plan land use map, including the Specific Plan Area, will inherently result in construction and construction-related noise levels.

Mitigation Measure 3.7-1 requires that construction activities adhere to the hours of operation outlined in the Municipal Code, which would result in construction activities which take place during the exempt noise hours (i.e., 7:00 a.m. to 9:00 p.m.). Construction noise would, therefore, not occur before 7:00 a.m. or after 9:00 p.m. Mitigation Measure 3.7-2 requires equipping construction equipment with factory equipped mufflers, locating stationary noise generating equipment (i.e. generators) at least 300 feet from a sensitive receptor, and locating construction staging areas at least 300 feet from a sensitive receptor. By locating construction equipment at least 300 feet from a receptor, the resulting construction noise from various equipment shown in Table 3.7-12 of the Draft EIR would significantly decrease as the distance from the equipment increases. This is due to the fact that noise from point sources, such as generator equipment and other stationary noise sources, will generally attenuate at 6 dB per doubling of distance. Implementation of the following mitigation measures will ensure that these potential impacts are reduced to a ***less than significant*** level.

Impact 3.7-3 of the Draft EIR: The proposed project has the potential to increase groundborne vibration association with construction activities (Less than Significant)

The primary vibration-generating activities associated with the proposed project would happen during construction when activities such as grading, utilities placement, and road construction occur. Sensitive receptors which could be impacted by construction-related vibrations, especially vibratory compactors/rollers, are located approximately 100 feet or further from the Specific Plan Area. At this distance, construction vibrations are not predicted to exceed acceptable levels. Additionally, construction activities would be temporary in nature and would likely occur during normal daytime working hours.

Construction vibration impacts include human annoyance and building structural damage. Human annoyance occurs when construction vibration rises significantly above the threshold of perception. Building damage can take the form of cosmetic or structural. Table 3.7-13 of the Draft EIR shows the typical vibration levels produced by construction equipment.

Table 3.7-13 of the Draft EIR data indicate that construction vibration levels anticipated for the proposed project are less than the 0.1 in/sec criteria at distances of 50 feet. The proposed project would not increase noise vibration associated with construction activities. Therefore, construction vibrations are not predicted to cause damage to existing buildings or cause annoyance to sensitive receptors. Implementation of the proposed project would have a ***less than significant*** impact relative to this environmental topic.

Response d): The site is located approximately three miles (3) miles from the end of runway (13-31) of the Salinas Municipal Airport and is not located within the *Salinas Airport Future Noise Contours*, *Figure 5.3-2* of the Salinas General Plan, Final

Environmental Impact Report, 2002. Noise impacts from airport operations will not have an adverse impact on the site.

Applicable Mitigation from Prior EIR (if any)

Mitigation Measure 3.7-1: Prior to the approval of site improvement plans and respective permits, plans shall note that construction activities shall adhere to the requirements of the City of Salinas Municipal Code with respect to hours of operation.

Mitigation Measure 3.7-2: Prior to the approval of site improvement plans and respective permits, plans shall note that all equipment shall be fitted with factory equipped mufflers and in good working order. All stationary noise generating equipment (i.e. generators) shall be located at least 200 feet from a sensitive receptor. All construction staging areas shall be located at least 200 feet from a sensitive receptor.

Mitigation Measure 3.7-3: Prior to the approval of site improvement plans and respective permits, the plans shall note the location, design, and construction details of the eight-foot to nine-foot tall sound walls and/or landscaped berm/wall combinations, as applicable, that will be constructed along the primary Specific Plan Area roadways, adjacent to proposed residential dwellings, in order to achieve the City's exterior noise standards. At the City's discretion, wall heights which achieve the City's conditionally acceptable 60-70 dB Ldn noise standard may be allowed. See the Draft EIR Table 3.7-14 for specific noise barrier/wall heights along each roadway. Additionally, at the City's discretion, alternative noise reduction measures which achieve the City's conditionally acceptable 60-70 dB Ldn noise standard may be allowed. Alternative noise reduction measures, such as building orientation and use of noise-attenuating features, can be utilized provided that a site-specific acoustical analysis is conducted that demonstrates that the alternative methods would ensure that noise levels do not exceed the City's conditionally acceptable 60-70 dB Ldn noise standard.

Noise barrier walls shall be constructed of concrete panels, concrete masonry units, stucco or manufactured materials (with a density of four pounds per square foot or greater), earthen landscaped berms, or any combination of these materials as determined appropriate by the City of Salinas based upon the standards contained in the Central Area Specific Plan and the Salinas Zoning Code, as applicable. The design/appearance of the wall is subject to the design approval by the City of Salinas to ensure that it is visually pleasing. Wood is not permitted due to eventual warping and degradation of acoustical performance. The walls shall not have gaps or penetrations which allow sound to flank through or around the walls. Small gaps which may occur using materials such as "keystone" blocks shall be avoided.

Additionally, in accordance with Section 5-03.19 of the City's Municipal Code, best management practices shall be incorporated into the sound wall design in order to control graffiti and/or mitigate the potential impacts of graffiti. These graffiti prevention best management practices may include, without limitation:

(1) The use or the installation and maintenance of ant-graffiti materials and surface treatments approved by the City on likely graffiti-attracting surfaces.

(2) Installation and maintenance of landscaping to discourage defacement of and/or protect likely graffiti-attracting surfaces.

(3) Installation and maintenance of lighting to protect likely graffiti-attracting surfaces.

(4) Immediate removal of graffiti by appropriate means within seventy-two hours.

(5) Incorporation of architectural or design elements or features to discourage graffiti defacement in accordance with the principles of Crime Prevention Through Environmental Design (CPTED).

(6) Authorizing right of access by city employees or contract agents to remove graffiti if not removed within specified time periods.

(7) Supplying the city at its request with paint (of the appropriate color and type), cleaning agents, and/or other materials acceptable to the city to abate or to deter graffiti.

(8) Other requirements, as deemed reasonably feasible by the city planner, to deter, to protect or to reduce the potential for graffiti defacement.

Mitigation Measure 3.7-4: Prior to the approval of building permits, the first row of residential dwellings located along E. Boronda Road and Constitution Boulevard shall include windows having a Sound Transmission Class (STC) 35, or higher, rating installed in second floor facades and rooms that have windows or doors that abut or face E. Boronda Road and/or Constitution Boulevard. Exterior walls shall also require 3-coat stucco and RC-channels, sheathing, or another acceptable construction application that effectively attenuates noise intrusion to the interior of the house. The exterior wall specifications would specifically apply to the first row of homes that abut or face E. Boronda Road and/or Constitution Boulevard and only apply to the facades facing these roadways. The specifications do not apply to single story homes, or the first floor of a two-story home, both of which are attenuated by the sound wall. These requirements shall be included in the building plans for the specific dwelling units and noted on the building permits. A detailed analysis of any additional interior mitigation measures shall be conducted when building plans are available and prior to building permit issuance to verify these requirements. These requirements shall also be noted in the site improvement plans prior to approval by the City.

Mitigation Measure 3.7-5: Prior to the approval of building permits, mechanical ventilation shall be required in the first row of all residential dwellings that abut E.

Boronda Road and Constitution Boulevard, as desired for acoustical isolation, to keep their doors and windows closed and still maintain acceptable interior temperature and noise levels. This requirement shall be included in the building plans for the specific dwelling units and noted on the building permits. This requirement shall also be noted in the site improvement plans prior to approval by the City.

Mitigation Measure 3.7-6: Prior to the approval of site improvement plans, as applicable, when parks or play areas are located near residential uses, the center of active play areas, such as football fields, soccer fields or other athletic fields, shall be located at a minimum distance of 90-feet from the nearest residential property lines. Large active play areas shall comply with the 60 dB Leq and 70 dB Lmax standards, and shall include these further noise level evaluations during the design phases of future park areas.

Parks shall be designed such that residences front, or side in limited locations, where approved by the City Planner, to the park. Minimum 6-foot tall sound walls and/or landscaped berms shall be constructed where school site directly abuts a residential property line in instances where site design (i.e., minimum distances, siting of activity areas, etc.) cannot achieve the 60 dB Leq and 70 dB Lmax noise standards. No wall shall be required where residential uses are fronted towards a park or school site and separated by a roadway or a walkway.

Noise barrier walls shall be constructed of concrete panels, concrete masonry units, stucco or manufactured materials (with a density of four pounds per square foot or greater), earthen landscaped berms, or any combination of these materials as determined appropriate by the Salinas Public Works Department and the City Planner. The design/appearance of the walls is subject to the design approval by the Salinas Public Works Department and the City Planner based upon the standards contained in the Central Area Specific Plan and the Salinas Zoning Code, as applicable to ensure that it is visually pleasing. Wood is not permitted due to eventual warping and degradation of acoustical performance. The walls shall not have gaps or penetrations which allow sound to flank through or around the walls. Small gaps which may occur using materials such as "keystone" blocks shall be avoided. Additionally, in accordance with Section 5-03.19 of the City's Municipal Code, best management practices shall be incorporated into the sound wall design in order to control graffiti and/or mitigate the potential impacts of graffiti (see Mitigation Measure 3.7-3 for further discussion of best management practices).

Mitigation Measure 3.7-7: Prior to the approval of development review permits, the plans shall demonstrate: where mixed use, commercial, business professional, office, or similar uses face residential uses or where loading docks or truck circulation routes face residential areas, the following measures shall be included in the project design:

- All HVAC equipment shall be located within mechanical rooms where possible or shielded from view with solid or grated barriers;

- Emergency generators shall comply with the City's noise criteria at the nearest noise sensitive receivers;
- Delivery/loading activities shall comply with the Salinas Zoning Code standards and regulations; and
- The applicant shall submit a noise study to verify that the appropriate noise control measures have been incorporated into the project design and will achieve compliance with the City's noise level standards.

Mitigation Measure 3.7-8: The potential well sites are shown in the Specific Plan. The actual wells are subject to the approval of a Conditional Use Permit (CUP) by the City pursuant to the requirements of the Salinas Zoning Code and the Central Area Specific Plan. The potential well sites and the CUP requirement for said facilities shall be clearly noted on the site improvement plans. Prior to approval of the CUP and subsequent issuance of the building permits for the wells, the plans shall demonstrate that the following measures shall be included in the project design:

- The wells have been designed and will be built to not exceed a noise level of 55 dB Leq at the nearest residential or school property line during normal operation of the facilities;
- The generators shall not be permitted to exceed the City's daytime noise standard of 60 dB Leq;
- The generators shall be tested only during daytime hours; and
- Additionally, that the wells have been designed (in accordance with the Central Area Specific Plan) to incorporate decorative screen walls, landscaping and other features to ensure compatibility with surrounding land uses.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable.

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
13. PLANNING. *Would the project:* (a) Physically divide an	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
established community?					
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒	☐
(c) Create economic or social effects that will reasonably foreseeably lead to significant urban decay?	☐	☐	☐	☒	☐

Discussion

Response a): As the CASP Draft EIR explained on Pages 1.0-18 and 1.0-19, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002), concluded that the impact associated with planning issues would be reduced to a less than significant level with mitigation. Subsequently, the *Final Supplement for the Salinas General Plan Final Program EIR (EDAW/AECOM 2007)* indicated that the Land use and Planning impacts associated with Future Growth Areas (FGAs), which includes the CASP, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan (Cotton Bridges Associates 2002).*

As stated on Page 3.8-2 of the CASP Draft EIR, residential units are currently located within the Specific Plan Area. These residential units would to be demolished during the development of the CASP. However, the number of residential units within the Specific Plan Area is very small in comparison to the overall size of the Specific Plan Area. Additionally, development of the Specific Plan Area would facilitate physical access to and between nearby established communities, including the residential areas located to the south of the Specific Plan Area. Buildout of the CASP would also provide access to the proposed developments that are planned to be located to the east and west of the CASP Specific Plan Area (the other proposed developments of the North Boronda FGA, including the proposed West Area Specific Plan Area). Therefore, the CASP would have

a limited potential to divide an established community. Implementation of the CASP would have a less than significant impact relative to this environmental topic.

Response b): The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) noted that General Plan Land Use Plan assists in creating a balance between jobs and housing units within the City, and that a variety of land uses within the City of Salinas creates an important balance between the generation of public revenues and the provision of public services and facilities. Achieving and maintaining a balance of land uses ensures fiscal stability and also creates a desirable community in which people can live, shop, work, and recreate. New Urbanism principles, a component of the General Plan Land Use Element, were used to design a land use plan that is compact and pedestrian-friendly, with a mixture of uses surrounding activity centers/neighborhood focal points in the CASP. Higher density residential uses are proposed around retail, recreation, and public uses and all of these core activity centers are proposed to be connected with pedestrian, bicycle, and transit systems. The parcels located within the City's Sphere of Influence, but outside of the current City boundary, would be annexed to the City as part of the CASP. The Specific Plan Area would be consistent with the expected intensity of development within the Specific Plan Area under General Plan buildout conditions as analyzed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002).

The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) noted that the General Plan may impact the related land use plans and policies that have been adopted to avoid or mitigate an environmental effect. The Salinas Zoning Code, Salinas Redevelopment Plan, Greater Salinas Area Plan, Salinas Municipal Airport Master Plan, Monterey County Airport Land Use Plan, and Greater Salinas Area Memorandum of Understanding, are specifically mentioned. Of these documents, the proposed project does not affect an existing Specific Plan, the Salinas Municipal Airport Master Plan, or the Monterey County Airport Land Use Plan, and the Salinas Redevelopment Plan is no longer in effect. These plans/policies/regulations are not discussed further, but the other three (i.e. the Salinas Zoning Code; the Greater Salinas Area Plan; and the Greater Salinas Area Memorandum of Understanding) are discussed below.

Salinas Zoning Code: The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) noted that implementation of the General Plan will change existing General Plan land use designations for certain parcels within the City and that existing zoning designations for those parcels may not be consistent with the new land use designations. A significant impact associated with the Zoning Code may occur where zoning on specific parcels is inconsistent with new General Plan land use designations for those parcels.

To minimize and mitigate the potential impacts, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) presented Mitigation Measure LU1, which requires the City to review and update the Zoning Code and Subdivision

Ordinance to ensure consistency with the General Plan and to help implement the General Plan policies and New Urbanism principles. The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) concluded that with the implementation of the mitigation measure, the impact would be reduced to a less than significant level.

Subsequently, the *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that impacts associated with the FGAs, which includes the CASP, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002). Mitigation AG5 specifically addressed Agricultural Land Conservation Easement Program, which states that the City will work with the County of Monterey, and other local jurisdictions, to create and implement an agricultural land conservation easement program including such measures as securing the dedication of easements or by paying a mitigation fee that could be used to purchase easements through a mitigation bank. Additionally, in 2006, the City Council adopted Resolution No. 19422, approving the Agricultural Land Preservation Program. The resolution adopted a per acre mitigation fee for agricultural lands currently designated by the California Department of Conservation's Farmland Mapping Program as "Prime" or "of Statewide Importance." The City certified this EIR and approved annexation of the North of Boronda Future Growth Area, which includes the Specific Plan Area.

The Specific Plan Area is currently zoned New Urbanism Interim (NI) with a Specific Plan Overlay. The CASP includes a rezone to the zones as provided within the CASP. The purpose of the rezone is to ensure consistency between the proposed General Plan Land Use Designations and Zoning. With the approval of the rezoning application, the Specific Plan would be consistent with the Salinas Zoning Code.

Implementation of the CASP would not result in any new significant adverse impacts beyond those addressed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). The CASP EIR utilized the earlier analysis of this topic provided in *the Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) *and Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) pursuant to the tiering requirements of CEQA.

The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) concluded that with the impacts would be reduced to a **less than significant** level with mitigation. Subsequently, the *Final Supplement for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that Land Use and Planning impacts associated with the FGAs, which include the Specific Plan Area, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002).

The City certified this prior FEIR and approved a Sphere of Influence Amendment and annexation (except for the Settrini/Garcia/Igaz properties, which were not annexed but were included in the Sphere of Influence Amendment) of the North of Boronda FGA), which includes the Central Area Specific Plan. The CASP was and remains consistent with the GSA-MOU. All development under the CASP would be required to comply with the regulations, policies, and standards identified in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002), and *Final Supplement for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). Implementation of the CASP and supporting tentative subdivision maps would not result in any new significant adverse impacts beyond those addressed within these supporting documents. This topic does not warrant additional analysis and will not be addressed further in the EIR.

Greater Salinas Area Plan: The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) noted that implementation of General Plan will result in development outside the existing City limits, into the Greater Salinas Planning Area. Development occurring outside of the City limits is subject to the Greater Salinas Area Plan. The Greater Salinas Area Plan is a part of the Monterey County General Plan, and was first published in 1986. It was most recently updated in January 1996. The implementation of the City of Salinas General Plan may conflict with the Greater Salinas Area Plan, resulting in a significant impact.

To minimize and mitigate the potential impacts, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) presented Mitigation Measure LU2, which requires the City to be consistent with a portion of Draft Policy LU 3.4 of the Monterey County Draft General Plan, and to cooperate with LAFCO and the County of Monterey to direct growth outside the City limits to the Future Growth Area, on lands that are served or are planned to be served, with a full range of urban services, such as public water and sewer, an extensive road network, public transit, safety and emergency response services, parks, trails, and open space. The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) concluded that with the implementation of this mitigation measure, the impact would be reduced to a less than significant level.

Subsequently, *the Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that impacts associated with the FGAs, which include the CASP, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002). The City certified this EIR and approved annexation of the North of Boronda Future Growth Area, which includes the CASP.

The CASP as approved is consistent with the Greater Salinas Area Plan. All development under the CASP would be required to comply with the above-referenced regulations, policies, and standards. Implementation of the CASP and supporting tentative subdivision maps would not result in any new significant adverse impacts

beyond those addressed in *the Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). The CASP EIR utilized the earlier analysis of this topic provided in *the Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and Final Supplemental for the Salinas General Plan Final Program EIR (EDAW/AECOM 2007) pursuant to the tiering requirements of CEQA.

Greater Salinas Area Memorandum of Understanding (GSA-MOU): The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) noted that implementation of General Plan will result in the eventual annexation of additional land to the City in order to accommodate future growth, and that annexed land will be converted from agricultural use to urban use.

To minimize and mitigate the potential impacts, the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) presented the following two mitigation measures: Mitigation Measure LU5 requires the City to continue to cooperate with the County of Monterey to implement the GSA-MOU, which directs that City growth generally to the north and east away from the most productive farmland; and Mitigation Measure LU6 requires the City to encourage City-centered growth and give priority to redevelopment and infill projects that reduce development pressure on agricultural lands. The City will also establish an incentive program to promote these projects, such as priority permit processing and density bonuses for such developments. The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) concluded that with the implementation of this mitigation measure, the impact would be reduced to a less than significant level.

Subsequently, the *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007) indicated that impacts associated with the FGAs, which include the Specific Plan Area, would not be different from those discussed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002). The City certified this EIR and approved annexation of the North of Boronda FGA, which includes the CASP.

The project as proposed is consistent with the GSA-MOU. All development under the CASP and the proposed tentative subdivision map would be required to comply with the above-referenced regulations, policies, and standards. Implementation of the CASP and the proposed project would not result in any new significant adverse impacts beyond those addressed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) and *Final Supplemental for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). As stated above, the Final EIR identified no impacts or mitigation measures to be considered for Planning. This topic will be addressed in a section of the EIR that focuses on topics that have a tiered analysis.

Responses c): The Specific Plan Area is not within an area governed by an adopted

habitat conservation plan or natural community conservation plan; therefore, there are no conflicts with a habitat conservation plan or natural community conservation plan. Implementation of the proposed project would have no impact relative to this environmental topic.

Applicable Mitigation from Prior EIR (if any)

No mitigation is required. The General Mitigation Measures discussed above imposed duties on the City of Salinas, and not on individual property owners within the CASP.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable.

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
14. POPULATION AND HOUSING. *Would the project:*					
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly *(for example, through extension of roads or other infrastructure)*?	☐	☐	☐	☒	☐
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒	☐

Discussion

Overall conclusion: The CASP EIR provides project-level detail with respect to the proposed tentative subdivision map's effects on population and housing. The tentative

map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the impacts of the proposed tentative subdivision map related to population and housing.

Response a): Population and Housing is discussed on pages 3.8-1 to 3.8-21 of the Draft EIR. As the CASP Draft EIR explained on Page 1.0-19 of the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002), it is anticipated that Specific Plan Area will have approximately 11,635 residents at project build-out (City of Salinas 2013). This level of development is consistent with the expected intensity of development within the Specific Plan Area under General Plan buildout conditions as analyzed in the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002).

Impact 3.8-1 of the Draft EIR: The proposed Project has the potential to induce unplanned substantial population growth in an area (Less than Significant)

BACKGROUND

Section 15126.2(d) of the CEQA Guidelines requires that an EIR evaluate the growth-inducing impacts of a proposed action. A growth-inducing impact is defined by the CEQA Guidelines as:

> *The way in which a proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth…It is not assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.*

Based on the CEQA Guidelines, growth inducement refers to any growth that exceeds planned growth of an area and results in new development that would not have taken place without implementation of the project. A project can have direct and/or indirect growth inducement potential. Direct growth inducement would result if a project, for example, involved construction of new housing. A project would have indirect growth inducement potential if it established substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it would involve a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand (*Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342). Similarly, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. A project providing an increased water supply or wastewater treatment/collection in an area where this service historically limited growth could be considered growth-inducing.

The CEQA Guidelines further explain that the environmental effects of induced growth are considered indirect impacts of the proposed action. These indirect impacts or secondary effects of growth may result in significant, adverse environmental impacts. Potential secondary effects of growth include increased demand on other community and public services and infrastructure, increased traffic and noise, and adverse environmental impacts such as degradation of air and water quality, degradation or loss of plant and animal habitat, and conversion of agricultural and open space land to developed uses.

Growth inducement may constitute an adverse impact if the growth is not consistent with or accommodated by the land use plans, growth management plans and policies for the area affected. Local land use plans provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by adequate urban public services, such as water supply, roadway infrastructure, sewer service, and solid waste service.

Components of Growth: The timing, magnitude, and location of land development and population growth in a region are based on various interrelated land use and economic variables. Key variables include regional economic trends, market demand for residential and non-residential uses, land availability and cost, the availability and quality of transportation facilities and public services, proximity to employment centers, the supply and cost of housing, and regulatory policies or conditions. Since the general plan of a community defines the location, type, and intensity of growth, it is the primary means of regulating development and growth in California.

GROWTH EFFECTS OF THE PROPOSED PROJECT

Direct Population Growth: The Central Area Specific Plan authorizes development on the approximately 760-acre Specific Plan Area, including housing units that would result in direct population growth. The CASP could include up to 3,911 total residential units. The addition of up to 3,911 housing units at full buildout has the potential to increase the population of the city by an estimated 14,353 persons (based on a persons per dwelling unit factor of 3.67, in accordance with the Salinas General Plan and Section 31-802 of the City Subdivision Ordinance).

The Salinas General Plan (2002) and General Plan Program EIR analyzed impacts to population and housing and found that future development resulting from implementation of the General Plan had the potential to result in a significant, but mitigable impact related to substantial population and housing unit growth over existing conditions.

The 2002 General Plan identifies growth within the FGAs. The Salinas General Plan Land Use Table LU-3 of the Draft EIR identifies the development capacity of the FGAs. This includes 15,873 residential units, resulting in an additional population of 58,253

within the city's FGAs. In addition to the West Area Specific Plan (adjacent to the Specific Plan Area), which was approved in December of 2019, includes 4,340 units with the potential to increase the population of the city by an estimated 16,101 persons, the proposed Central Area Specific Plan proposes a maximum of 3,911 residential units with the potential to increase the population of the city by an estimated 14,353 persons. This anticipated growth is within the projections identified in the Salinas General Plan.

Additionally, the General Plan identified FGAs as areas of the City where future urban development will be directed. FGAs were established as a part of the General Plan maps, and include the Specific Plan Area, as well as other nearby areas. The General Plan provides development guidance within the FGAs so that they are developed as urban neighborhoods using the principles of New Urbanism. The principles of new urbanist design are further detailed in the City's Municipal Code Chapter 37 Zoning. Prior to approval of the CASP, the Specific Plan Area was previously designated New Urbanism Interim (NI) by the City's zoning map. The purpose of the NI zoning district was to provide a transitional zone for the FGAs of the City located north of East Boronda Road (including the Specific Plan Area) that are within the City limits and were or remain subject to the preparation of specific plans and subsequent subdivision maps.

The New Urbanism Districts promote the principles of New Urbanism and the creation of distinct identifiable neighborhoods that have Traditional Neighborhood Development (TND) characteristics as expressed in the Salinas General Plan and are intended to guide the development of the North of Boronda FGA. The FGA is also subject to a Specific Plan Overlay district. The Overlay requires that a Specific Plan be approved by the City prior to the development of any land located in the FGA. As such, the approved Specific Plan will regulate the development in the FGA.

As previously indicated, the Specific Plan Area was formerly zoned New Urbanism Interim (NI) with a Specific Plan Overlay district. In conjunction with the approval of the Central Area Specific Plan, the Specific Plan Area now includes the following zoning districts and General Plan Land Use Designations.

New Zoning Districts	**General Plan Land Use Designations**
Neighborhood Edge (NE) A	Low Density Residential
Neighborhood Edge (NE) B	Low Density Residential
Neighborhood General (NG) A	Medium Density Residential
Neighborhood General (NG) B	Medium Density Residential
Neighborhood General (NG) C	Medium Density Residential/High Density Residential
Village Center (VC-A & VC-B)	Mixed Use and High Density Residential
Open Space (OS)	Open Space
Park (P)	Park
Public/ Semipublic (PS)	Public/Semipublic

*A Specific Plan Overlay District applies to each Zoning district.

The CASP development is within the development types and intensities identified in the General Plan and its associated Final Program EIR. The CASP does not change limits, amount, type, or intensity of development allowed in the Specific Plan Area beyond what was analyzed in the certified Final Environmental Impact Report for the General Plan and Supplemental EIR for the Salinas General Plan Final Program EIR (SCH#2007031055). While there will be new growth, no new or increased significant population and housing impacts beyond those identified and analyzed in the General Plan Final Program EIR would occur.

Indirect Population Growth: As described above, projects that include employment generating uses have the potential to result in indirect population growth through the creation of jobs or the extension of infrastructure into areas that were not previously served.

Implementation of the Central Area Specific Plan would provide job growth to the area and include a maximum of 489,700 square feet of total commercial space. The Salinas General Plan designates land uses to ensure a balance between new residential development and jobs-creating uses. The Sphere of Influence Amendment Area (inclusive of the Specific Plan Area) is planned for up to 9.023 million square feet of commercial/retail/mixed use, general industrial uses, and public/semi-public uses (Final Supplement for the Salinas General Plan Final Program EIR, 2007). The maximum 489,700 square feet of total commercial space developable by the CASP is within the development capacities stated in the Salinas General Plan.

It is anticipated that local employment would be increased to provide administrative, management, and retail services. The proposed project is expected to require both full-time and part-time employees. It is anticipated that the employment growth would be met both by existing residents and through the attraction of new residents. Data from U.S. Bureau of Labor Statistics (2019) indicates that the City has an unemployment rate of approximately 4.5%, as of November 2019, which is higher than the State and national averages at 3.9% and 3.5%, respectively (U.S. Bureau of Labor Statistics, 2018). Many of the newly created jobs are expected to be in the retail/commercial sector and would be opportunities well-suited for second wage earners in households, the younger workforce, and others, which generally depend on the local workforce. Due to the fact there is currently a surplus of unemployed workforce within the City, it is likely that current residents would fill the majority of new positions. Additional population growth induced by the creation of new businesses could be supported by the available housing within Salinas as well as new housing planned as part of the Central Area Specific Plan.

The construction of new developments within the Specific Plan Area would increase temporary construction jobs in the area. As buildout of the CASP is expected to occur gradually in response to market demand, construction related employment would be similarly dispersed over time. Local construction companies are likely to find ample pools of employable personnel in the Salinas area, based on the current and projected

employment trends. Due to the fact there is currently a surplus of unemployed workforce within the City, it is likely that area residents would fill the majority of these temporary construction positions.

CONCLUSION

Development of the North of Boronda FGA is a component of the City's planned long-term growth as identified in the General Plan. Infrastructure needed to support development within the Specific Plan Area and the remainder of the North of Boronda FGA, and the subsequent population, housing and employment increases expected through implementation of the Central Area Specific Plan has already been planned and evaluated at the General Plan level. Therefore, development of the Specific Plan Area will not induce growth in the Specific Plan Area or adjacent undeveloped parcels that has not already been accounted for in the General Plan and evaluated in the Final General Plan EIR for the General Plan and Supplemental EIR for the City of Salinas General Plan Final Program EIR (also herein Final General Plan EIR).

The Final General Plan EIR did, however, identify significant impacts to population and housing as a result of implementation of the General Plan; because the CASP and implementing tentative subdivision maps are consistent with the development assumed under the General Plan, the significant impacts to population/housing resulting from implementation of the project would be the same as those identified by the Final General Plan Program EIR. Mitigation measures were identified in the Final General Plan EIR that would reduce population and housing impacts created by implementing the General Plan, and these mitigation measures would continue to apply to implementation of the CASP. A summary of mitigation measure provided in the City of Salinas General Plan FEIR are described below:

- **PH1.** The City will implement Implementation Program HE-2, which requires the City to continue to work with the LAFCO to ensure that sufficient land, infrastructure, and services are available to support housing development.

- **PH2.** The City will implement Implementation Program LU-12, which requires the City to review the level of services and funding levels at budget time, adjusting when necessary to ensure that adequate levels of services are provided and facilities are maintained.

- **PH3.** The City will implement Implementation Program C-3, which requires the City to continue to update on an annual basis the Capital Improvement Plan to plan for and fund future improvements to the circulation system, as well as other public facilities, including improvements to the existing pedestrian and bicycle system, within the community.

- **PH4.** The City will implement Implementation Program COS-9, which requires the City to continue to cooperate with the County of Monterey to implement the

Boronda Memorandum of Understanding, which directs that City growth occur generally to the north and east from the most productive farmland.

- **PH5.** The City will implement Implementation Program COS-29, which requires the City to promote retrofit programs by the City to reduce energy usage and consequently reduce emissions from energy consumption. Encourage utility companies to provide informational literature about available retrofit programs at City offices, the Permit Center, and libraries.

- **PH6**. The City will implement Implementation Program CD-11, which requires the City to use the Smart Growth Network's Getting to Smart Growth: 100 Policies for Implementation (ICMA, 2002) or other similar policy manual, perform an "audit" of the City's Zoning and Subdivision Ordinances to identify potential impediments to the development of smart growth and traditional neighborhood development projects. Revise, adopt, and implement new standards and procedures as necessary to encourage smart growth and traditional neighborhood development in Salinas.

- **PH7.** The City will implement Implementation Program COS-23, which requires the City to continue to cooperate with the Monterey Bay Unified Air Pollution Control District to implement the most recent Air Quality Management plan to address regional motor vehicle emissions. In particular, coordinate with the District and AMBAG, providing technical assistance and demographic data when available, during the development of future population projections by AMBAG.

While the CASP would result in growth within the City, it is not anticipated to significantly induce growth beyond what is anticipated because growth in the Specific Plan Area has been accounted for the General Plan and subsequent General Plan EIR, and Supplemental EIR. Thus, implementation of the proposed project would have a ***less than significant*** impact relative to this topic.

Impact 3.8-2 of the Draft EIR: Cumulative impact on the potential to induce substantial population growth in an area (Less than Significant and Less than Cumulatively Considerable)

The cumulative context for a cumulative analysis can be defined by region, by political subdivision or by the geography. The cumulative setting for population and housing includes Monterey County. This area was chosen because it represents the area that is reasonably expected to be affected by population and housing changes generated by the proposed project. Monterey County was also the geographic area evaluated under the cumulative analysis contained within the Final General Plan EIR.

Continued development in Salinas and Monterey County will result in housing unit and population increases in the region. Future development according to the land uses

identified in the Salinas General Plan will result in a population growth of approximately 69,300 people in the City between the years of 2000 and buildout of the General Plan. Based on the growth projected to occur in the planning area, the Final General Plan EIR concluded a potentially significant impact associated with substantial growth is anticipated. However, the Final General Plan EIR concluded that implementation of the mitigation measures contained in the FEIR would reduce the population and housing impacts created by implementation of the General Plan to a less than significant level. Mitigation measures identified in the Final EIR would apply to the implementation of the CASP.

Development of the North of Boronda FGA is a component of the City's planned long-term growth as identified in the City's General Plan. Infrastructure needed to support development of the Specific Plan Area and the FGAs, and the subsequent population, housing and employment increases expected through implementation of the Central Area Specific Plan, have already been planned and evaluated. Additionally, all lands within the General Plan jurisdiction have been planned to accommodate growth within the City have been evaluated in the General Plan FEIR. The CASP does not change the intent, intensities, or densities of land uses identified within the General Plan; therefore, development of the Specific Plan Area will not induce growth in the Specific Plan Area, adjacent undeveloped parcels, or within the City that has not already been accounted for in the General Plan, and evaluated for environmental impacts by the City in the Final General Plan EIR.

The proposed project, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Monterey County), would not be expected to cause any significant cumulative impacts. The proposed project would not have cumulatively considerable impacts associated with population and housing. As such, implementation of the proposed project would have a ***less than significant*** and ***less than cumulatively considerable*** contribution to impacts to population and housing.

Response b: The *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002) noted that the General Plan would not result in the displacement of substantial numbers of existing housing units or persons since the majority of the FGA designated for future development consist of vacant, agricultural, or redevelopment of nonresidential land. Additionally, any individual units that require removal would be offset by the increase in housing by the development of approximately 18,397 dwelling units at General Plan buildout.

The CASP could potentially result in the removal of some existing houses within the Specific Plan Area; however, any individual units ultimately removed would be offset by the increase in housing by the development of up to approximately 3,911 additional dwelling units at Specific Plan buildout. As such, the proposed project would not displace substantial numbers of existing housing or people. Implementation of the proposed project would not result in any new significant adverse Population and

Housing impacts beyond those addressed in the in the Final Environmental Impact Report, Salinas General Plan (Cotton Bridges Associates 2002) and *Final Supplement for the Salinas General Plan Final Program EIR* (EDAW/AECOM 2007). This topic does not warrant additional analysis and will not be addressed further in the EIR.

Applicable Mitigation from Prior EIR (if any)

No mitigation is required. The General Mitigation Measures discussed above imposed duties on the City of Salinas, and not on individual property owners within the CASP.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable.

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
15. PUBLIC SERVICES. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*					
(a) Fire protection?	☐	☐	☐	☒	☐
(b) Police protection?	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
(c) Schools?	☐	☐	☐	☒	☐
(d) Parks?	☐	☐	☐	☒	☐
(e) Other public facilities?	☐	☐	☐	☒	☐

Discussion

Overall conclusion: The CASP EIR provides project-level detail with respect to the proposed tentative subdivision map's effects on public services, in part due to the mitigation measures required to reduce some of these effects. The tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the proposed tentative subdivision map's effects on public services.

Responses 15) a-e): As the CASP Draft EIR explained on Pages 3.9-1 to 3.9-28, implementation of the proposed project would result in increased demand for police and fire protection in the Specific Plan Area. The project may also increase demand for local schools, parks and other public facilities. It has been determined that the potential impacts from increased demands on public services caused by the proposed project will require a detailed analysis in the EIR. As such, the lead agency will examine each of the five environmental issues listed in the checklist above in the EIR and will decide whether the proposed project has the potential to have a significant physical impact associated the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts to public services. A detailed analysis with adequate mitigation measures was prepared in the EIR. This analysis included the examination of public facilities impact fees as well as police, library and park fees.

Impact 3.9-1 of the Draft EIR: The proposed project may require the construction of fire department facilities which may cause substantial adverse physical environmental impacts (Significant and Unavoidable) (see Mitigation Measure 3.9-1 below).

The SFD protects life, property and the environment from the hazards of fire, explosion and hazardous materials incidents, and provides Advanced Life Support emergency medical services to City residents, businesses, and visitors. These services are provided 24-hours per day from six fire stations strategically located throughout the City of Salinas. General Plan Table LU-4 includes a service standard that calls for fire protection facilities necessary to provide a 6-minute response from receipt of a 911 call for arrival of first company 90% of the time.

The SFD service area includes the entire area within the existing political boundaries of the City of Salinas and the future growth areas. The Fire Department also provides contractual fire services to approximately 31 square miles of Monterey County Regional Fire Protection District (MCRFPD) surrounding the city. As noted above, fire protection service level is generally defined in terms of the timely arrival of a sufficient number of appropriately trained personnel and equipment necessary to stabilize and mitigate various types of emergencies. This is accomplished through a deployment plan that strives to meet an initial response service level (6 minutes or less, 90% of the time).

The project area is currently served by Station 5 located at 1400 Rider Avenue. Station 5 houses a Type 1 Engine, a Ladder Truck, a Type 3 Wildland Engine, and the Type 1 Haz-Mat vehicle. The construction was funded with Measure G funds and has been operational since 2017. There are seven personnel at this station. The Engine has one Captain, one Engineer, and one Firefighter. The Ladder Truck has one Captain, one Engineer and two Firefighters. For both of these apparatus, one crew member will also be a paramedic.

In order to maintain the General Plan's six-minute or less first response service standard, one to two fire station facilities and an engine company will be required within the North of Boronda Future Growth Area (FGA). One new station is required within the proposed Central Area Specific Plan Area of the North of Boronda FGA to accommodate the buildout of the West Area Specific Plan and the Central Area Specific Plan. A second station would be required in the eastern portion of the FGA to serve the proposed East Area Specific Plan Area. No application has been submitted to the City for the East Area Specific Plan to date. The new station in the Central Area Specific Plan, or temporary facilities agreed upon by SFD is to be available before new residential development occurs outside of the existing 6-minute response area. An approximately 2.0-acre site for the new fire station has been identified within the Specific Plan Area at the Northeast corner of Natividad Road and the Southerly Greenway Street.

Physical impacts from construction of a new fire facility within the Specific Plan Area are addressed in relevant environmental topics included in the Draft EIR, such as: air quality (Section 3.1), biological resources (Section 3.2), cultural resources (Section 3.3), greenhouse gas emissions and climate change (Section 3.4), hazards and hazardous materials (Section 3.5), hydrology and water quality (Section 3.6), noise (Section 3.7) population (Section 3.8), public services (Section 3.9), transportation (Section 3.10), and utilities (Section 3.11). A detailed discussion of relevant operational and construction impacts can be found in each respective section of the CASP EIR. Furthermore, additional site-specific environmental analysis would be required for each station prior to approval of a design for the facility and would consider any site-specific impacts unknown at this time. For the purposes on this report, however, it is assumed that the entire site would be disturbed, resulting in physical impacts of the entire site associated with the conversion of currently undeveloped farmland uses to developed uses, each of which are identified in relevant sections of the Draft EIR as noted above.

As described in Section 2.0, Project Description, of the CASP EIR, the proposed land use mix in the Central Area Specific Plan would result in the addition of up to 3,911 new residential units and 14,353 residents at project build-out (based on 3.67 persons per dwelling unit, in accordance with the Salinas General Plan and Section 31-802 of the City Subdivision Ordinance). The CASP also includes a business component that identifies approximately 489,700 square feet of commercial uses that would also require fire services.

The proposed Specific Plan would create a need for new or expanded fire protection facilities that could result in offsite physical impacts on the environment. Any future development under the approved General Plan, which includes all development within the North of Boronda FGA, is required to comply with regulations, policies, and standards included in the General Plan, Final Environmental Impact Report, Salinas General Plan (City of Salinas, 2002), and Final Supplement for the Salinas General Plan Final Program EIR (City of Salinas, 2007). Additionally, impact fees will recover future development's proportionate share of Fire Department capital asset costs. The City collects impact fees from new development based upon projected impacts from the development, for purposes of mitigating for project impacts on public facilities, including fire protection facilities. The City also reviews the adequacy of impact fees on an annual basis to ensure that the fee is commensurate with anticipated future facilities demands, assessed on a fair share basis for new development.

Project implementation would result in the need for the construction of new fire facilities, which has the potential to cause substantial adverse physical environmental impacts. Potential environmental impacts associated with the future construction of fire facilities within the Specific Plan Area are addressed throughout the CASP EIR. The CASP EIR analyzes the physical environmental effects that may occur as a result of development and introduction of new urban land uses within the Specific Plan Area. Future stations, if constructed, would fall within the footprint of the Specific Plan Area and would fall within the range of environmental impacts disclosed in the CASP EIR. Such construction of a

fire facility would be subject to all relevant mitigation measures included in the CASP EIR. It is noted, however, that development of a fire facility within the Specific Plan Area would contribute to identified significant and unavoidable impacts related to air quality (Impacts 3.1-2, and 3.1-7), biological resources (Impacts 3.2-2, 3.2-9 and 3.2-12), greenhouse gases (Impacts 3.4-1 and 3.4-4), noise (Impacts 3.7-1, and 3.7-8), and transportation and circulation (Impacts 3.10-3, and 3.10- 4).

CONCLUSION

The proposed project would require the construction of fire department facilities, which may cause substantial adverse physical environmental impacts. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the project and/or as specified in the Development Agreement for the CASP. These revenue sources would ensure the provision of adequate fire services to project residents. Consistent with the analysis included in this Draft EIR, however, the environmental impacts related to constructing new fire facilities to serve the proposed Project are considered **significant and unavoidable**.

Impact 3.9-2 of the Draft EIR: The proposed project may result in, or have the potential to require the construction of police department facilities which may cause substantial adverse physical environmental impacts (Less than Significant)

The current service ratio for the City of Salinas Police Department is 1.00 officers per 1,088 people (148 sworn officers/161,042 people), as identified by the Police Department. As described in Section 2.0: Project Description of the Draft EIR, the Specific Plan land use mix would result in the addition of up to 3,911 new residential units and 14,353 residents. The CASP also includes a business component that identifies approximately 489,700 square feet of commercial uses that would also require police services.

To keep current staffing levels throughout the City, the CASP would require an additional 13 sworn officers according to the current service standard; It is of note that the service ratio from 2000 through 2012 averaged 1.21 Police Officers per 1,000 population.1 Staffing levels are determined by the City on an annual basis. The addition of 14,353 residents would require an additional 17 sworn officers, based upon the 1.21 officers per capita standard.

Police service is evaluated and addressed annually on a citywide basis by the Salinas City Council, City Manager and Police Chief. The City Council adopts an annual budget allocating resources to police services, which effectively establishes the service ratio for that particular year. The annual budget is based on an assessment of community needs and available resources as determined by the City Council, City Manager, and the Police Chief. The City of Salinas Police Department (Department) operates out of a single station located at 312 East Alisal Street.

CONCLUSION

The proposed project would not result in, or have the potential to require the construction of police department facilities which may cause substantial adverse physical environmental impacts. Development of the Specific Plan Area did not directly trigger the need for a new facility; however, additional staffing and patrols are required to serve the proposed Specific Pan Area. The City collects impact fees from new development based upon projected impacts from the development. The City also reviews the adequacy of impact fees on an annual basis to ensure that the fee is commensurate with anticipated future facilities demands, assessed on a fair share basis for new development. Payment of the applicable impact fees by the project applicant as required by Mitigation Measure 3.9-1, and ongoing revenues that would come from, property taxes, sales taxes, and other revenues generated by the project. These revenue sources would ensure the provision of adequate police services to project residents. Because no physical construction is needed to provide such services, the environmental impacts related to providing such police services are ***less than significant***.

Impact 3.9-3 of the Draft EIR: Project implementation may result in the need for the construction of new schools, which has the potential to cause substantial adverse physical environmental impacts (Significant and Unavoidable)

As described in Section 2.0 (Project Description) of the Draft EIR, the Specific Plan land use mix would result in the addition of up to 3,911 new residential units and 14,353 residents at project build-out. The 3,911 new residential units and increased population of 14,353 people would result in the introduction of additional students to the Salinas Union High School District (SUHSD) and the Alisal Union School District (AUSD). Table 3.9-10 of the Final EIR (showing revisions to the table as it appeared in the Draft EIR) provides a list of the most recent student generation rates provided by these two school districts.

As shown in the revised version of Table 3.9-11 of the Draft EIR, the Final EIR calculated that the CASP could generate up to approximately 3,178 additional students. This value was very conservative, however, since the projection was based on the use of the highest student generation factors of all the three school districts then under consideration for each grade cohort (as described in the tables notes under Table 3.9-11 of the Final EIR) – SUHSD, AUSD, and the Santa Rita Union School District (SRUSD).

It should be noted that, at the time the Final EIR was published, a district boundary change between the AUSD and the SRUSD was underway. When the change was subsequently completed, SRUSD no longer had territory within the CASP Area and the AUSD took over territory formerly subject to SRUSD jurisdiction. In anticipation of this possible outcome, the Draft and Final EIRs included two separate tables showing

anticipated student enrollment/generation. The first (Table 3.9-11) reflects the student generation in the event the district boundary adjustment did *not* occur. The second (Table 3.9-12) reflected the student generation in the event the district boundary change *did* occur. This second table became the one that reflected circumstances as they actually subsequently occurred with the boundary change. Like Tables 3.9-10 and 3.9-11, Table 3.9-12 was updated in the Final EIR.

Because the AUSD-SRUSD boundary change went through, the figure of up to 3,178 students generated in the CASP proved to be substantially too high. As shown in the revised version of Table 3.9-12 found in the Final EIR, the CASP under that scenario is projected to generate only approximately 2,025 students. In this this scenario, only two school districts (instead of three) would serve the Specific Plan Area, and the Final EIR used the student generation factors for the two school districts remaining to serve the Specific Plan Area (AUSD and SUHSD). SRUSD generation rates were excluded.

It is also important to understand that special legal principles apply to impacts to school facilities. According to Government Code Section 65996, the development fees authorized by Senate Bill 50 (1998) (described earlier in the Draft EIR) are deemed to be "full and complete school facilities mitigation" for impact caused by new development. The Development allowed under the Specific Plan would be required pay all applicable school impact fees in effect upon the time of or prior to the issuance of building permits.

The legislation also recognized the need for the fee to be adjusted periodically to keep pace with inflation. The legislation indicated that in January 2000, and every two years thereafter, the State Allocation Board would increase the maximum fees according to the adjustment for inflation in the statewide index for school construction. However, even where applicants have agreed to pay school impact mitigation fees, if the proposed development requires the construction or expansion of additional facilities that would cause other physical environmental impacts, then those physical impacts to non-school resources may be analyzed under CEQA (Gov. Code § 65995(i)).

As approved, the CASP includes land identified for the construction of the following school facilities:

- One (or Two) K - 6th grade elementary school, within the Alisal Union School District. The new elementary school would be expected to serve students residing in the Specific Plan Area and adjacent areas. Attendance areas will ultimately be adopted by the Board of Trustees.

- One 7th – 8th grade middle school within the Salinas Union High School District. The middle school is expected to serve students both within and outside of the Specific Plan Area. Attendance areas will ultimately be adopted by the Board of Trustees. Additionally, high school students would be expected to addend SUHSD high school facilities in the neighboring West Area Specific

Plan area. Attendance areas will ultimately be adopted by the Board of Trustees. The school site is currently owned by the SUHSD.•

It is noted that the CASP development team met with AUSD and School Site Solutions (a consultant) regarding student generation and school facility needs within the Plan Area dating back to approximately 2006. Between the beginning of this consultation effort and present day, the overall layout of the Land Use Plan, including the number of, and location of school facilities, has not changed much.

The environmental review and permitting responsibilities for development of any of the above-mentioned new school facilities, or any additional facility not identified in the CASP, will lie with the relevant school district(s). There are specific applicable CEQA requirements governing school districts' duties as CEQA lead agencies. (See Pub. Resources Code, § 21151.8.) Under this statute and others found in the Education Code, school districts have the authority to evaluate property that they may desire for a School facility, and to acquire that property at their discretion. Here, the City of Salinas would serve as a responsible agency under CEQA, in a capacity whereby the City would provide municipal services (i.e. sewer, water, storm drainage, police, fire, etc.) to service the School facility. School district boards have relatively broad discretion as to where to site new school facilities. By a two-thirds majority vote, such a board "may render a city or county zoning ordinance inapplicable to a proposed use of property by the school district[,]" though such action may not be taken "when the proposed use of the property by the school district is for nonclassroom facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings." (Gov. Code, § 53094.)

In approving the CASP, the City committed to consulting with AUSD and SUHSD as part of the City's process for considering proposed tentative subdivision maps within the Specific Plan area. Such consultations allow the City to keep the school districts apprised of the landowners' progress in seeking and obtaining entitlements for incremental amounts of new development within the Plan Area, thereby helping the Districts to keep pace with new residential development as it occurs. Over time, as the Plan Area gradually builds out, the Districts might reassess their needs or consider new or different sites for their proposed facilities, depending on factors such as the number of potential students living within newly developed areas and the number of additional students projected to live within the Plan Area at buildout. These tentative map consultations, then, will provide a kind of development phasing that will allow the Districts to proactively plan for obtaining the sites and construction funds they will need to allow for the timely construction of new schools as the demands for them materialize over time.

Physical impacts from construction of the planned school sites within the Specific Plan Area would be related to relevant environmental topics included in the Draft EIR, such as: air quality (Section 3.1), biological resources (Section 3.2), cultural resources (Section 3.3), greenhouse gas emissions and climate change (Section 3.4), hazards

and hazardous materials (Section 3.5), hydrology and water quality (Section 3.6), noise (Section 3.7) population (Section 3.8), public services (Section 3.9), transportation (Section 3.10), and utilities (Section 3.11). A detailed discussion of relevant operational and construction impacts is found in each respective section of the CASP EIR. Furthermore, as explained above, site-specific environmental review would be required for each school by each school district prior to approval of a design for the facility and would consider any site-specific impacts unknown at this time.

The placement of new school sites within new growth areas is a common land use planning exercise to try to ensure that new students have school facilities proximate to their homes. In helping to formulate and process the proposed Central Area Specific Plan, the City and the area landowners worked with the affected School Districts to ensure that there is adequate land set aside for the development of new school facilities within the Specific Plan Area. That planning effort by the City resulted in the new school sites that are within the Specific Plan Area, as well as other schools in other parts of the Future Growth Area that are outside the Specific Plan Area.

To date, neither AUSD nor SUHSD has notified the City of any specific alternative facility development plans, boundary changes, or proposed bussing plans that would be needed to educate future students living in the CASP in the event that new schools are not funded and constructed within the CASP boundaries. In recent litigation against the City (*Alisal Union School Dist. v. City of Salinas* [Monterey County Superior Court Case No. Case No. 20CV003402]), AUSD generally contended some such new facilities or other AUSD response strategies might be needed, but offered no specifics. As described by AUSD's legal counsel in a brief filed during the litigation, AUSD's comments on the Draft EIR for the CASP "contained a detailed description of the school funding apparatus in California, and demonstrated that due the high improbability of obtaining sufficient funding, AUSD would not be able to construct the three new educational facilities assumed by the FEIR. [Citation.] As a result, the Districts 'will be forced to consider other means of serving the students who will reside there,' including 'massive bussing and other transportation to existing District sites, as well as overcrowding of those sites.' [Citation.] Therefore, the City was fully on notice of the significant environmental impacts related to an influx of students on the existing school facilities, which CEQA required the City to address." (Petitioners' Opening Brief in Support of First Amended Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief [Monterey County Superior Court Case No. 20CV003402], p. 13.)

At the parties' request, however, the Monterey County Superior Court ultimately rejected this line of argument, finding that "[b]ased upon *Santa Rita Union School District v. City of Salinas* (2023) 94 Cal.App.5th 298, the Court denies the CEQA Cause of Action in the First Amended Petition and enters Judgment in favor of the City on all Causes of Action. Based upon this conclusion and the denial of the other causes of action in the First Amended Petition, judgment is hereby entered in favor of the City and against the District." (Stipulated Judgment Denying First Amended Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief, p. 7.)

The *Santa Rita Union* court decision cited by the superior court refers to the final Court of Appeal opinion in separate but very similar litigation filed by SRUSD against the City over the City's 2019 approval of the West Area Specific Plan (WASP). (See *Santa Rita Union School Dist. v. City of Salinas* [Monterey County Superior Court Case No. Case No. 20CV000242].) In that case, SRUSD made legal arguments under CEQA very similar to those put forward by AUSD against the CASP. In that appellate decision, the Court of Appeal reasoned as follows in upholding the EIR for the WASP:

> we conclude that based on the non-specific, uncertain, and vague nature and quality of the information provided by the Districts, in the context of a land-use and long-range planning document like the Specific Plan, the Final EIR for the Specific Plan and the City's responses to the Districts' comments were adequate under CEQA. This is especially true when the generally identified potential indirect and off-site impacts related to existing school facilities were impacts that might flow and could be identified only from later decisions by the Districts themselves, which impacts may call for later project-level environmental review by the Districts, not the City. The City was not required to "dimly guess" about potential impacts based on uncertain and non-specific information and many unknowns. [Citation.] To the extent the City reached the conclusion that the Districts' comments were speculative, noted the conclusion, and terminated the discussion, the City complied with Guidelines section 15145 concerning speculation and section 15088 on responses to comments. (See, Guidelines, § 15088, subds. (a) & (c) [lead agency must respond to comments on "significant environmental issues" in good faith, giving detailed reasons why specific comments and suggestions were not accepted but level of detail may correspond with level of detail provided in comment; responses to general comments may be general].) Given the non-specificity of the comments and the extent to which information about decisions the Districts might make in the future to accommodate additional students if new schools were not built, and any related environmental impacts resulting from those future decisions, was not yet known, additional discussion, analysis, or response by the City could not possibly be meaningful in the sense CEQA intends and requires to serve its informational and decision-making purposes.
>
> (94 Cal.App.5th at p. 349.)

As noted above, the City is currently unaware of any *specific* alternative facility development plans, boundary changes, or proposed bussing plans that AUSD could claim that it needs to pursue in lieu of, or beyond, the construction and operation of new new schools within the CASP boundaries. Notably, the CEQA Guidelines provide categorical exemptions for (i) minor alterations in existing public facilities, (ii) the construction and location of limited numbers of new, small facilities or structures, (iii)

minor alterations to land, (iv) construction or placement of minor structures accessory to (appurtenant to) existing institutional facilities, (iv) minor additions to existing schools (including portable classrooms) within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less, and (v) infill development in cities on sites of five acres or smaller and meeting certain requirements. (CEQA Guidelines, §§ 15301, 15303, 15304, 15311, and 15314.) These exemptions are available to AUSD in the event that, in the future, it may feel the need to make physical modifications or additions to any of its existing facilities.

Notably, in the litigation filed by AUSD against the City over the CASP, the City obtained, and submitted to the superior court, expert evidence indicating a downward trend in AUSD enrollment numbers. This evidence not only suggested that AUSD would not need to build new student capacity outside the boundaries of the CASP in lieu of new schools within the CASP, but that AUSD could absorb the full anticipated CASP student population within its existing facilities. In a document entitled, *Central Area Specific Plan, Analysis of School Enrollments, Capacity, and Capital Funding in Alisal Union School District* (Oct. 24, 2022), expert Olga Bevz of JCJ Partners reached conclusions that she summarized in a sworn declaration as follows:

> Petitioners' Opening Brief contains the statement that, "*[h]ere, neither the DEIR nor the FEIR for the CASP adequately informed the public that due to the high probability of a lack of sufficient funding to build new schools, there will be significant environmental impacts ... due to the inevitable need to modify the Districts' facilities to accommodate the influx of students.*" (POB, p. 11:22-25.) This statement is unsubstantiated, inaccurate, misleading, and untrue for the following reasons:
>
> a. Demographic trends and existing available school capacity in AUSD show that AUSD has experienced declining enrollment since the 2015-2016 school year, and will continue to experience declining enrollment. The decrease in enrollment will accommodate the projected 1,384 students from the CASP in existing facilities without modifications, as described in detail in the attached JCJ Partners Analysis. I draw this conclusion based on the following facts:
>
> (i) AUSD enrolled 7,851 students in the 2021-2022 school year. Enrollment has declined by 1,431 students from the peak of 9,282 total students in 2015-2016.
>
> (ii) The number of births in the zip codes served by the AUSD has declined by 18.6% from 2010 to 2020, a larger decrease than in Monterey County overall (-17.2%) and in statewide births (-17.6%) over the same period.

> (iii) A decline in births leads to lower incoming preschool and kindergarten classes in 4 to 5 years, increasing districtwide decline over time.
>
> Based on these facts, the AUSD enrollment decline is expected to continue in the coming years.
>
> ***
>
> AUSD claims that "*it is undisputed that there were potentially significant environmental impacts related to the need of the Districts to modify their existing facilities that went unanalyzed in the FEIR, and intentionally so.*" (POB, p. 13:3-5.) This statement is unsubstantiated, inaccurate, misleading, and untrue because, as outlined above and shown in Charts 6 and 7 of the JCJ Partners Analysis, and supported by long-term projections through buildout of the CASP in Exhibit D of the same analysis, existing available school capacity will continue to exceed enrollment districtwide and at the nearest schools even with the addition of CASP students and the complete Transitional Kindergarten. No modification of campuses specific to CASP students is required.
>
> (Declaration of Olga Bevz in Support of Respondents' Opposition to First Amended Petition for Peremptory Writ of Mandate and Complaint for Declaratory and Injunctive Relief, pp. 7, 8-9, original italics.)

In sum, the City is unaware of any need or legal obligation to consider steps that AUSD might need to take to address the need to educate future school children that might live in areas affected by the proposed project.

CONCLUSION

Potential environmental impacts associated with the future construction of schools within the Specific Plan Area are addressed throughout the EIR. The CASP EIR analyzes the physical environmental effects that may occur as a result of development and introduction of new urban land uses within the Specific Plan Area. Each future school, if constructed, would fall within the range of environmental impacts disclosed in the CASP EIR, and would be subject to relevant mitigation measures included in the Draft EIR. It is noted, however, that development of a school within the Specific Plan Area would contribute to significant and unavoidable impacts related to air quality (Impacts 3.1-2, and 3.1-7), biological resources (Impacts 3.2-2, 3.2-9 and 3.2-12), greenhouse gases (Impacts 3.4-1 and 3.4-4), noise (Impacts 3.7-1, and 3.7-8), and transportation and circulation (Impacts 3.10-3, and 3.10-4). Therefore, consistent with the analysis included in this Draft EIR, impacts related to constructing new school facilities to serve the proposed Project are considered ***significant and unavoidable (see Mitigation Measure 3.9-2 below)***.

Impact 3.9-4 of the Draft EIR: Project implementation may result in effects on parks, or has the potential to require the construction of park facilities which may cause substantial adverse physical environmental impacts (Significant and Unavoidable)

The General Plan establishes a park dedication standard of three acres of parkland per 1,000 residents, which is consistent with the State Quimby Act. The CASP includes a total of approximately 148 net acres of land are dedicated to public parks and open space uses within the Specific Plan area. These areas are subject to the requirements of Article III, Divisions 6 and 7, of the Zoning Code respectively, except as otherwise provided for in the Specific Plan.

The diversity of park types and open space provides a full range of recreational areas and green spaces to be enjoyed by the Central Area residents and the surrounding community. See Figure 3.9-1 (Public Facilities) for the location of the proposed parks and open space areas. Approximately 148 net acres within the Specific Plan Area are dedicated to parks and open space uses. A total of 44.06 net acres of public parks are provided in the Specific Plan to meet the General Plan requirement of 3 acres of developed parkland per 1,000 residents. The public parks will consist of seven (7) neighborhood parks (more than 3.0 acres) with sport fields and tot lots and eighteen (18) small parks, many with ball courts and tot lots. Neighborhood Parks are 3 to 5+ acres in size, and small parks are one half to two acres in size. While the proposed project would increase the demand for parks and other recreational facilities based on the population growth, the amount of parkland and open space provided within the Specific Plan Area sufficiently meets the City's General Plan parkland requirements. No additional need for park space is required, and it is not anticipated that any substantial physical deterioration of existing facilities would occur or be accelerated.

CONCLUSION

Project implementation may result in effects on parks, or has the potential to require the construction of park facilities which may cause substantial adverse physical environmental impact. Potential environmental impacts associated with the future construction of park and other recreational facilities within the Specific Plan Area are addressed throughout the CASP EIR. The CASP EIR analyzes the physical environmental effects that may occur as a result of development and introduction of new urban land uses within the Specific Plan Area. Each future park, if constructed, would fall within the range of environmental impacts disclosed in the CASP EIR, and would be subject to relevant mitigation measures included in the CASP EIR.

It is noted, however, that development of park land within the Specific Plan Area would contribute to significant and unavoidable impacts related to air quality (Impacts 3.1-2, and 3.1-7), biological resources (Impacts 3.2-2, 3.2-9 and 3.2-12), greenhouse gases (Impacts 3.4-1 and 3.4-4), noise (Impacts 3.7-1, and 3.7-8), and transportation and circulation (Impacts 3.10-3, and 3.10-4). Therefore, consistent with the analysis included

in this Draft EIR, impacts related to constructing new park facilities to serve the proposed project are considered ***significant and unavoidable***.

Impact 3.9-5 of the Draft EIR: Project implementation may result in effects on other public facilities (Significant and Unavoidable)

The proposed project would increase demand for other public facilities within the City of Salinas, such as libraries, and community/recreation buildings. However, to mitigate increased demand on library and community facilities, the City collects public facilities impact fees from new development based upon projected impacts from the development. The City also reviews the adequacy of impact fees on an annual basis to ensure that the fee is commensurate with the service or facility.

The City has identified an approximately 2.0-acre site in the Central Area Specific Plan for a new branch library. Based on the 2-mile service area prescribed in the General Plan, the new branch library will also service significant areas of the existing City of Salinas, south of Boronda Road. The West Area Specific Plan will contribute its fair share to the acquisition of the site and the construction of the new branch library through the Public Facilities Impact Fee program.

The City also seeks to develop one or more recreation centers within the proposed neighborhood parks of the FGA. The precise location and configuration of recreation centers is yet to be determined by the City. The timing and phasing of construction of the recreation centers will be determined by the City concurrently with development of the FGA. The Specific Plan provides that the Central Area Specific Plan will contribute its fair share of the costs of construction of the recreation centers through the Public Facilities Impact Fee program.

CONCLUSION

Project implementation may result in effects on other public facilities. The Central Area Specific Plan would result in new demand for public facilities, including library facilities and recreational facilities. The Specific Plan does propose a library and potentially would include other public facility such as a community building within the Specific Plan Area; therefore, development of these facilities would have a direct physical impact on the environment. The Central Area Specific Plan would be responsible for paying the applicable impact fees, and ongoing revenues from the Specific Plan would be generated from property taxes, sales taxes, and other appropriate fees/payments. Such fees/payments would be the financial contribution for any new demand created by the Central Area Specific Plan as required by Mitigation Measure 3.9-1. However, development of public facilities within the Specific Plan Area would contribute to significant and unavoidable impacts related to air quality (Impacts 3.1-2, and 3.1-7), biological resources (Impacts 3.2-2, 3.2-9 and 3.2-12), greenhouse gases (Impacts 3.4-1 and 3.4-4), noise (Impacts 3.7-1, and 3.7-8), and transportation and circulation (Impacts 3.10-3, and 3.10-4) through the development of currently undeveloped sites.

Therefore, consistent with the analysis included in this Draft EIR, impacts related to constructing new facilities to serve the proposed project and surrounding areas are considered ***significant and unavoidable***.

Impact 3.9-6 of the Draft EIR: Under cumulative conditions the proposed project may result in the construction of public facilities, which may cause substantial adverse physical environmental impacts (Cumulatively Considerable and Significant and Unavoidable)

The cumulative setting would include all areas covered in the service areas of the City of Salinas Police Department, City of Salinas Fire Department, City of Salinas Recreation and Community Services Department, Salinas Union High School District, the Alisal Union School District, and the Salinas Public Library System. This geographic area was chosen because these service providers would be required to serve the proposed project and contains those service providers that have to potential to bear a cumulative impact from the proposed project, when the proposed project is considered together with all past, present, and probably future projects within these providers' service areas.

Under cumulative conditions future local and regional growth will result in increased demand for schools, police protection, fire protection, schools, parks/recreation, and library services. The City and its associated service providers must continue to evaluate the levels of service desired and the funding sources available to meet increases in demand.

The 2002 General Plan Final Program EIR analyzed impacts to public services (including police protection, fire and emergency services, schools, parks, and libraries), and found that General Plan policies addressed the public services needs of future development resulting from implementation of the General Plan. The specific environmental impact of constructing new facilities could not be determined at the time, but the Final Program EIR found that construction and operation of such facilities could potentially cause significant impacts. These potential impacts, however, were addressed and mitigated to the greatest extent feasible by the General Plan policies and mitigation measures included in Sections 5.1 through 5.12 of the Salinas General Plan Final Program EIR.

CONCLUSION

Under cumulative conditions the proposed project may result in the construction of public facilities, which may cause substantial adverse physical environmental impacts. The impact fees developed and reviewed by the City will recover future development's proportionate share of City-related capital asset costs. Fees, as applied only to new development, represent future development's proportionate share of public services and facilities capital costs.

However, while new development will avoid project level impacts associated with service ratios to the extent allowed by the associated impact fees, there are existing deficiencies with regard to library services that will need to be addressed by the City in order to meet service goals set forth by the General Plan. It is important to note that impact fees may not be used to correct existing deficiencies, but may be used to pay for increased demand for public facilities or increased demand upon existing capital facilities provided that those facilities are needed to serve additional development and have the capacity to do so, given relevant level-of-service standards.

It is also important to note that, in addressing public service demand issues under CEQA, the appropriate focus is on the environmental effects of whatever steps might be necessary to achieve or maintain adequate service. For example, if proposed new development would create an increased demand for law enforcement or fire protection services, an EIR should inquire as to whether new or expanded physical facilities may be required in order to provide such service. The "impacts" addressed under CEQA are the physical effects of providing service, not any possible failure to provide adequate service under applicable standards. (See *City of Hayward v. Board of Trustees of the Cal. State University* (2015) 242 Cal.App.4th 833, 843 ["[t]he need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate"]; *Goleta Union School Dist. v. Regents of Univ. of Cal.* (1995) 37 Cal.App.4th 1025, 1031– 1034 [school overcrowding attributable to new development is not an environmental effect subject to CEQA, though the physical effects of new facility construction to serve new students would be]; and CEQA Guidelines, § 15131, subd. (a) ["[e]conomic or social effects of a project shall not be treated as significant effects on the environment"].)

Moreover, it is critical to understand that special legal principles apply to impacts to school facilities. According to Government Code Section 65996, the development fees authorized by Senate Bill 50 (1998) (described earlier) are deemed to be "full and complete school facilities mitigation" for impact caused by new development. The legislation also recognized the need for the fee to be adjusted periodically to keep pace with inflation. The legislation indicated that in January 2000, and every two years thereafter, the State Allocation Board would increase the maximum fees according to the adjustment for inflation in the statewide index for school construction.

Section 65996 also prohibits public agencies from using CEQA or "any other provision of state or local law" to deny approval of "a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property or any change in governmental organization or reorganization" on the basis of the project's impacts on school facilities.

The construction and operation of future public facilities required to serve cumulative development (including the Central Area Specific Plan Area) could potentially cause significant impacts. Cumulative development including additional fire stations, parks, schools, library, and other public facilities within the city and service area would

contribute to significant and unavoidable cumulative impacts that have been identified within the CASP EIR related to: air quality (Impacts 3.1-2, and 3.1-7), biological resources (Impacts 3.2-2, 3.2-9 and 3.2-12), greenhouse gases (Impacts 3.4-1 and 3.4-4), noise (Impacts 3.7-1, and 3.7-8), and transportation and circulation (Impacts 3.10-3, and 3.10-4). Therefore, consistent with the analysis included in this Draft EIR, cumulative impacts related to the construction of public facilities needed to meet future demand are considered ***significant and unavoidable*** *and* ***cumulatively considerable***.

Applicable Mitigation from Prior EIR (if any)

Mitigation Measure 3.9-1: Prior to the issuance of a Certificate of Occupancy for each dwelling unit (and prior to issuance of building permits for non-residential uses), the applicant shall pay all applicable project impact fees per the impact fee schedule.

Mitigation Measure 3.9-2: Prior to the issuance of building permits for each dwelling unit, the applicant shall pay applicable school fees mandated by SB 50 to the Salinas Union High School District (SUHSD) and Alisal Union School District (AUSD).

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable.

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
16. RECREATION. *Would the project:*					
(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒	☐

Discussion

Responses a-b): As the CASP Draft EIR explained on Pages 1.0-19 and 1.0-20 of the *Final Environmental Impact Report, Salinas General Plan* (Cotton Bridges Associates 2002), the future residents and employees of the CASP are expected to increase demand for park and recreational facilities, some of which may increase the use of existing regional parks or other recreational facilities. However, much of the demand for park and recreational facilities will be met by the construction of new parks and recreational facilities within the boundary of the Specific Plan area. The new demand is not anticipated to cause substantial physical deterioration of existing facilities. The impacts from construction of new facilities will be analyzed within the context of each environmental topic of the Draft and Final EIR as part of the overall land use plan.

Applicable Mitigation from Prior EIR (if any)

Mitigation Measure 3.9-1: Prior to the issuance of a Certificate of Occupancy for each dwelling unit (and prior to issuance of building permits for non-residential uses), the applicant shall pay all applicable project impact fees per the impact fee schedule.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not Applicable

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
17. TRANSPORTATION. *Would the project:*					
(a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒	☐
(b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)?	☐	☐	☐	☒	☐
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒	☐
(d) Result in inadequate emergency access?	☐	☐	☐	☒	☐

Overall conclusion: The CASP EIR provides project-level detail with respect to the proposed tentative subdivision map's transportation-related effects. The tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the transportation-related impacts of the proposed tentative subdivision map. The CASP EIR devoted a lot of attention to the extent to which the then-proposed Specific Plan could adversely affect "level of service" (LOS), which ceased to be a recognized transportation effect under CEQA as of late 2018 and early 2019. LOS-related issues were addressed comprehensively through recommended conditions of approval in analysis that, strictly speaking, was not analysis under CEQA.

Responses a), b), c), and d): As the CASP Draft EIR explained on Pages 3.10-1 to 3.10-104, information in this section is derived primarily from *The Central Area Specific Plan* Draft *Transportation Impact Analysis* prepared by Fehr & Peers (2019), which is included as **Appendix I** in Volume II of the Draft EIR.

As the Draft EIR explained at length, although the document included detailed analysis of the effects of the CASP on LOS on area roadways, LOS had ceased to be a CEQA category of environmental impact by the time the Draft EIR was released (June 2020). (See Draft EIR, pp. 3.10-7 – 3.10-9.) For this reason, recommendations for maintaining acceptable LOS were styled as proposed conditions of approval rather than CEQA Mitigation Measures.

Impact 3.10-1: Under Existing Plus Project conditions, implementation of the proposed Specific Plan would conflict with the performance measures established by the City of Salinas, Monterey County, and Caltrans (Not Adverse with Recommended Conditions of Approval)

Implementation of the Specific Plan, without mitigating conditions of approval, results in unacceptable operation at five of the study intersections, and two of the U.S. 101 ramp junctions. All study segments of U.S. 101 performed within the County CMP standards. This would be a **potentially adverse** impact. The reductions in automobile LOS attributable to the Central Area Specific Plan include the following intersections:

- North Main Street/West Laurel Drive (#32): LOS E during the PM peak hour
- Natividad Road/East Laurel Drive (#33): LOS E during both peak hours
- North Sanborn Road/Boronda Road (#35): LOS F during both peak hours
- Sherwood Drive/Natividad Road/East Bernal Drive/La Posada Way (#38): LOS E during both peak hours
- South Sanborn Road/North Sanborn Road/John Street (#45): LOS E during the AM peak hour

In addition, the following ramp junctions would function below County CMP standards during the PM peak hour:

- U.S. 101 Northbound Boronda Road Off-Ramp: LOS E (35.1 passenger cars per vehicle per lane)
- U.S. 101 Northbound West Laurel Drive Off-Ramp: LOS E (35.6 passenger cars per vehicle per lane)

Because these potential impacts are attributable to the addition of project-generated traffic to existing volumes, development within the Central Area Specific Plan would generally be responsible for funding the required physical improvements needed to address congestion. Operation at all five of these intersections and both the aforementioned ramp junctions could be improved to acceptable levels of delay under Existing Plus Project conditions. With implementation of the recommended improvements described below, operation at all five of the affected intersections and both ramp junctions, as identified above, would be improved to acceptable levels:

- **North Main Street & West Laurel Drive (#32):** Optimize existing signal timings. This improvement was found to improve level of service to LOS D, with 48.6 seconds of delay during the evening peak hour. As this impact is a result of project traffic, the project applicant would be responsible for its funding and implementation at the project approval stage. With the implementation of the identified improvement, the impact would not be adverse. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design.

- **Natividad Road & East Laurel Drive (#33):** The proposed improvement is to widen the intersection to add additional northbound and southbound through lanes. This measure was found to improve the level of service to D, with 52.3 seconds of delay and 51.5 seconds of delay in the morning and evening peak periods, respectively. This improvement is part of the City's Traffic Improvement Program. As this impact is a result of project traffic, the project applicant shall be responsible for its funding and implementation at the project approval stage. With the implementation of the identified condition of approval, the impact would not be adverse.

- **North Sanborn Road/Boronda Road (#35):** Install a roundabout. The roundabout shall be of adequate size and configuration to adequately serve forecast traffic levels in accordance with City General Plan policies. As this impact is a result of project traffic, the project applicant shall be responsible for its funding and implementation at the project approval stage. With the implementation of the identified improvement, the impact would not be adverse.

- **Sherwood Drive/Natividad Road & East Bernal Drive/La Posada Way (#38):** Optimize existing signal timings and add an eastbound left turn pocket. The proposed improvement is to add an eastbound left turn pocket and optimize the existing signal timing to better accommodate the expected changes in traffic distribution and volume in the with-project scenario. The proposed improvement was found to improve LOS in the morning and evening peak periods to LOS B, with 15.7 seconds of delay and 15.3 seconds of delay, respectively. As this impact is a result of project traffic, the project applicant shall be responsible for its funding and implementation at the project approval stage. With the

implementation of the identified condition of approval, the impact would not be adverse.

- **South Sanborn/North Sanborn/John Street (#45):** Optimize signal timing. The optimization of the existing traffic signal timing and splits at this uncoordinated intersection would mitigate the identified impact. With the implementation of this proposed improvement, the operation of the intersection would improve to LOS C with 28.0 seconds of delay per vehicle during the morning peak hour. As this impact is a result of project traffic, the project applicant shall be responsible for its funding and implementation at the project approval stage. With the implementation of the identified improvement, the impact would not be adverse.

- **U.S 101 Ramp Junctions:** Contribution to the TAMC RDIF Program and payment of the City of Salinas's Traffic Impact Fees. The proposed payments for this impact are to contribute to the TAMC Regional Development Impact Fee (RDIF) Program and the City of Salinas's Traffic Impact Fee (TIF) Program. These programs include improvements to U.S. 101 that would improve mainline and ramp junction operations, which would reduce this project impact to a level that is not adverse.

CONCLUSION

Under Existing Plus Project conditions, implementation of the proposed Specific Plan would conflict with the performance measures established by the City of Salinas, Monterey County, and Caltrans. While the use of LOS within CEQA is no longer permitted, the City desires to manage congestion levels to maintain consistency with its General Plan and the County's General Plan. In accordance with these guidelines, conditions of approval are identified and recommended to manage congestion levels to those specified within the current General Plans. With implementation of these recommended conditions of approval, the impacts to the above five intersections and two ramp junctions are considered **not adverse**, and no further conditions of approval are required.

RECOMMENDED CONDITIONS OF APPROVAL

Recommended Condition of Approval 3.10-1: Each project applicant for development within the Specific Plan Area shall provide its fair-share funding for the optimization of existing signal timings at North Main Street/Laurel Drive, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the

use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design.

Recommended Condition of Approval 3.10-2: Each project applicant for development within the Specific Plan Area shall provide its fair-share funding for the widening of the intersection at Natividad Road/East Laurel Drive to add additional northbound and southbound through lanes, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). This improvement is part of the City's Traffic Improvement Program. Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

Recommended Condition of Approval 3.10-3: Each project applicant for development within the Specific Plan Area shall provide its fair-share funding for the installation of a roundabout at the intersection of North Sanborn Road/East Boronda Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

Recommended Condition of Approval 3.10-4: Each project applicant for development within the Specific Plan Area shall provide its fair-share funding for the optimization of existing signal timings and to add an eastbound left turn pocket at the intersection of Sherwood Drive/Natividad Road & East Bernal Drive/La Posada Way, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. This condition includes the addition of an eastbound left turn pocket and optimization of the existing signal timing to better accommodate the expected changes in traffic distribution and volume with implementation of the proposed project. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design.

Recommended Condition of Approval 3.10-5: Each project applicant for development within the Specific Plan Area shall provide its fair-share funding for the optimization of existing signal timings and splits at the South Sanborn/North Sanborn/John Street intersection, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for nonresidential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design.

Recommended Condition of Approval 3.10-6: Prior to the approval of final improvement plans for each tentative map, each project applicant for development within the Specific Plan Area shall contribute its fair-share funding to the Transportation Agency for Monterey County (TAMC) Regional Development Impact Fee (RDIF) Program and the City of Salinas' Traffic Impact Fee (TIF) Program, as determined by the TAMC and the City of Salinas, respectively, in proportion to the area planned for development by such project applicant. These programs include improvements to U.S. 101 that would improve mainline and ramp junction operations, which would mitigate the proposed project's impact to the U.S. 101 ramp junctions affected by the proposed project (i.e. the Northbound Boronda Road Off-Ramp and Northbound West Laurel Drive Off-Ramp.

Impact 3.10-2: Under Existing Plus Project and West Area Specific Plan conditions, implementation of the proposed Specific Plan may conflict with the performance measures established by the City of Salinas, Monterey County, and Caltrans (Not Adverse with Recommended Conditions of Approval)

Implementation of the Specific Plan would result in unacceptable operation at ten of the study intersections, and two of the U.S. 101 ramp junctions, under the Existing Plus Project and Central Area Specific Plan scenario. All study segments of U.S. 101 performed within the County CMP standards. This would be a **potentially adverse** impact.

The reductions in automobile LOS attributable to the Central Area Specific Plan plus West Area Specific Plan scenario include the following intersections:

- San Juan Grade Road/Van Buren Avenue (#14): LOS F during both peak hours
- North Main Street/Boronda Road (#17): LOS F during PM peak hour
- San Juan Grade Road/East Boronda Road (#19): LOS F during PM peak hour
- North Main Street/West Laurel Drive (#32): LOS E during PM peak hour
- Natividad Road/East Laurel Drive (#33): LOS F during both peak hours
- North Sanborn Road/Boronda Road (#35): LOS F during both peak hours
- Sherwood Drive/Natividad Road & East Bernal Drive/La Posada Way (#38): LOS F during both peak hours
- Williams Road/Boronda Road (#40): LOS F during both peak hours
- South Sanborn Road/North Sanborn Road/John Street (#45): LOS E during AM peak hour
- Salinas Street/North Main Street/West Market Street/East Market Street (#55): LOS F during both peak hours.

In addition, the following ramp junctions would function below County CMP standards during the p.m. peak hour:

- U.S. 101 Northbound Boronda Road Off-Ramp: LOS E (36.6 passenger cars per vehicle per lane)
- U.S. 101 Northbound West Laurel Drive Off-Ramp: LOS E (37.0 passenger cars per vehicle per lane)

Operation at all ten of these intersections and both of the aforementioned ramp junctions could be mitigated to acceptable levels of delay under Existing Plus Project and West Area Specific Plan conditions. With implementation of the recommended improvements described below, operation at all ten of the affected intersections and both ramp junctions, as identified above, would be improved to acceptable levels:

- **San Juan Grade Road & Van Buren Avenue (#14):** Install traffic signal. The addition of a traffic signal would improve the intersection LOS to A for both peak periods, with 4.9 seconds of delay and 4.2 seconds of delay during the AM and PM peak hours, respectively. As this impact is a result of project traffic, the project applicant would be responsible for its funding and implementation at the project approval stage. The improvement is also a recommended condition of approval for the West Area Specific Plan; thus, the project shall contribute fair share funding towards its implementation if the West Area Specific Plan proceeds. With the implementation of the identified improvement, the impact would not be adverse.

- **North Main Street & East Boronda Road (#17):** Optimize signal timing. The optimization of the existing traffic signal timing and splits at this coordinated intersection would mitigate the identified impact. With the implementation of the identified improvement, the impact would not be adverse.

- **San Juan Grade Road & East Boronda Road (#19):** Optimize existing signal timing. Optimizing the intersection's signal timing during the PM peak hour would improve its operation to LOS D (50.1 seconds). As this impact is a result of project traffic, the project applicant would be responsible for its funding and implementation at the project approval stage. With the implementation of the identified improvement, the impact would not be adverse.

- **North Main Street & West Laurel Drive (#32):** Optimize existing signal timings. This proposed improvement was found to improve level of service to LOS D, with 49.1 seconds of delay during the evening peak hour. As this impact is a result of project traffic, the project applicant would be responsible for its funding and implementation at the project approval stage. With the implementation of the identified improvement, the impact would not be adverse.

- **Natividad Road & East Laurel Drive (#33):** Convert the eastbound right turn lane to a shared through-right turn lane. With the implementation of the proposed improvement, as well as implementation of the previously identified

Condition of Approval 3.10-2 (which requires fair share payments for the widening of the intersection and the addition of northbound and southbound through lanes), the impact would not be adverse.

- **North Sanborn Road/Boronda Road (#35):** Install a roundabout. The roundabout shall be of adequate size and configuration to adequately serve forecast traffic levels in accordance with City General Plan policies. With the implementation of this proposed improvement, the impact would not be adverse.

- **Sherwood Drive/Natividad Road & East Bernal Drive/La Posada Way (#38):** Optimize existing signal timings and add an eastbound left turn pocket. The improvement is also a recommended condition of approval for the West Area Specific Plan; thus, the project shall contribute fair share funding towards its implementation if the West Area Specific Plan proceeds. With the implementation of the recommended improvement, the impact would not be adverse.

- **Williams Road/East Boronda Road (#40):** Install a traffic signal or roundabout, to improve the intersection's LOS to A during the evening peak hour. With the implementation of the recommended improvement, the impact would be less than significant.

- **South Sanborn Road/North Sanborn Road/John Street (#45)**: Optimize signal timing. With the implementation of the recommended improvement, the impact would be less than significant.

- **Salinas Street/North Main Street/West Market Street/East Market Street (#55)**: Add a southbound left turn lane and optimize the traffic signal's timing. The improvement is also a recommended condition of approval for the West Area Specific Plan; thus, the project shall contribute fair share funding towards its implementation if the West Area Specific Plan proceeds. With implementation of this recommended improvement, the impact would not be adverse.

- **U.S. 101 Ramp Junctions:** Contribution to the TAMC RDIF Program and payment of the City of Salinas's Traffic Impact Fees for the U.S. 101 Northbound Boronda Road Off-Ramp and the U.S. 101 Northbound West Laurel Drive Off-Ramp. The proposed method for addressing this impact is the project requirement to contribute to the TAMC Regional Development Impact Fee (RDIF) Program and the City of Salinas's Traffic Impact Fee (TIF) Program. These programs include improvements to U.S. 101 that would improve mainline and ramp junction operations, which would reduce this project impact to a level that is not adverse.

CONCLUSION

Under Existing Plus Project and West Area Specific Plan conditions, implementation of the proposed Specific Plan may conflict with the performance measures established by the City of Salinas, Monterey County, and Caltrans. While the use of LOS within CEQA is no longer permitted, the City desires to manage congestion levels to maintain consistency with its General Plan and the County's General Plan. In accordance with these guidelines, conditions of approval are identified and recommended to manage congestion levels to those specified within the current General Plans. With implementation of Recommended Conditions of Approval 3.10-1 through 3.10-6, and the following additional recommended conditions of approval, the impacts to the ten intersections and two ramp junctions described above are considered **not adverse**, and no further recommended conditions are required.

RECOMMENDED CONDITIONS OF APPROVAL

Recommended Condition of Approval 3.10-7: Each project applicant for development within the Specific Plan Area shall provide its fair-share funding for the installation of a traffic signal at San Juan Grade Road/Van Buren Avenue, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans for each stage of project development shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design, as specified by the City of Salinas Public Works Department.

Recommended Condition of Approval 3.10-8: Each project applicant for development within the Specific Plan Area shall provide its fair-share of funding to optimize the existing traffic signal timing and splits at intersection of North Main Street/East Boronda Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design, as specified by the City of Salinas Public Works Department.

Recommended Condition of Approval 3.10-9: Each project applicant for development within the Specific Plan Area shall provide its fair-share funding for the optimization of the existing signal timing at San Juan Grade Road/East Boronda Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be

determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design, as specified by the City of Salinas Public Works Department.

Recommended Condition of Approval 3.10-10: Each project applicant for development within the Specific Plan Area shall provide its fair-share of funding to convert the eastbound right turn lane to a shared through-right turn lane at Natividad Road/East Laurel Drive, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for nonresidential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design, as specified by the City of Salinas Public Works Department.

Recommended Condition of Approval 3.10-11: Each project applicant for development within the Specific Plan Area shall provide its fair-share of funding for the installation of a roundabout at the intersection of North Sanborn Road/East Boronda Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design.

Recommended Condition of Approval 3.10-12: Each project applicant for development within the Specific Plan Area shall provide its fair-share of funding for the installation of a traffic signal at the intersection of Williams Road/East Boronda Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design.

Recommended Condition of Approval 3.10-13: Each project applicant for development within the Specific Plan Area shall provide its fair-share of funding to add a southbound left turn pocket and optimize traffic signal timings at the traffic signal at Salinas Street/North Main Street/West Market Street/East Market Street, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to

building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design, as specified by the City of Salinas Public Works Department.

Impact 3.10-3: Under Cumulative Plus Project conditions, implementation of the proposed Specific Plan may conflict with the transportation performance measures established by the City of Salinas, Monterey County, and Caltrans (Adverse and Unavoidable)

Per the Draft EIR, implementation of the Specific Plan under the cumulative Plus Project scenario would result in unacceptable operation at fourteen of the study intersections, and three of the freeway segments. This would be a **potentially adverse** impact.

The locations that would operate with unacceptable LOS under the cumulative scenario include the following intersections:

- U.S. 101 Southbound Ramps/Echo Valley Road/Crazy Horse Canyon Road (#1): LOS F during the PM peak hour
- U.S. 101 Northbound Ramps/Crazy Horse Canyon Road (#2): LOS E during the PM peak hour
- Crazy Horse Canyon Road/San Juan Grade Road (#5): LOS F during the PM peak hour
- Natividad Road/Rogge Road (#12): LOS E during the PM peak hour
- Natividad Road/Russell Road (#13): LOS F during the PM peak hour
- North Main Street/Boronda Road (#17): LOS E during the PM peak hour
- North Main Street/West Laurel Drive (#32): LOS F during the PM peak hour
- Natividad Road/East Laurel Drive (#33): LOS F during both peak hours
- Constitution Boulevard/East Laurel Drive (#34): LOS E during the PM peak hour
- Old Stage Road/Williams Road/Private Road (#36): LOS F during both peak hours
- North Main Street/East Bernal Drive (#37): LOS E during both peak hours
- Sherwood Drive/Natividad Road/East Bernal Drive/La Posada Way (#38): LOS F during both peak hours
- South Davis Road/Blanco Road (#53): LOS F during both peak hours
- Salinas Street/North Main Street/West Market Street/East Market Street (#55): LOS E during both the PM peak hour
- South Main Street/West Blanco Road/East Blanco Road (#56): LOS E during the PM peak hour

In addition, the following freeway segments would operate with unacceptable LOS under the cumulative scenario:

- San Juan Road to Crazy Horse Canyon Road:
  - Southbound: LOS E during PM peak hour
- San Miguel Canyon Road to SR 156:
  - Northbound: LOS E during AM peak hour and LOS F during PM peak hour
  - Southbound: LOS F during PM peak hour
- SR 156 to Sala Road (southbound): LOS E during the PM peak hour

All ramp junctions perform at or above the minimum standards set by the County CMP under this scenario.

With implementation of the recommended improvements described below, operation at all fourteen of the affected intersections and each of the freeway segments would be improved:

- **U.S. 101 Southbound Ramps/Echo Valley Road/Crazy Horse Canyon Road (#1)**: Install a traffic signal at this intersection. However, while the project would make a fair-share contribution to mitigate its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **U.S. 101 Northbound Ramps/Crazy Horse Canyon Road (#2)**: Install traffic signal. However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **Crazy Horse Canyon Road/San Juan Grade Road (#5)**: Install traffic signal. However, while the project would make a fair share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **Natividad Road/Rogge Road (#12)**: Install traffic signal. However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **Natividad Road/Russell Road (#13)**: Install traffic signal. However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **North Main Street/East Boronda Road (#17)**: Install southbound and westbound left turn lanes. The project should make a fair-share contribution to offset its contribution to this adverse cumulative adverse impact. Additionally, implement previously described recommendation to optimize signal timing (see Recommended Condition of Approval 3.10-8). As the City has been collecting funds from other development projects to improve this intersection, this contribution would offset the project's contribution to the adverse cumulative impact at this location.

- **North Main Street/West Laurel Drive (#32)**: Install northbound right turn overlap phase. Additionally, implement previously described recommendation to optimize existing signal timings (see Recommended Condition of Approval 3.10-1). However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **Natividad Road/East Laurel Drive (#33)**: Install northbound and southbound through lanes, and previously identified recommendation to convert the eastbound right turn lane to a shared through-right turn lane (see Recommended Condition of Approval 3.10-10). However, under cumulative conditions, the degradations in service levels are considered to be adverse cumulative impacts based on the City's significance thresholds. Thus, this cumulative impact is considered adverse and unavoidable.

- **Constitution Boulevard/East Laurel Drive (#34)**: Install southbound left turn lane. However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **Old Stage Road/Williams Road/Private Road (#36)**: Install traffic signal. However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **North Main Street/East Bernal Drive (#37)**: Install a northbound through lane, add in a northbound right turn overlap phase, and convert the westbound through lane to a westbound shared through-left turn lane. However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **Sherwood Drive/Natividad Road & East Bernal Drive/La Posada Way (#38)**: Install northbound and southbound through lanes. Additionally, implement the previously identified recommendation to optimize existing signal timings and add an eastbound left turn pocket (see Recommended Condition of Approval 3.10-4). However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **Williams Road/East Boronda Road (#40)**: Install a traffic signal or roundabout, to improve the intersection's LOS to A during the evening peak hour. Additionally, implement previously identified recommendation to install an eastbound left turn lane (see Recommended Condition of Approval 3.10-25). As this improvement is part of the City's Traffic Improvement Program, the City has been collecting funds from other development projects to improve this intersection, this contribution would offset the project's contribution to the adverse cumulative impact at this location.

- **South Davis Road/Blanco Road (#53)**: Install a westbound left turn lane. This improvement is part of the City's Traffic Improvement Program. As the City has been collecting funds from other development projects to improve this intersection, this contribution would offset the project's contribution to the adverse cumulative impact at this location.

- **Main Street/Blanco Road (#56)**: Install a northbound left turn lane. This improvement is part of the City's Traffic Improvement Program. However, even with this mitigation, this cumulative impact is considered adverse and unavoidable.

- **U.S. 101 Mainline Segments:** Contribution to the TAMC RDIF Program and payment of the City of Salinas's Traffic Impact Fees for the U.S. 101 Northbound Boronda Road Off-Ramp and the U.S. 101 Northbound West Laurel Drive Off-Ramp (see previously identified Recommended Condition of Approval 3.10-6). The proposed condition of approval for this impact is the project requirement to contribute to the TAMC Regional Development Impact Fee (RDIF) Program and the City of Salinas's Traffic Impact Fee (TIF) Program. These programs include improvements to U.S. 101 that would improve mainline and ramp junction operations, which would reduce this project impact to a less than adverse level.

CONCLUSION

Under Cumulative Plus Project conditions, implementation of the proposed Specific Plan may conflict with the transportation performance measures established by the City

of Salinas, Monterey County, and Caltrans. While the use of LOS within CEQA is no longer permitted, the City desires to manage congestion levels to maintain consistency with its General Plan and the County's General Plan. In accordance with these guidelines, conditions of approval are identified and recommended to manage congestion levels to those specified within the current General Plans. The proposed project under the cumulative scenario would require the implementation of the following recommended conditions of approval, as well as previously identified Recommended Conditions of Approval 3.10-1 through 3.10-13, which are provided within the Traffic Impact Assessment developed by Fehr & Peers. However, even with implementation of these conditions of approval, the project would have a **cumulatively considerable** and **adverse and unavoidable** impact under this scenario.

RECOMMENDED CONDITIONS OF APPROVAL

Recommended Condition of Approval 3.10-14: Each project applicant for development within the Specific Plan Area shall contribute its fair-share of funding to the TAMC Regional Development Impact Fee to provide improvements addressing this impact identified as the installation of a traffic signal at intersection of U.S. 101 Southbound Ramps/Echo Valley Road/Crazy Horse Canyon Road. Regional fees shall be determined by the City of Salinas in consultation with TAMC. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design, as specified by the City of Salinas Public Works Department.

Recommended Condition of Approval 3.10-15: Each project applicant for development within the Specific Plan Area shall contribute its fair-share of the TAMC Regional Development Impact Fee to provide improvements addressing this impact identified as the installation of a traffic signal at intersection of U.S. 101 Northbound Ramps/Crazy Horse Canyon Road. Total fees shall be determined by the City of Salinas in consultation with TAMC Fees are payable to final improvement plans for each tentative map.

Recommended Condition of Approval 3.10-16: Prior to the approval of final improvement plans for each tentative map, each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of a traffic signal at intersection of Crazy Horse Canyon Road/San Juan Grade Road, in proportion to the area planned for development by such project applicant. Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall consider the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design, as specified by the City of Salinas Public Works Department.

Recommended Condition of Approval 3.10-17: Each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of a traffic signal at intersection of Natividad Road/Rogge Road, in proportion to the area planned for development by such project applicant, in accordance

with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall consider the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design, as specified by the City of Salinas Public Works Department.

Recommended Condition of Approval 3.10-18: Each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of a traffic signal at intersection of Natividad Road/Russell Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design, as specified by the City of Salinas Public Works Department.

Recommended Condition of Approval 3.10-19: Each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of southbound and westbound left turn lanes at the intersection of North Main Street/East Boronda Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design, as specified by the City of Salinas Public Works Department.

Recommended Condition of Approval 3.10-20: Each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of a northbound right turn overlap phase at the intersection of North Main Street/West Laurel Drive, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

Recommended Condition of Approval 3.10-21: Each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of a southbound left turn lane at the intersection of Constitution Boulevard/East Laurel Drive, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for

nonresidential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

Recommended Condition of Approval 3.10-22: Each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of a traffic signal at the intersection of Old Stage Road/Williams Road/Private Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design, as specified by the City of Salinas Public Works Department.

Recommended Condition of Approval 3.10-23: Each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of a northbound through lane, the addition of a northbound right turn overlap phase, and the conversion of the westbound through lane to a westbound shared through-left turn lane at the intersection of North Main Street/East Bernal Drive, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note these improvements and the fair-share funding requirement.

Recommended Condition of Approval 3.10-24: Each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of a northbound and southbound through lanes at the intersection of Sherwood Drive/Natividad Road & East Bernal Drive/La Posada Way, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

Recommended Condition of Approval 3.10-25: Each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of an eastbound left turn lane at the intersection of Williams Road/East Boronda Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

Recommended Condition of Approval 3.10-26: Each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of a westbound left turn lane at the intersection of South Davis Road/Blanco Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

Recommended Condition of Approval 3.10-27: Each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of a northbound left turn lane at the intersection of Main Street/Blanco Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

Impact 3.10-4: Under Cumulative Plus Project with West Area Specific Plan conditions, implementation of the proposed Specific Plan may conflict with the transportation performance measures established by the City of Salinas, Monterey County, and Caltrans (Adverse and Unavoidable)

Implementation of the Specific Plan would result in unacceptable operation at twenty-two of the study intersections, and four of the freeway segments, under the cumulative Plus Project with West Area Specific Plan scenario. This would be a **potentially adverse** impact.

The locations that would operate with unacceptable LOS under the cumulative plus project with Central Area Specific Plan scenario include the following intersections:

- U.S. 101 Southbound Ramps/Echo Valley Road/Crazy Horse Canyon Road (#1): LOS F during the PM peak hour
- U.S. 101 Northbound Ramps/Crazy Horse Canyon Road (#2): LOS F during the PM peak hour
- Crazy Horse Canyon Road/San Juan Grade Road (#5): LOS F during the PM peak hour
- Hebert Road/San Juan Grade Road (#6): LOS E during the PM peak hour
- Old Stage Road/Herbert Road (#7): LOS E during PM peak hour
- Natividad Road/Rogge Road (#12): LOS F during the PM peak hour
- Natividad Road/Russell Road (#13): LOS F during both peak hours
- San Juan Grade Road/Van Buren Avenue (#14): LOS F during both peak hours
- North Main Street/Boronda Road (#17): LOS F during the PM peak hour
- Natividad Road/Boronda Road (#22): LOS F during PM peak hour

- North Main Street/West Laurel Drive (#32): LOS F during the PM peak hour
- Natividad Road/East Laurel Drive (#33): LOS F during both peak hours
- Constitution Boulevard/East Laurel Drive (#34): LOS F during both peak hours
- North Sanborn Road/Boronda Road (#35): LOS F during PM peak hour
- Old Stage Road/Williams Road/Private Road (#36): LOS F during both peak hours
- North Main Street/East Bernal Drive (#37): LOS E during both peak hours
- Sherwood Drive/Natividad Road/East Bernal Drive/La Posada Way (#38): LOS F during both peak hours
- Williams Road/East Boronda Road (#40): LOS F During PM peak hour
- East Front Street/Sherwood Drive/Market Street (#51): LOS E during PM peak hour
- South Davis Road/Blanco Road (#53): LOS F during both peak hours
- Salinas Street/North Main Street/West Market Street/East Market Street (#55): LOS F during both peak hours
- South Main Street/West Blanco Road/East Blanco Road (#56): LOS E during PM peak hour

In addition, the following freeway segments would operate with unacceptable LOS under the cumulative plus project with Central Area Specific Plan scenario:

- San Juan Road to Crazy Horse Canyon Road:
  - Southbound: LOS F during the PM peak hour
  - Northbound: San Juan Road to Crazy Horse Canyon Road (northbound): LOS E during both peak hours
- Crazy Horse Canyon Road to San Miguel Canyon Road: (southbound) LOS E during the PM peak hour
- San Miguel Canyon Road to SR 156:
  - Northbound: LOS F during both peak hours
  - Southbound: LOS E during AM peak hour and LOS F during PM peak hour
- SR 156 to Sala Road (southbound): LOS F during the PM peak hour

All ramp junctions perform at or above the minimum standards set by the County CMP under this scenario.

With implementation of the recommended improvements described below, operation at all twenty-two of the affected intersections and the each of the freeway segments would be improved:

- **U.S. 101 Southbound Ramps/Echo Valley Road/Crazy Horse Canyon Road (#1)**: Install a traffic signal at this intersection. However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **U.S. 101 Northbound Ramps/Crazy Horse Canyon Road (#2)**: Install a traffic signal at this intersection. However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **Crazy Horse Canyon Road/San Juan Grade Road (#5)**: Install traffic signal. With the implementation of the identified improvement, the cumulative impact would be less than significant.

- **Old Stage Road/Hebert Road (#7):** Install traffic signal. With the implementation of the identified improvement, the cumulative impact would be less than significant.

- **Natividad Road/Rogge Road (#12)**: Install traffic signal. However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **Natividad Road/Russell Road (#13)**: Install traffic signal. However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **San Juan Grade Road/Van Buren Avenue (#14)**: Install traffic signal. With the implementation of the identified improvement, the cumulative impact would be less than significant.

- **North Main Street/East Boronda Road (#17)**: Install southbound and westbound left turn lanes. Additionally, implement previously described recommendation to optimize signal timing (see Recommended Condition of Approval 3.10-8). However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **Natividad Road/Boronda Road (#22):** No further physical improvements are possible at this location. This cumulative impact is considered adverse and unavoidable.

- **Natividad Road/East Laurel Drive (#33)**: Install northbound and southbound through lanes. However, under cumulative conditions, the degradations in

service levels are considered to be adverse cumulative impacts based on the City's significance thresholds. Thus, this cumulative impact is considered adverse and unavoidable.

- **Constitution Boulevard/East Laurel Drive (#34)**: Install southbound left turn lane. Additionally, implement previously recommendation to install an eastbound left turn lane (see Recommended Condition of Approval 3.10-29). However, even with these improvements, this cumulative impact is considered adverse and unavoidable.

- **North Sanborn Road/Boronda Road (#35):** Install a roundabout. The roundabout shall be of adequate size and configuration to adequately serve forecast traffic levels in accordance with City General Plan policies. With the implementation of the identified improvement, the cumulative impact would not be adverse.

- **Old Stage Road/Williams Road/Private Road (#36)**: Install traffic signal. With the implementation of the identified improvement, the cumulative impact would not be adverse.

- **North Main Street/East Bernal Drive (#37)**: Install a northbound through lane, add in a northbound right turn overlap phase, and convert the westbound through lane to a westbound shared through-left turn lane. However, even with this improvement, this cumulative impact is considered adverse and unavoidable.

- **Sherwood Drive/Natividad Road & East Bernal Drive/La Posada Way (#38)**: Install northbound and southbound through lanes. Additionally, implement the previously identified recommendation to optimize existing signal timings and add an eastbound left turn pocket (see Recommended Condition of Approval 3.10-4). However, while the project would make a fair-share contribution to offset its contribution to this impact, there is no mechanism to ensure the full funding and completion of the improvement. Thus, this cumulative impact is considered adverse and unavoidable.

- **Williams Road/East Boronda Road (#40)**: Install a traffic signal or roundabout, to improve the intersection's LOS to A during the evening peak hour. Additionally, implement previously identified recommendation to install an eastbound left turn lane (see Recommended Condition of Approval 3.10-25). With the implementation of the identified improvements, the cumulative impact would not be adverse.

- **East Front Street/Sherwood Drive/Market Drive (#51)**: Install southbound left turn lane. With the implementation of the identified improvement, the cumulative impact would not be adverse.

- **South Davis Road/Blanco Road (#53)**: Install a westbound left turn lane. However, even with this improvement, this cumulative impact is considered adverse and unavoidable.

- **Salinas Street/North Main Street/West Market Street/East Market Street (#55):** Install southbound left turn lane and optimize signal timings. In addition, implement previiously identified recommendation to install an eastbound through lane (see Recommended Condition of Approval 3.10-32). However, even with these improvements, this cumulative impact is considered adverse and unavoidable.

- **South Main Street/Blanco Road (#56)**: Install a northbound left turn lane. This improvement is part of the City's Traffic Improvement Program. However, even with this improvement, this cumulative impact is considered adverse and unavoidable.

- **U.S. 101 Mainline Segments:** Contribution to the TAMC RDIF Program and payment of the City of Salinas's Traffic Impact Fees. The proposed method for addressing this impact is the project's required contribution to the TAMC RDIF Program and the City of Salinas's TIF Program. These programs include improvements to U.S. 101 that would improve mainline and ramp junction operations. However, even with these payments, this cumulative impact is considered adverse and unavoidable.

CONCLUSION

Under Cumulative Plus Project with West Area Specific Plan conditions, implementation of the proposed Specific Plan may conflict with the transportation performance measures established by the City of Salinas, Monterey County, and Caltrans. While the use of LOS within CEQA is no longer permitted, the City desires to manage congestion levels to maintain consistency with its General Plan and the County's General Plan. In accordance with these guidelines, conditions of approval are identified and recommended to manage congestion levels to those specified within the current General Plans. The proposed project under the cumulative Plus West Area Specific Plan scenario would require the implementation of the following mitigation measure, as well as previously identified Recommended Conditions of Approval 3.10-1 through 3.10-27, which are provided within the Traffic Impact Assessment developed by Fehr & Peers. However, even with implementation of these conditions of approval, the project would have a **cumulatively considerable** and **adverse and unavoidable** impact under this scenario.

RECOMMENDED CONDITIONS OF APPROVAL

Recommended Condition of Approval 3.10-28: Prior to the approval of final improvement plans for each tentative map, each project applicant for development within the Specific Plan Area shall provide its fair-share contribution for the installation of a traffic signal at intersection of Old Stage Road/Hebert Road, in proportion to the area planned for development by such project applicant. Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement. This condition shall include the use of currently available Adaptive Traffic Control Systems (ATCS) in the intersection design.

Recommended Condition of Approval 3.10-29: Each project applicant for development within the Specific Plan Area shall provide its fair-share of funding for the installation of an eastbound left turn lane at Constitution Boulevard/East Laurel Drive, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

Recommended Condition of Approval 3.10-30: Each project applicant for development within the Specific Plan Area shall provide its fair-share of funding for the installation of an appropriately sized roundabout at North Sanborn Road/Boronda Road, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

Recommended Condition of Approval 3.10-31: Each project applicant for development within the Specific Plan Area shall provide its fair-share of funding for the installation of a southbound left turn lane at East Front Street/Sherwood Drive/Market Drive, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final improvement plans shall note this improvement and the fair-share funding requirement.

Recommended Condition of Approval 3.10-32: Each project applicant for development within the Specific Plan Area shall provide its fair-share of funding for the installation of an eastbound through lane at Salinas Street/North Main Street/West Market Street/East Market Street, in proportion to the area planned for development by such project applicant, in accordance with City policies (payable prior to issuance of Certificate of Occupancy for residential and prior to building permit issuance for non-residential development). Total fees shall be determined by the City of Salinas. The final

improvement plans shall note this improvement and the fair-share funding requirement.

Recommended Condition of Approval 3.10-33: Implement previously identified Recommended Condition of Approval 3.10-14, which identifies the need to install a traffic signal at the intersection at U.S. 101 Southbound Ramps/Echo Valley Road/Crazy Horse Canyon Road.

Recommended Condition of Approval 3.10-34: Implement previously identified Recommended Condition of Approval 3.10-15, which identifies the need to install a traffic signal at the intersection at U.S. 101 Northbound Ramps/Crazy Horse Canyon Road.

Recommended Condition of Approval 3.10-35: Implement previously identified Recommended Condition of Approval 3.10-16, which identifies the need to install a traffic signal at the intersection at Crazy Horse Canyon Road/San Juan Grade Road.

Recommended Condition of Approval 3.10-36: Implement previously identified Recommended Condition of Approval 3.10-28, which identifies the need to install a traffic signal at the intersection at Old Stage Road/Hebert Road.

Recommended Condition of Approval 3.10-37: Implement previously identified Recommended Condition of Approval 3.10-17, which identifies the need to install a traffic signal at the intersection at Natividad Road/Rogge Road.

Recommended Condition of Approval 3.10-38: Implement previously identified Recommended Condition of Approval 3.10-18, which identifies the need to install a traffic signal at the intersection at Natividad Road/Russell Road.

Recommended Condition of Approval 3.10-39: Implement previously identified Recommended Condition of Approval 3.10-7, which identifies the need to install a traffic signal at the intersection at San Juan Grade Road/Van Buren Avenue.

Recommended Condition of Approval 3.10-40: Implement previously identified Recommended Condition of Approval 3.10-8 and 3.10-19, which identifies the need to install southbound and westbound left turn lanes, and to optimize signal timing, at North Main Street/East Boronda Road.

Recommended Condition of Approval 3.10-41: Implement previously identified Recommended Condition of Approval 3.10-2, which identifies the need to install northbound and southbound through lanes at Natividad Road/East Laurel Drive.

Recommended Condition of Approval 3.10-42: Implement previously identified Recommended Condition of Approval 3.10-21 and 3.10-29, which identify the need to Install southbound left turn lane and an eastbound left turn lane at Constitution Boulevard/East Laurel Drive.

Recommended Condition of Approval 3.10-43: Implement previously identified Recommended Condition of Approval 3.10-3, which identifies the need to install a roundabout at the intersection at North Sanborn Road/Boronda Road.

Recommended Condition of Approval 3.10-44: Implement previously identified Recommended Condition of Approval 3.10-22, which identifies the need to install a traffic signal at the intersection at Old Stage Road/Williams Road/Private Road.

Recommended Condition of Approval 3.10-45: Implement previously identified Recommended Condition of Approval 3.10-23, which identifies the need to install a northbound through lane, add in a northbound right turn overlap phase, and convert the westbound through lane to a westbound shared through-left turn lane at the intersection of North Main Street/East Bernal Drive.

Recommended Condition of Approval 3.10-46: Implement previously identified Recommended Condition of Approvals 3.10-4 and 3.10-24, which identify the need to install northbound and southbound through lanes, Optimize existing signal timings, and add an eastbound left turn pocket, at the intersection of Sherwood Drive/Natividad Road & East Bernal Drive/La Posada Way.

Recommended Condition of Approval 3.10-47: Implement previously identified Recommended Conditions of Approval 3.10-12 and 3.10-25, which identify the need to traffic signal or roundabout, to improve the intersection's LOS to A during the evening peak hour, and to install an eastbound left turn lane, at the intersection of Williams Road/East Boronda Road.

Recommended Condition of Approval 3.10-48: Implement previously identified Recommended Condition of Approval 3.10-31, which identifies the need install a southbound left turn lane at the intersection of East Front Street/Sherwood Drive/Market Drive.

Recommended Condition of Approval 3.10-49: Implement previously identified Recommended Condition of Approval 3.10-26, which identifies the need install a westbound left turn lane at the intersection of South Davis Road/Blanco Road.

Recommended Condition of Approval 3.10-50: Implement previously identified Recommended Conditions of Approval 3.10-13 and 3.10-32, which identify the need to install a southbound left turn lane and optimize signal timings, and to install an eastbound through lane, at the intersection of Salinas Street/North Main Street/West Market Street/East Market Street.

Recommended Condition of Approval 3.10-51: Implement previously identified Recommended Condition of Approval 3.10-27, which identifies the need to install a northbound left turn lane at the intersection at South Main Street/Blanco Road.

Recommended Condition of Approval 3.10-52: Implement previously identified Recommended Condition of Approval 3.10-6, which identifies the need to contribute to the TAMC RDIF Program and payment of the City of Salinas's Traffic Impact Fees for the U.S. 101 Mainline Segments.

Impact 3.10-5: Implementation of the proposed Specific Plan would not substantially increase hazards due to a design feature (Less than Significant)

The Specific Plan Area is within the jurisdiction of the City of Salinas and is subject to all design standards which minimize hazards due to design features. The proposed land use changes that are estimated to add traffic to current and proposed streets would be carefully evaluated through the development review process. If needed, individual projects would be conditioned to construct or provide funding for improvements that minimize or eliminate potential hazards. Typical improvements include shoulder widening, adding turn pockets, adding sidewalks or crosswalks, realigning sharp curves, prohibiting certain turning movements, and signalizing intersections, among other options. Newly constructed and upgraded roadways needed to accommodate new development would be designed according to applicable State and local design standards.

Conclusion: Implementation of the proposed Specific Plan would not substantially increase hazards due to a design feature. Development within the Specific Plan Area would include new streets, access points, paths, and other circulation improvements that would be reviewed and checked for compliance with design and safety standards as part of the entitlement process conducted by the City of Salinas. Therefore, this impact would be **less than significant**.

Impact 3.10-6: Implementation of the proposed Specific Plan would not result in impacts related to emergency access (Less than Significant)

Buildout of the proposed Specific Plan would result in increased development densities and land use intensities within the Specific Plan Area. As a result of buildout of the Central Area Specific Plan, which includes the development of an internal transportation network within the Plan Area, the volume of users travelling within the Specific Plan Area is expected to increase. Emergency access along proposed and existing roadways must be accommodated in conjunction within the expected population and employment growth. Fire Departments, Police Departments and ambulance providers adjust their services over time to provide response times in accordance with their local, state and national mandates. As traffic and congestion levels shift over time, these services adapt to provide response times within their governing requirements. The recommended conditions of approval provided herein as implemented will reduce the need for local departments to modify and/or augment their services to provide acceptable emergency vehicle response times. Plans submitted for individual developments to be constructed in the Specific Plan Area would be reviewed for compliance with emergency access

requirements by public safety officials during the City's entitlement process. Implementation of the proposed Specific Plan would not result in impacts related to emergency access. Given these conditions, any impacts to emergency access are anticipated to be **less than significant**.

Impact 3.10-7: Implementation of the proposed Specific Plan would not conflict with adopted multi-modal circulation policies, plans, or programs, and would not decrease the performance or safety of public transit, bicycle, or pedestrian facilities (Less than Significant)

Impacts to Pedestrians and Bicyclists: Overall, existing plans and policies are supportive of multimodal activity including bicycling and walking within the City of Salinas. City policies related to biking and walking are defined in the existing General Plan Circulation Element through Goal C-4 and Goal C-5. Together, these goals set citywide policies that provide for safe and accessible bicycle and pedestrian facilities. Additionally, the 2002 Salinas Bikeways Plan and 2004 Salinas Pedestrian Plan provide prioritized lists of projects and programs in service of the above goals. In accordance with the standards of significance, the Central Area Specific Plan would not have significant impacts on the bicycle and pedestrian network because the Specific Plan does not interfere with existing plans or policies related to biking and/or walking. In addition, the Specific Plan proposes a robust internal network of pedestrian and bicycle facilities in accordance with adopted multi-modal circulation policies, plans and programs.

As estimated by Fehr & Peers (2019), the CASP is expected to generate approximately 1,900 daily walking and biking trips; 280 of which are anticipated in the morning peak hour and 240 of which are anticipated in the evening peak hour. The CASP includes specifications to include new bicycle and pedestrian facilities that will provide access to the site.

Implementation of the Specific Plan would be consistent with, and would expand upon, the pedestrian and bicycle network identified in the 2002 Salinas Bikeways Plan. The Specific Plan would improve the existing bicycle and pedestrian circulation infrastructure within the Specific Plan Area, as well as adjacent areas in the City of Salinas. Ultimately, the planned pedestrian and bicycle circulation networks, as well as policies pertaining to pedestrian and bicycle circulation, encourage active transportation. Impacts related to pedestrians and bicyclists would be **less than significant**.

Impacts to Public Transit: Implementation of the proposed Specific Plan is expected to increase population and employment within the Specific Plan Area, as well as the City of Salinas. According to Policy C-3.1 and Policy C-3.2 of the current Salinas General Plan, the City shall support Monterey-Salinas Transit (MST) in developing frequent and effective public transportation service, including to and from new development areas. The Central Area Specific Plan is estimated to generate approximately 800 new transit trips on a daily basis, as well as 130 trips in the morning

peak hour and 140 trips in the evening peak hour (Fehr & Peers, 2019). These new transit trips alone are not expected to overburden existing transit service in the area. The five existing MST routes serving the study area have sufficient capacity to serve project generated transit trips. MST also routinely updates its route structure and service frequencies in response to changing ridership and land use patterns. Additionally, this project does not conflict with an existing transit-related policy or plan in the City.

Conclusion: Implementation of the proposed Specific Plan would not conflict with adopted multimodal circulation policies, plans, or programs, and would not decrease the performance or safety of public transit, bicycle, or pedestrian facilities. Impacts to pedestrians and bicycles and public transit would be **less than significant** and no mitigation is required.

Applicable Mitigation from Prior EIR (if any)

No mitigation is required, though numerous conditions of approval dealing with traffic of level of service must be satisfied by the applicant. The General Plan Mitigation Measures discussed above imposed duties on the City of Salinas, and not on individual property owners within the CASP.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable.

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
18. TRIBAL CULTURAL RESOURCES. *Would the project:* (a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public					

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Californian Native American tribe, and that is:					
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or	☐	☐	☐	☒	☐
ii. A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 In applying the criteria set forth in Subdivision (c) of Public Resource	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
Code 5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.					

Discussion

Overall conclusion: The CASP EIR provides project-level detail with respect to the proposed tentative subdivision map's effects on tribal cultural resources, in part due to the mitigation measures required to reduce such effects. The tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the impacts of the proposed tentative subdivision map on tribal cultural resources.

Response a.) As discussed above in Cultural Resources, no historical resources were found during field surveys for the CASP. Additionally, there are no historical resources that have been identified in the Specific Plan Area on maps and files maintained by the Northwest Information Center (NWIC). There have been four previous cultural resource studies that examined approximately three-quarters of the Specific Plan Area and no historical resources were documented. The Monterey County Historic Property Data File Directory and National Register of Historic Resources do not list any historical resources in the Specific Plan Area.

Most fossils within Monterey County consist of micro-organisms such as foraminifera or diatoms, or assemblages of mollusks and barnacles most commonly found in sedimentary rocks ranging from Cretaceous age (138 to 96 million years old) to Pleistocene age (1.6 million to 11 thousand years old). Fossils are found throughout the Monterey County because of the widespread distribution of marine deposits. No significant fossil records have been discovered within the Specific Plan Area. However,

the City of Salinas General Plan EIR (2002) identifies that important archaeological resources have the potential to occur within the General Plan planning area, including within portions of the undeveloped North of Boronda FGA. These areas are the Carr Lake/Natividad Creek corridor and a wide band on either side of Highway 101 in the northwest portion of the General Plan planning area.

Per the Final EIR, letters were sent to: the Native American Heritage Commission; Mr. Tom Little Bear Nason, Esslen Tribe of Monterey County; Tony Cerda, Chairperson, Coastanoan Rumsen Carmel Tribe; Ms. Louise Miranda-Ramirez, Chairperson, Ohlone Coastanoan-Esselen Nation; Mr. Valentine Lopez, Amah Mutsun Tribal Band; Ms. Irene Zwierlein, Chairperson, Amah Mutsun Tribal Band of Mission San Juan Bautista; and, Ms. Ann Marie Sayers, Chairperson, Indian Canyon Mutsun Band of Coastanoan. The Native American Heritage Commission responded with a letter dated April 3, 2017. Ms. Louise Miranda-Ramirez, Chairperson, Ohlone/Coastanoan-Esselen Nation responded by letter on April 22, 2017 stating that the project area is within "the indigenous homeland of our people." The letter further states that the Ohlone/Coastanoan Esselen Nation (OCEN) objects to all excavation at known cultural sites. OCEN also requests to be provided with archaeological reports and to be involved with any archaeological projects within their area, including site monitoring. OCEN specifically requests to be consulted on all projects "affecting our tribal homelands" including, but not limited to, ground disturbance. Chairperson Miranda-Ramirez concludes her April 22, 2017 letter by requesting a meeting with the City of Salinas to begin the consultation process. The tribal consultation records, along with the comment letter received, is included in **Appendix A** of the Final EIR.

It is not anticipated that ground disturbing activities would result in impacts to historical resources given that none are believed to be present. However, as with most projects in California that involve ground disturbing activities, there is the potential for discovery of a previously unknown historical resource. Project implementation may cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5. The implementation of the following mitigation measure would ensure that this potential impact is reduced to a ***less than significant*** level **(see Mitigation Measure 3.3-1 below**).

The Natividad and Gabilan Creek corridors run through portions of the Plan Area. Waterways in the region (including creeks) have historically been areas of settlement for Native Americans; therefore, there exists the potential for undiscovered archeological resources to be identified during the development of the Plan Area. However, development of the Specific Plan Area would improve and restore the Natividad and Gabilan Creek corridors. The immediate area surrounding the waterways within the Plan Area (including these creeks) would be minimally developed, with Open Space (OS) and Park (P) land uses proposed along these corridors. A carefully planned park, open space, drainage, and supplemental detention and retention system would be implemented along these corridors.

It is not anticipated that ground disturbing activities would result in impacts to archaeological resources given that none are believed to be present. However, as with most projects in California that involve ground disturbing activities, there is the potential for discovery of a previously unknown archaeological resource. Project implementation may cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5. The implementation of Mitigation Measures 3.3-1 would ensure that this potential impact is reduced to a ***less than significant*** level.

The Monterey County General Plan Draft EIR (2007) included a review of known fossil localities conducted by paleontologists in 2001. Twelve fossil sites were identified as having outstanding scientific value. For the most part, the fossils at these 12 sites reflect the type of assemblages found throughout the county (microorganisms or invertebrates); however, each has special characteristics that make it unique or rare, or in some way provide important stratigraphic or historic information. None of the 12 identified high value sites are located on or near the Specific Plan Area. Additionally, the Salinas General Plan Final EIR (2002) does not identify any high value sites in the Specific Plan Area or in the City as a whole.

However, unknown important paleontological resources have the potential to occur within the planning area including the undeveloped future growth areas, which include the Specific Plan Area. The construction of new development would involve grading and other earthwork that can disturb important fossils. Therefore, project implementation may directly or indirectly destroy a unique paleontological resource. This impact is considered potentially significant. Implementation of the following mitigation measures would reduce the impact to unknown or otherwise undiscovered paleontological resources to a ***less than significant*** level **(see Mitigation Measure 3.3-2 below).**

No human remains or known burial sites were found during field surveys for the CASP. Additionally, there are no human remains or known burial sites that have been identified in the Specific Plan Area on maps and files maintained by the Northwest Information Center (NWIC). There have been four previous cultural resource studies that examined approximately three-quarters of the Specific Plan Area and no human remains or known burial sites were documented. The Monterey County Historic Property Data File Directory and National Register of Historic Resources do not list any human remains or known burial sites in the Specific Plan Area.

It is not anticipated that ground disturbing activities would result in impacts to human remains or known burial sites given that none are believed to be present. However, as with most projects in California that involve ground disturbing activities, there is the potential for discovery of previously unknown human remains or known burial sites. Project implementation may disturb human remains, including those interred outside of formal cemeteries. The implementation of the following mitigation measure would ensure that this potential impact is reduced to a ***less than significant*** level **(see Mitigation Measure 3.3-3 below).**

Early consultation with the culturally and traditionally affiliated Native American Tribes was initiated in early 2017. The Ohlone/Coastanoan-Esselen Nation (a historically documented previously recognized tribe in the Plan Area) provided a comment letter on April 22, 2017, objecting to any disturbance of human remains and/or cultural items that may be discovered during the development of the Plan Area. No tribal cultural resources have been identified within or adjacent to the Specific Plan Area. Additionally, as described under Impacts 3.3-1 through 3.3-3 (above), with incorporation of Mitigation Measures 3.3-1 through 3.3-3, the proposed project would not generate a significant adverse impact to historical, archaeological, or paleontological resources, or cause a significant disturbance to any human remains. With implementation of these mitigation measures, the proposed project would not cause a substantial adverse change to the significance of a tribal cultural resource. This is a ***less than significant*** impact.

The Salinas General Plan Final Program EIR includes mitigation measures that would reduce impacts to cultural resources (Mitigation Measures CR1, CR2, and CR3). These mitigation measures were found to reduce the potentially significant impact to paleontological resources to a less than significant level in the Salinas General Plan Final Program EIR. Additionally, it was found that these mitigation measures may not reduce the potentially significant impacts to historic and archaeological resources under some circumstances where they would not apply to the approval (i.e. ministerial projects/non-discretionary). It is noted that the General Plan, as a broad citywide legislative document, did not require parcel-level cultural resource analysis. Such a site-specific analysis was prepared for the CASP, however; and it did not find any physical or recorded evidence that there are any cultural resources within the Specific Plan Area.

While there are extensive documented cultural resources in Salinas and unincorporated Monterey County, there are no cultural resources that were found during field surveys for the CASP. Additionally, there are no cultural resources that have been identified in the Specific Plan Area on maps and files maintained by the Northwest Information Center (NWIC). There have been four previous cultural resource studies that examined approximately three-quarters of the Specific Plan Area and no cultural resources were documented. The Monterey County Historic Property Data File Directory and National Register of Historic Resources do not list any cultural resources in the Specific Plan Area. Furthermore, mitigation measures incorporated into the CASP EIR would require the proposed project to evaluate any cultural resources discovered during construction activities. Any significant discoveries during construction would be required to be preserved in place or mitigated through relocation or documentation; and the project is not anticipated to considerably contribute to a significant reduction in cultural resources.

Absent any evidence of a cultural resource in the Specific Plan Area, the potential for an impact is considered relatively low. Mitigation measures are presented that would require practices that would alleviate any impact associated with a cultural find during construction activities that was previously unknown. It is noted that there has been no record of a cultural resource being uncovered during the regular ground disturbance

associated with the agricultural activities over many decades (i.e., tilling/deep ripping). Given this fact, the probability of uncovering a cultural resource during construction is considered relatively low.

However, the cumulative setting is regional in scope and includes extensive cultural sites. Although the Specific Plan Area has been evaluated and has not been found to contain any evidence of cultural resources implementation of the proposed project, when taken together with all past, present, and probable future projects (inclusive of buildout of the various General Plans within Monterey County), has the potential to cause a significant cumulative impact. Even so, the incremental contribution of the proposed project to this larger significant cumulative impact would not be cumulatively considerable. Thus, implementation of the proposed project would have a ***less than cumulatively considerable*** incremental contribution to the significant cumulative impacts on cultural resources.

Applicable Mitigation from Prior EIR (if any)

The following Mitigation Measures for Cultural Resources stated in the adopted Final Mitigation Monitoring and Reporting Program from the Final Environmental Impact Report for the Salinas Central Area Specific Plan dated November 2020 shall be required for any future development in the project area:

Mitigation Measure 3.3-1: Grading and/or building permits and plans for development in the project area shall note the following: In the event that evidence of archaeological or historical features or deposits (e.g., ceramic shard, trash scatters, lithic scatters) are uncovered (discovered) during excavation and/or grading, all work shall stop in the area of the find until an appropriate avoidance or data recovery program can be developed and implemented by a qualified archaeologist. This archaeologist shall determine whether the uncovered deposits or features qualify as either "historical resources" within the meaning of CEQA Guidelines section 15064.5, subdivision (a), "unique archaeological resources" as defined in Public Resources Code section 21083.2, subdivision (g), or "tribal cultural resources," as defined in Public Resources Code section 21074. If historical resources, unique archaeological resources, or tribal cultural resources are present, the project proponent shall preserve any such resources in place if feasible as determined by the City Planner and/or implement any other feasible mitigation measures identified by the archaeologist and approved and imposed by the City. In assessing whether avoidance is feasible, the City Planner shall consider project design, logistics, and cost considerations. All costs associated with the City's Planner's determination of project design, logistics and cost considerations shall be borne by the developer/applicant. Avoidance is infeasible where it would preclude the construction of important structures or infrastructure or require exorbitant expenditures. Recommended mitigation measures shall be reviewed by the City Planner and shall be approved if feasible in light of project design, logistics, and cost considerations and, if approved, shall be implemented and completed prior to commencing further work for which grading or building permits were issued, unless otherwise directed by the City Planner.

Data recovery, including photo documentation, excavation and recovery, laboratory analysis, etc., shall be an option if preservation in place is infeasible. Where resources have been determined to be "unique archaeological resources" but not "historical resources" or "tribal cultural resources," the project proponent's obligations shall be limited as set forth in Public Resources Code section 21083.2, subdivisions (d), (e), and (f). Grading/building permits and plans shall note this measure.

Mitigation Measure 3.3-2: Grading and/or building permits and plans for development in the project area shall note the following: If paleontological resources are discovered during the course of construction, work shall be halted immediately within 50 meters (165 feet) of the discovery, the City of Salinas shall be notified, and a qualified paleontologist shall be retained to determine the significance of the discovery. If the paleontological resource is considered significant, it should be excavated by a qualified paleontologist and given to a local agency, State University, or other applicable institution, where the resource could be curated and displayed for public education purposes.

Mitigation Measure 3.3-3*:* Grading and/or building permits and plans for development in the project area shall note the following: If human remains are found during construction within the Specific Plan Area, or at off-site infrastructure improvement locations, there shall be no further excavation or disturbance of the area of the find or any nearby area reasonably suspected to overlie adjacent human remains until a qualified archeological monitor and the coroner of Monterey County are contacted. If it is determined that the remains are Native American, the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent (MLD) from the deceased Native American. The MLD may then make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and associated grave goods as provided in Public Resources Code section 5097.98. The landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further disturbance if:

a) The Native American Heritage Commission is unable to identify a MLD or the MLD failed to make a recommendation within 48 hours after being notified by the commission;
b) The descendent identified fails to make a recommendation; or
c) The landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
19. UTILITIES & SERVICE SYSTEMS. *Would the project:*					
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒	☐
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒	☐
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has the adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒	☐
(d) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local	☐	☐	☐	☒	☐

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
infrastructure, or otherwise impact the attainment of solid waste reduction goals? (e) Comply with federal, state, and local management and reduction statues and regulations related to solid waste?	☐	☐	☐	☒	☐

Discussion

Overall conclusion: The CASP EIR provides project-level detail with respect to the proposed tentative subdivision map's effects on utility systems. The tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address the impacts of the proposed tentative subdivision map on utility systems.

The CASP Draft EIR on Pages 3.11-1 through 3.11-72, describes the regulatory setting, impacts associated with wastewater services, water services, storm drainage, and solid waste disposal that are likely to result from project implementation, and measures to reduce potential impacts to wastewater, water supplies, storm drainage, and solid waste facilities.

Responses a), b), and c): Currently, there are no collection lines located within the Plan Area. The City of Salinas operates and maintains sewer collection facilities and maintenance within the City. The City's Wastewater Division of the Public Works Department under the direction of the Public Works Director is responsible for operation and maintenance of the City's sanitary sewer collection system. The City's Wastewater Manager is the lead person to plan and implement collection operations and maintenance. Per the Draft EIR, as of 2019, City staffing for operation and maintenance of the sanitary sewer system includes 10.0 full time equivalent (FTE) employees. Additionally, as of 2019, the Wastewater Division had 9.0 FTE additional staff that is

funded through storm sewer, industrial waste or street sweeping programs (City of Salinas, 2019).

The City of Salinas Sanitary Sewer Master Plan (2011) projects new development would increase the total wastewater discharge to an average dry weather flow up to a maximum of approximately 22.1 MGD at full build-out of the entire City Sphere of Influence. Wastewater generated by the CASP is estimated to be approximately 1.18 MGD, as described in Table 3.11-4, of the Draft EIR.

Impact 3.11-1 of the Draft EIR: The proposed project has the potential to result in a determination by the wastewater treatment and/or collection provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments (Less than Significant)

Wastewater generated within the Plan Area would be conveyed by the City of Salinas wastewater conveyance system to Monterey One Water (M1W) Regional Treatment Plant. M1W, a regional agency, owns and operates the M1W Treatment Plant. The wastewater treatment system treats domestic wastewater from residential and commercial sources. Waste Discharge Requirements (WDRs) Order No. R3-2018-0017 provides waste discharge requirements for M1W Treatment Plant, and a supply capacity of up to 29.6 MGD.

The Waste Discharge Requirements (WDRs) Order No. R3-2018-0017 includes: Discharge Prohibitions, Discharge Specifications, Effluent Limitations, Land Discharge Specifications, Reclamation Specifications, Surface Water Limitations, and Groundwater Limitations. This Order was adopted on May 22, 2014. M1W Treatment Plant is currently in compliance with the WDR requirements of Order No. R3-2018-0017, NPDES No. CA0048551. Implementation of Central Area Specific Plan would be covered under the existing capacity (as discussed below) and would not exceed the wastewater discharge requirements in this Order.

The City of Salinas Sanitary Sewer Master Plan projects new development would increase the total wastewater discharge to an average dry weather flow to a maximum of approximately 22.1 MGD at full build-out of the entire City Sphere of Influence. The estimated wastewater discharge for full buildout of the CASP would be approximately 1.18 MGD.

The Central Area Specific Plan would require wastewater collection and treatment services. The existing wastewater collection system is owned and operated by the City of Salinas. The City maintains approximately 270 miles of sanitary sewer collection system pipeline and 11 Sanitary Sewer Lift Stations. Flow in the City system is primarily by gravity, with low-head pump stations located at low spots due to the City's flat topography.

Sanitary wastewater produced in the City is conveyed through the City's conveyance facilities to the former City treatment plant site, known as "TP1". The plant closed when M1W Treatment Plant began service. From that location it is pumped via M1W's Salinas Pump Station and Salinas Interceptor pipeline to the M1W Treatment Plant in Marina. The primary components of the City's collection system include four trunk lines, 11 pump stations, and a system of smaller collection facilities that convey wastewater from individual homes, businesses, and other developed uses to the trunk lines and pump stations.

The sewer system for the Specific Plan Area will consist of 8-inch to 12-inch pipes, designed in accordance with the City of Salinas design standards at the time of final design. The sewer mains will be public streets and private alleys with public service easements. The sewer mains will connect to the existing City of Salinas sewer system at two locations: the 10-inch sewer in Independence Boulevard, and the 18-inch sewer near Constitution Boulevard.

The City would maintain the sewer collection system once constructed. The sewer collection and conveyance system would entail a minimum of four creek crossings; one for Gabilan Creek and three for Natividad Creek and its tributaries. These creek crossings could require the use of siphons. The technical memorandum prepared by CDM Consultants suggests directing approximately 1.1 MGD of flow to the existing 24-inch sewer in McKinnon Drive (CDM Consultants, 2007). This would require the construction of approximately 6,000 linear feet (LF) of offsite sewer pipe in Boronda Road from McKinnon Drive to Natividad Road and trigger the need for a pump station and 2,000 LF of force main in Boronda Road from Independence Boulevard to Natividad Road. Final design of the sewer system collection and conveyance system will be determined by the City, in coordination with CDM Consultants, based on potential impacts and a cost/benefit analysis.

The M1W Treatment Plant provides regional wastewater treatment, disposal, and reclamation facilities for the cities of Monterey, Pacific Grove, Del Rey Oaks, Sand City, Marina, and Salinas; the Seaside County Sanitation District; the Castroville, Moss Landing and Boronda Community Services Districts; and Fort Ord.

All sanitary wastewater collected by the City's system flows to the M1W Salinas Pump Station, located at the southwestern boundary of the City. The M1W Salinas Pump Station conveys sanitary wastewater discharges to the regional treatment facility via a M1W force main.

The Regional Treatment Plant, owned and operated by M1W, would serve the proposed project. The Waste Discharge Requirements (WDRs) Order No. R3-2018-0017 allows M1W Regional Treatment Plant to accept up to 29.6 MGD. The M1W Treatment Plan has a design capacity for up to 29.6 MGD. Current demand is approximately 16 MGD (as provided by M1W Treatment Plant Engineer Jennifer Gonzalez).

CONCLUSION

The Central Area Specific Plan could increase the amount of wastewater requiring treatment at the M1W Treatment Plant, by generating additional wastewater within the Specific Plan Area. The Waste Discharge Requirements (WDRs) Order No. R3-2018-0017 allows M1W Treatment Plant to accept up to 29.6 MGD. Given a current demand of approximately 16 MGD, the M1W Treatment Plant currently has an additional capacity of approximately 11 MGD; given 1.18 MGD generated by the project (and peak flows of approximately 1.75 MGD), there is sufficient plant capacity. This is a ***less than significant*** impact.

Impact 3.11-2 of the Draft EIR: The proposed project has the potential to require or result in the relocation or construction of new or expanded wastewater treatment or collection facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects (Less than Significant)

The Central Area Specific Plan project does not trigger a need to expand or relocate the M1W Treatment Plant. There would be a network of sewer collection infrastructure installed throughout the Plan Area to serve the Central Area Specific Plan. The sewer system for the Specific Plan Area will consist of 8-inch to 12-inch pipes, designed in accordance with the City of Salinas design standards at the time of final design. The sewer mains will be public streets and private alleys with public service easements. The sewer mains will connect to the existing City of Salinas sewer system at two locations: the 10-inch sewer in Independence Boulevard, and the 18-inch sewer near Constitution Boulevard.

CONCLUSION

The potential for environmental impacts associated with the installation of the wastewater collection system, and all construction activities within the Plan Area, are addressed throughout the CASP EIR. In some cases, the direct and indirect impacts are potentially significant and warrant mitigation measures, while in other cases there are significant and unavoidable impacts. The installation of the wastewater collection system for the Central Area Specific Plan project does not cause any impacts above what is already analyzed and disclosed for each environmental topic in the CASP EIR. This is a ***less than significant*** impact relative to this environmental question.

Impact 3.11-3 of the Draft EIR: Cumulative impact on wastewater utilities (Less than Significant and Less than Cumulatively Considerable)

The geographic boundary for cumulative wastewater impacts is development within the wastewater collection and treatment service area of M1W. The M1W service area includes: the cities of Pacific Grove, Monterey, Seaside, Del Rey Oaks, Marina, Salinas, and Castroville; Moss Landing (within unincorporated Monterey County); and farmlands

in the Castroville area that received recycled water produced by M1W. This geographic boundary was chosen because it contains the area that has the potential to cause a cumulative wastewater impact to M1W facilities (including the M1W Treatment Plant) and/or City of Salinas sewer facilities.

The proposed project would not exceed the RWQCB wastewater treatment requirements or cause a significant impact related to the construction of new wastewater treatment or collection facilities or expansion of existing facilities. There is sufficient capacity at the M1W Regional Treatment Plant to serve the proposed project.

The City requires each project applicant to secure adequate wastewater treatment capacity. The project applicant(s) are required to provide the City with documentation of a will-serve or other commitment from M1W at the time of development. Additionally, the project applicant(s) will be required to install/connect and/or fund the necessary collection/transmission infrastructure to ensure the appropriate treatment of all wastewater.

The amount of wastewater that the M1W Treatment Plant receives and treats has been decreasing over time. It is projected that wastewater flows to the M1W Treatment Plan will continue to decrease until approximately the year 2030, when wastewater flows are projected to between 17.1 and 19.2 MGD. Wastewater flows are projected to increase after 2030 and may range between 22.7 and 24.3 MGD by the year 2055, or 77 percent to 82 percent of regional treatment plant design capacity (Brezack & Associates Planning, 2014). Wastewater demand for the buildout of the most recent version of the Economic Development Element is estimated to add approximately 0.65 MGD to this total, which would increase the total cumulative demand at the Regional Treatment Plant to approximately 25.0 MGD by 2055, under the worst-case scenario modelled. The M1W plant is designed and constructed to handle 29.6 MGD; which is more than 4 MGD than the project 2055 demand, under the worst case scenario modelled. The 1.18 MGD expected to be generated by full buildout of the CASP would thereby leave approximately 3.4 MGD available in 2055, under the worst-case scenario modelled. Moreover, it is more than likely that this represents an overestimate of cumulative wastewater demand, given that this estimate utilizes the higher end of the range of projected wastewater at the M1W Regional Treatment Plant in the future. Additionally, buildout of the Specific Plan is expected to occur over an approximately 20 to 30 year timeframe; therefore, buildout is expected to occur no later than approximately 2050 (at latest). Therefore, using the year 2055 as the analysis year serves as a conservative date for buildout of the CASP. Therefore, this would result in *a* ***less than significant cumulative*** *impact* and ***less than cumulatively considerable*** incremental impact on wastewater utilities.

The Plan Area was annexed into the City of Salinas on September 8, 2008 (with the exception of the Settrini/Garcia/Igaz properties, which have not yet been annexed by the City). The Salinas District of California Water Service ("Cal Water Salinas District" or "Cal Water") and Alisal Water Corporation ("ALCO") provide potable water service to the

City of Salinas, and are prepared to serve the Specific Plan Area. The current division of service areas splits the Specific Plan Area in half along the PG&E tower line with ALCO serving the eastern half and Cal Water serving the western half. Both ALCO and Cal Water have produced Water Service Assessments (WSA) per the requirements of Senate Bill 610 (Stats. 2001, ch. 643) (Wat Code, § 10910 et seq; see also CEQA Guidelines, § 15155), and have issued will-serve letters for the project. The California Public Utilities Commission (CPUC) has approved the extension of services to the project. The project site is served by ALCO.

Two project-specific WSA's have been prepared to evaluate the City's current and future water demands (including those of the Plan Area) against water supplies to ensure that adequate water is, or will be, available to accommodate the Central Area Specific Plan. Both ALCO and Cal Water have produced Water Supply Assessments (WSA) per the requirements of Senate Bill 610 (see **Appendix G** of the Draft EIR). The studies conclude that adequate water supplies are available to serve the Central Area Specific Plan.

Additionally, ALCO and Cal Water have submitted a "Will Serve" letters indicating that they can provide water service to the proposed Specific Plan Area. Separately, ALCO issued a "Can and Will Serve" letter on March 27, 2020 indicating that they will provide water service to the Specific Plan Area with their planned system upgrades, and confirmed on March 30, 2020 that the information in their WSA is still valid.

ALCO obtains all its water from groundwater. Alco has been using water from the Eastside Aquifer Subbasin since 1932 to supply water to its Salinas customers. ALCO currently has nine water wells, six of which are in active service and three of which have been designated as standby sources by SWRCB and will be returned to active status after the addition of treatment or blending facilities for arsenic. ALCO currently has two new water sources already drilled and test-pumped and will be adding this source to the system in the near future. The locations of ALCO's existing water sources as well as those wells that are being added in the future are dispersed throughout ALCO's service area. As ALCO adds additional customers and the total water system demand increases through developments, Alco will also add additional water well sources as necessitated by that increased total water system demand. ALCO 's existing nine sources, as well as those new sources that are drilled and/or are scheduled to be drilled, draw water from both the 400-foot aquifer and the deep aquifer (the conditions of which are discussed below under the heading, *Groundwater Basin Overdraft*). Only one well, out of all of ALCO's existing well sources and the wells currently being developed, draws water from the 400-foot aquifer only.

ALCO has installed a 30" water main which runs along East Boronda Road and then up the center of the Specific Plan Area adjacent to the existing tower line easement. ALCO has approximately 205,000 gallons of existing storage, which is not adequate for peak hour and fire flow demands. However, ALCO is planning to construct a five million gallon storage tank to provide additional capacity during periods of high demand. It is

anticipated that this five million gallon storage tank will be installed once the Central Area Specific Plan begins to develop.

As shown in the Draft EIR, the production capacities ALCO's of existing and future wells is expected to be approximately 15,321 MG/year in 2034, which is equivalent to approximately 47,018 AFY. With the additional wells expected to be developed by ALCO in future years, ALCO anticipates its total water supply will exceed the total annual water system demand (i.e. of the combined demand of its existing system plus the portion of the Specific Plan Area served by ALCO) by approximately 13,183.72 MG/year in 2034 (ALCO, 2014).

All of ALCO's major well sources are equipped with an onsite standby generator with an automatic transfer switch, and ALCO also has portable standby generators that can be moved to any water facility in need of power. Additionally, all future well and pumping facilities will be designed to be equipped with an onsite standby generator.

ALCO's existing wells are located throughout the water system and rely on different parts of the power grid, therefore it is less likely that multiple sources would be affected by power outages. Future wells will be similarly disbursed throughout the water system to decrease the impacts of localized power outages.

Depending upon system demand requirements, ALCO has the ability to add additional wells to the water system. The timeline of the well installations can be modified dependent upon demand or if necessitated by contamination or loss of a well source.

Potential events that could cause ALCO to accelerate its well construction schedule would be loss of a well due to collapse or inability to use the well due to changes in its water quality or changes in water quality standards. If any of ALCO's existing water sources were to be lost, either to collapse or to potential contamination or changes in water quality standards, it would be necessary to replace the well source. ALCO already has plans for construction of six new wells, and, ALCO also has the benefit of already possessing ten well lots in its service area in the event that any of its existing sources ever need to be replaced for any reason.

While ALCO does not forecast its water sources to become contaminated, that potential is always a consideration for any water system. Further, state and/or federal water quality standards may be changed such that a source that is currently in compliance with all standards may be out of compliance after the implementation of any new standards. ALCO deals with these issues by diversifying source locations in the service area, so that any contamination, if it were to occur, is only likely to affect a minimal number of sources and not all of the water sources at the same time.

If contamination does occur, having diversified sources allows ALCO to isolate the affected sources and evaluate whether:

- To discontinue use of the sources without replacing them;
- To discontinue use of the sources and replace them with new sources;
- To blend the sources with sources meeting the standards;
- To treat the sources for the contaminant(s) found.

Overall, as described in the *ALCO Water Service Water Service Assessment*, ALCO has sufficient supplies to serve the proposed site during multiple dry years (ALCO, 2014).

Groundwater is currently the dominant source of water supply for agricultural and municipal water demands in the Salinas Valley. Agricultural water use represents approximately 90 percent of all water used in the Salinas Valley. Urban water use has been increasing. Increases in urban water use, particularly on non-irrigated lands in the northern portion of the Salinas Valley, will place additional pressure on groundwater pumping (Brown & Caldwell 2016, pp. 2-4 – 2-5). The Specific Plan Area is located on irrigated agricultural land. Hence, water demand from the project with urban uses will replace water demand for irrigation.

Much of the water supply for Salinas is extracted from the Pressure Subarea, while ALCO extracts its groundwater from the East Side Subarea. The Pressure Area is a region of gradually declining groundwater elevations and is characterized by three confined aquifer systems, overlain and separated by thick clay layers that act as aquicludes. These aquifers are named for their relative depths, and are known as the "180-foot", the "400-foot", and "900-foot" aquifers, respectively. The groundwater level in the East Side Area is declining more rapidly than any other area in the groundwater basin. The East Side Area is comprised of unconfined, randomly scattered water bearing strata (Cal Water, 2015).

Impact 3.11-4 of the Draft EIR: The proposed project has the potential to require the relocation or construction of new water treatment facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects (Less than Significant)

The provision of public services and the construction of onsite and offsite infrastructure improvements will be required to accommodate development proposed by the Central Area Specific Plan. The proposed water distribution systems for the Specific Plan for both Cal Water and ALCO would consist of 8-inch to 18-inch American Water Works Association (AWWA) C900 or C905 PVC or high-density polyethylene (HDPE) pipe. It is expected that no ductile iron or steel pipe will be used due to highly corrosive onsite soils. ALCO has already installed a 30" water main which runs along E. Boronda Road and then up the center of the Specific Plan Area, adjacent to the existing tower line easement. New water mains would be installed throughout the Plan Area, as provided in the Central Area Specific Plan.

There are anticipated to be three new groundwater wells that would be developed on-site, including two new Cal Water wells, and one new ALCO well, although the number of wells would be subject to final determination by the City of Salinas in coordination with the water service providers. Well locations are chosen on the basis of water quality and potential production capabilities. All well and pumping station facilities within the Specific Plan area will be designed to blend with adjacent uses through the use of architectural features and landscaping, and would be screened by a masonry wall. Final well design is subject to the approval of the City Engineer and City Planner, and all improvements will be developed according to City standards and specifications.

The Central Area Specific Plan would require extension of offsite water infrastructure to the Plan Area for potable water. Offsite improvements include connection to the existing facilities at roadways adjacent to the Specific Plan Area, including along Hemingway Drive, Boronda Road, Constitution Boulevard, and Independence Drive. Additionally, ALCO anticipates the need for three booster pumping stations, since they do not have a water supply source close to the site. All offsite water piping improvements will be in or adjacent to existing roadways, thereby limiting new environmental impacts. ALCO also anticipates the need to construct a five million gallon storage tank to provide additional capacity during periods of high demand, located approximately one mile north of the Specific Plan Area, which is described in further detail below.

The proposed on-site water distribution system would be looped to maintain water quality and would be sized to meet the maximum day demand plus fire flow. Cal Water anticipates it will have sufficient capacity to provide adequate water system flow and pressure for fire demand, without requiring construction of new off-site infrastructure. However, ALCO has approximately 205,000 gallons of existing storage, which is not currently adequate to achieve the required peak hour and fire flow demands for the CASP. Therefore, ALCO is planning to construct a five million gallon storage tank approximately one mile north of the Specific Plan Area, which would be installed once the Central Area Specific Plan begins to develop. Fire flow will require a minimum system pressure of 20 pounds per square inch (psi) at maximum day demand plus fire flow. The fire flow requirement for the Central Area Specific Plan for residences is 1,500 gallons per minute (gpm), and for commercial uses is 2,500 gpm, for a minimum of two hours. Under peak day demand, the system would deliver the required flows with a minimum of 40 pounds per square inch (psi) residual pressure. The water service purveyors are required to meet these fire flow requirements. The City of Salinas will conduct fire flow testing within the Specific Plan Area to ensure adequate water system flow and pressure.

CONCLUSION

Neither the CASP as a whole nor the proposed tentative subdivision map would require construction or relation of new water treatment facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. The water infrastructure is sized to meet the demand within the Plan Area. All

offsite improvements are to be placed in or adjacent to existing streets to minimize potential impacts, with the exception of the ALCO five million gallon storage tank, which would not cause any new significant environmental impacts. The Central Area Specific Plan would require the construction of new wells within the Specific Plan Area, and the installation of new booster pumping stations. The wells and booster pumping stations would be designed to ensure that they do not induce growth beyond what is anticipated by the Central Area Specific Plan. Additionally, it is not anticipated that relocation of existing water treatment facilities would occur due to development of the proposed project. Implementation of the Central Area Specific Plan would have a ***less than significant*** impact relative to this topic.

Impact 3.11-5 of the Draft EIR: The proposed project has the potential to have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years (Less than Significant)

The projected water demand for the CASP is based on the calculations described in the WSA developed by Yarne & Associates for the California Water Service Salinas District (Cal Water Salinas District) for the Cal Water portion of the Plan Area, the WSA developed by ALCO Water Service for the ALCO portion of the Plan Area, and the most recent calculations available for the Specific Plan Area based on project size.

As shown in the Draft EIR, the production capacities ALCO's of existing and future wells is expected to be approximately 15,321 MG/year in 2034, which is equivalent to approximately 47,018 AFY. With the additional wells expected to be developed by ALCO in future years, ALCO anticipates its total water supply will exceed the total annual water system demand (i.e. of the combined demand of its existing system plus the portion of the Specific Plan Area served by ALCO) by approximately 13,183.72 MG/year in 2034 (ALCO, 2014).9 ALCO also anticipated sufficient water supply through to 2040, including during multiple dry years.

All of ALCO's major well sources are equipped with an onsite standby generator with an automatic transfer switch, and ALCO also has portable standby generators that can be moved to any water facility in need of power. Additionally, all future well and pumping facilities will be designed to be equipped with an onsite standby generator. ALCO's existing wells are located throughout the water system and rely on different parts of the power grid, therefore it is less likely that multiple sources would be affected by power outages. Future wells will be similarly disbursed throughout the water system to decrease the impacts of localized power outages.

Depending upon system demand requirements, ALCO has the ability to add additional wells to the water system. The timeline of the well installations can be modified dependent upon demand or if necessitated by contamination or loss of a well source. Overall, as described in the *ALCO Water Service Water Service Assessment*, ALCO

currently has sufficient supplies to serve the proposed site during multiple dry years (ALCO, 2014).

The Central Area Specific Plan proposes to construct three wells, with well locations are chosen on the basis of water quality and potential production capabilities. The new wells, in addition to the existing water capacity as provided by Cal Water Salinas District and ALCO, would ensure that the CASP and the proposed tentative subdivision map would have sufficient water supplies from existing entitlements and resources. Therefore, buildout of the Central Area Specific Plan would result in a ***less than significant*** impact relative to the potential of the project to have insufficient water supplies from existing entitlements and resources.

CONCLUSION

Water supplies are sufficient to meet the City's existing and projected future potable water demands, including those future water demands associated with the Central Area Specific Plan, to the year 2035 under all hydrologic conditions. The new groundwater wells would provide adequate groundwater for the proposed project. Additionally, the Cal Water Salinas District and ALCO have sufficient water supply throughout its service area to serve the proposed project, even during the third year of a multi-year drought, and even if the proposed project's groundwater wells proved to not be sufficient to serve the entire Plan Area. Moreover, the development of the Central Area Specific Plan would reduce consumption of groundwater (equivalent to increasing groundwater storage), when compared to the existing agricultural uses; this would also have the effect of reducing the potential for seawater intrusion into the groundwater basin, when compared to the existing agricultural uses. Therefore, overall, buildout of the Central Area Specific Plan would result in a ***less than significant*** impact relative to this topic.

Impact 3.11-6: Cumulative Impact on Water Utilities (Less than Significant and Less than Cumulatively Considerable)

The cumulative context for the analysis of cumulative impacts on water utilities is the Salinas Valley Groundwater Basin. This is the geographic area that is reasonably expected to be affected by the use of water utilities within the Plan Area. Water demand from past and present development and from agricultural production activities within the boundary of the groundwater basin has contributed to groundwater overdraft conditions - a significant cumulative impact. Future urban development within the groundwater basin has potential to exacerbate overdraft conditions. However, where new urban development occurs on land in active agricultural use, the potential exists for urban uses to reduce demand for groundwater relative to agricultural uses, as urban uses often demand less water than is required for agricultural irrigation.

In addition to existing agricultural irrigation having contributed to groundwater overdraft, recent trends in the conversion of previously uncultivated land (e.g. range land and open space uses) to cultivated uses in Monterey County indicate that irrigation

groundwater demand could be increasing. Data from the California Department of Conservation's Farmland Mapping and Monitoring Program shows that from 2010-2012, approximately 376 acres of agricultural land in Monterey County was converted to urban use. However, during the same period, nearly ten times that amount of land, previously in other uses (e.g. range land, open space, etc.), was converted to agricultural use. During the 2012-2014 period, the acreage of land converted to agricultural use declined. Although no specific studies have been identified, it is possible that demand for groundwater has increased along with increased agricultural activity and that the increase is exacerbating groundwater overdraft conditions.

The proposed project would convert actively cultivated agricultural land to urban use. The proposed project would result in significantly less demand for groundwater than the demand agricultural operations located within the Plan Area, as provided under impact 3.11-5 in the CASP EIR. Though the proposed project represents a long-term commitment to continued use of groundwater supply, it would have a net beneficial cumulative effect reducing the magnitude of groundwater overdraft now occurring within the groundwater basin. A net beneficial effect, of course, is not cumulatively considerable.

As described in the Regulatory Setting in Section of the CASP EIR, by approximately 2040, conditions within the groundwater basin must be managed to ensure that the groundwater supply is stable. As such, by that time, overdraft conditions from cumulative demands on groundwater will have been addressed. The *Salinas Valley Groundwater Basin 180/400-Foot Aquifer Subbasin Groundwater Sustainability Plan* was adopted by the Salinas Valley Basin Groundwater Sustainability Agency Board of Directors on January 9, 2020. The GSP identifies projects and actions that provide stakeholders with options to reach sustainability of the underlying aquifer, including with regard to seawater intrusion. This approach is geared toward successful implementation by providing individual landowners and public entities flexibility in how they manage water and how the Subbasin achieves groundwater sustainability. All groundwater pumpers will be allowed to make individual decisions on how much groundwater they pump based on their perceived best interests. The set of projects and actions achieve the following objectives:

- Achieving groundwater sustainability by meeting Subbasin-specific SMC by 2040
- Creating equity between who benefits from projects and who pays for projects
- Establishing a source of funding for project implementation
- Providing incentives to constrain groundwater pumping within limits

The projects and actions included in the GSP are defined as a toolbox of options. The GSP demonstrates that sufficient options exist to reach sustainability. The projects and actions in the GSP include a water charges framework, management actions, specific projects prioritized for integrated management of the Salinas Valley, mitigation of overdraft, and other groundwater management activities. Specific details need to be

developed for stakeholders to determine which projects and actions to implement. The projects and management actions described in this GSP constitute an integrated management program for the entire Salinas Valley Groundwater Basin.

The specific projects identified include:

- Project Type 1: In-lieu recharge through direct delivery of water to replace groundwater pumping;
- Project Type 2: Direct recharge through recharge basins or wells (also commonly referred to as Managed Aquifer Recharge);
- Project Type 3: Indirect recharge through decreased evapotranspiration or increased infiltration; and
- Project Type 4: Hydraulic barrier to control seawater intrusion.

This GSP lays out a roadmap for addressing all of the activities needed for GSP implementation between 2020 and 2040, focusing mainly on the activities between 2020 and 2025.

Moreover, there would be sufficient water resources available to provide supply for buildout of the cumulative scenario, so that no significant cumulative effect on the overall water supply would result from the proposed project.

Under the combined General Plan/General Plan EIR and Economic Development Element buildout conditions, the City of Salinas would see an increased demand for water services. There are available water supplies to serve the proposed project from existing entitlements and resources. Additionally, the proposed project would not cause a significant impact related to the construction of the water system. Buildout of the General Plan and most recent City of Salinas Economic Development Element would add additional demand. Water demand for buildout of the entire City of Salinas Sphere of Influence (inclusive of the CASP and all existing development within the City of Salinas) would be approximately 43,309.3 AFY. Additionally, water demand for buildout of the Economic Development Element would require an additional approximately 1,972.3 AFY. Combined, the cumulative scenario would require a total of 45,281.6 AFY (as shown in Table 3.11-17, in the Draft EIR), which is within the available supply of 47,333 AFY expected by 2035 under multiple dry-year conditions. It should also be noted that this is likely an overestimate, given that increasing urban demand would displace some existing agricultural demand, which would result in ongoing net reductions that are not accounted for in these calculations. There would be sufficient water resources available to provide supply for buildout of the cumulative scenario, so that no significant cumulative effect on the overall water supply would result. Therefore, this would result in a ***less than significant cumulative*** *impact* and a ***less than cumulatively considerable*** impact on water utilities.

Impact 3.11-7 of the Draft EIR: The proposed project has the potential to require or result in the relocation of or construction of new or expanded stormwater

drainage facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects (Less than Significant)

Proposed project stormwater infrastructure would be developed on-site, with connections made to off-site existing storm drainpipes along existing rights-of-way (such as along East Boronda Road), with new storm drainpipe connections installed, as needed. Installation of storm drainage infrastructure (and associated grading) would occur during the construction phase of the proposed project. The proposed project would comply with Low Impact Development (LID) strategies, consistent with the City's NPDES permit and SWDS requirements. Grading operations are proposed to take place along Gabilan and Natividad creeks to restore them to a more natural meandering, well vegetated condition.

In general, the proposed grading and drainage in the Plan Area would maintain the existing shape and hydrologic properties of the existing Gabilan Creek and Natividad Creek drainage basins. This would be accomplished through the use of site/parcel based uniformly decentralized controls including LID strategies and Post Construction Best Management Practices (BMPs), supplemented, where infiltration is proven infeasible, by efficient onsite storm drain systems, supplemental detention and retention facilities, and enhancing the existing creek corridors.

The onsite storm drain system will consist of reinforced concrete or high-density polyethylene (HDPE) pipe designed in accordance with the latest City of Salinas design standards. The storm drain system will direct the runoff to the detention and retention facilities located along the edges of the Gabilan and Natividad Creek corridors. Detention and retention facilities are needed to mitigate for increases in peak runoff flow rate and runoff volume due to development. Water quality basins are needed to provide mitigation for increases in stormwater pollutants due to development.

A hydrologic analysis was prepared based on design criteria from the City of Salinas, Monterey County Water Resources Agency, and the Regional Water Quality Control Board. The potential hydrologic impacts to Carr Lake and the downstream reclamation ditch were also taken into account due to historical flooding issues. A de-silting basin will be required for Gabilan Creek, north of the future extension of Russell Road to minimize creek silting. The City would also need to condemn a parcel in Gabilan Creek north of Russell Road and design and construct a de-silting basin, and the City would need to remove the silt.

The construction of the new stormwater drainage facilities, which are associated with the proposed project, has the potential to cause environmental impacts. The potential for environmental impacts associated with the installation of the stormwater system, and all construction-related activities within the Specific Plan Area, are addressed throughout the CASP EIR. In some cases, the direct and indirect impacts are potentially significant and warrant mitigation measures, while in other cases there are significant

and unavoidable impacts. The installation of the stormwater system for the Central Area Specific Plan project does not cause any impacts above what is already analyzed and disclosed for each environmental topic in the CASP EIR. Relocation of existing stormwater facilities could also occur, but would not cause any environmental impact due to the limited scope of such activities (e.g. removal of existing agricultural sprinkler systems within the Specific Plan Area). This is a ***less than significant*** impact relative to this environmental question.

Impact 3.11-8 of the Draft EIR: Cumulative Impact on Stormwater Facilities (Less than Significant and Less than Cumulatively Considerable)

The cumulative context for the analysis of cumulative stormwater facilities is best addressed on a regional/watershed basis. Because water resources are highly interconnected, the cumulative setting is based on Monterey County, which is located in the Central Coast Hydrological Region. With respect to surface waters, runoff from the Specific Plan Area currently flows toward Gabilan Creek or Natividad Creek according to general overland flow pathways. Gabilan Creek flows into the Carr Lake basin, while Santa Rita Creek flows westward and enters the Reclamation Ditch near Castroville. Runoff downstream of the Specific Plan Area is conveyed through the ditch system either as flows in the creeks or into the City of Salinas storm drain system as defined in the City of Salinas Stormwater Master Plan.

As shown on Figure 3.6-3 of the Draft EIR, predicted flood conditions in the vicinity of the Specific Plan Area are shown on the Federal Emergency Management Agency's (FEMA's) Flood Insurance Rate Map (FIRM) panels 06053C0226G, 06053C0228G, and 06053C0230G. Gabilan Creek has been mapped and contains Regulatory Floodway and Special Flood Hazard Areas, Zone AE. Base Flood Elevations can be determined based the creek's Flood Insurance Study. The areas along Natividad Creek are within the one percent annual chance flood hazard area (100-year flood zone), Zone A. Zone A includes areas subject to inundation by the 1-percent-annual-chance flood event generally determined using approximate methodologies. Because detailed hydraulic analyses have not been performed, no Base Flood Elevations (BFEs) or flood depths are shown. Mandatory flood insurance purchase requirements and floodplain management standards apply. Additionally, portions of the western Specific Plan Area are within the 0.2 percent annual chance flood hazard area (500-year flood zone, Zone X). Flood conditions in Zone X ("Other Flooded Areas") are limited to less than one-foot depth or less than one acre during the 1-percent annual chance flood and/or are areas of 0.2-percent annual chance flood. The extent of flooding is naturally limited by existing topography. As noted previously, Natividad Creek traverses the eastern portion of the Specific Plan Area from north to south, and Gabilan Creek traverses the western portion of the Specific Plan Area from north to south.

The Central Area Specific Plan notes that the areas currently identified as flood hazard Zone AE on Gabilan Creek and Zone A on Natividad Creek would be restored to a more natural creek corridor, with detention/retention/water quality basins to be installed and

operated along the lateral boundaries of the corridor. Grading plans identify substantial in-fill in the flood hazard area shaded Zone X to prepare for mixed use development plans that will include housing. If grading is not properly carried out and housing were to be placed within these boundaries, those housing units could be subject to flooding.

Additionally, a series of detention/retention/water quality basins are proposed to be built along the lateral edges of restored creek corridors and may take up 50 to 66 percent of the proposed corridor space within existing Zones AE and A. Existing corridor sediments in flood Zones AE and A are primarily sandy materials with high infiltration capacities. The basins would function as stormwater and low flow receiving basins for all flows generated by the project area. Some basins could be overtopped and inundated during certain high flow runoff conditions by flows from upstream locations. If not properly designed, implemented, and maintained, a naturalized creek corridor that is largely bounded by detention/retention/water quality basins could result in flood flow impedance or redirection.

Future development projects in the area could result in additional discharges of stormwater during storm events. When combined, these future development projects could, in theory, could lead to an incremental increase in peak stormwater runoff and potential incremental increases in downstream flood elevations. However, in order to ensure that future development projects in the County do not increase downstream flood elevations, the City's Flood Damage Prevention Ordinance outlines the methods of reducing flood losses for subdivisions and other proposed developments via construction standards. The standards apply to all areas of special flood hazards within the jurisdiction of the City of Salinas, including the Central Area Specific Plan Area.

CONCLUSION

The Central Area Specific Plan includes an extensive system of on-site stormwater collection, treatment and retention facilities to accommodate the increased stormwater flows that would originate in the Specific Plan Area. Surface runoff from the area will be managed via detention/retention basins and flow reducing Best Management Practices (BMPs) to prevent local flooding within the Specific Plan Area. These features will also reduce peak flows from the Specific Plan Area to receiving creeks and storm drains to amounts less than such flows under existing conditions.

The proposed development, including water quality BMPs, and supplemental detention basins, and retention basins, is designed to minimize or eliminate increases in runoff from these new impervious surfaces entering surface water courses and storm drains. The stormwater runoff calculations completed as part of the Hydrology and Water Quality Technical Study (see **Appendix F of the Draft EIR**) indicate that peak runoff and total volume of runoff will be minimized by the proposed development storm drainage design which retains water to the maximum extent possible. Consequently, infiltration into the ground water aquifers will be maximized to the extent possible through the storm drainage design.

Future development in the area must be sited and designed in accordance with the City's flood regulations. Additionally, the CASP requires a letter of map revision (LOMR-F), detailed grading plans and calculations which show how the project would raise the land surface elevation above the base flood elevation, design basis reports for creek corridor restoration, calculations to address sediment transport issues, calculations to address basin embankment side slope failure, procedures that address basin issues associated with sedimentation, and procedures that address basin issues associated with embankment side slope failures. However, the proposed project is required to implement Mitigation Measures 3.6-7 through 3.6-14 (as provided in Section 3.6: Hydrology and Water Quality).

The proposed project, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Monterey County), would not be expected to cause any significant cumulative impacts given that mitigation measures require designs that ensure structures are outside the base flood elevation and that stormwater flows are maintained to prevent downstream flooding. The construction, maintenance, and operation of all stormwater facilities are not anticipated to cause substantial adverse impacts. The proposed project would not have cumulatively considerable impacts associated with stormwater facilities. Overall, implementation of the proposed project would have a ***less than significant cumulative*** *impact* and ***less than cumulatively considerable*** incremental contribution to impacts on stormwater facilities.

Responses d), and e): The City of Salinas is currently served by the Salinas Valley Solid Waste Authority (SVSWA), a joint powers agency representing the City of Salinas, the City of Gonzales, the City of Greenfield, the City of King, the City of Soledad, and the County of Monterey. Solid Waste generated within the Plan Area is collected by Republic Services of Salinas and delivered to SVSWA transfer stations, after which it is sent to the Johnson Canyon Landfill, which SVSWA owns and operates by contract. It is estimated that the landfill has 38-45 years of disposal capacity to meet the need of current jurisdiction served by the landfill. Solid waste would likely be delivered to the Johnson Canyon Landfill that is operated by the SVSWA, of which the City is a member, or to other facilities that may be developed or secured by the Salinas Valley Solid Waste Authority over time. Recyclable materials would be delivered to the SVSWA's Sun Street Transfer facility, where materials are segregated and recycled consistent with State solid waste diversion regulations.

Impact 3.11-9 of the Draft EIR: The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals (Less than Significant)

SVSWA is responsible for providing secure long-term solid waste disposal and resource recovery service in Salinas. The SVSWA is a joint powers agency made up of the

following local governments: Monterey County (eastern half of the unincorporated county), and the cities of Gonzales, Greenfield, King City, Salinas, and Soledad. Separately, Republic Services of Salinas is responsible for trash and recycling curbside pickup for residences and businesses in Salinas.

It is anticipated that Johnson Canyon Landfill would provide landfill capacity for the proposed project. Permitted maximum disposal at the Johnson Canyon Landfill is 1,574 tons per day. The total permitted capacity of the landfill is 13.8 million cubic yards. SVSWA indicates that, based upon diversion and other efforts, the actual life of the Johnson Canyon Landfill will be in the range of 38 - 45 years, with a permit cease operation date of December 21, 2055. The addition of the volume of solid waste associated with the Central Area Specific Plan to the landfill would not exceed the landfill's remaining capacity. Based on the waste generation factors provided by CalRecycle, the CASP is expected to generate approximately 44,171 pounds per day of solid waste upon full buildout, which is equivalent to 22.1 tons per day. Table 3.11-19 of the Draft EIR shows the estimated solid waste generation for the CASP. The SVSWA is responsible for ensuring that sufficient transfer facility capacity is available to serve the City of Salinas, including the proposed project.

CONCLUSION

All business and residents within the Central Area Specific Plan area, including those within the area covered by the proposed tentative subdivision map, would be required to comply with applicable State and local requirements including those pertaining to solid waste, construction waste diversion, and recycling. The City would coordinate development of the proposed project with SVSWA and Republic Services of Salinas. Furthermore, the addition of the volume of solid waste associated with the Central Area Specific Plan, approximately 22.1 tons per day at total buildout, would increase the total to the Johnson Canyon Landfill; however, this increase would not cause an exceedance of the landfill's remaining capacity. Therefore, the proposed project would not generate solid waste in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste goals, or exceed any State or local standards associated with solid waste. This is a ***less than significant*** impact.

Impact 3.11-10 of the Draft EIR: Cumulative Impact on Solid Waste Facilities (Less than Significant and Less than Cumulatively Considerable)

The cumulative context for cumulative impacts on solid waste facilities is the SVSWA service area. The SVSWA serves a large portion of the Salinas Valley, including the City of Salinas, all or part of the cities of Soledad, Gonzalez, Greenfield, King City, and unincorporated portions of Monterey County. Solid waste generated in the City is disposed at the Johnson Canyon Landfill. This landfill is permitted through the year 2040 and based upon SVSWA, has a likely lifespan for in excess of the permit. The permitted maximum disposal at the Johnson Canyon Landfill is 1,574 tons per day.

Currently, the average daily disposal is approximately 585 tons per day. The total permitted capacity of the landfill is 6.9 million cubic yards.

The SVSWA service area is expected to add numerous developments through 2055. The West Area Specific Plan, East Area Specific Plan, and the Economic Opportunity Areas (EOAs) identified in the Economic Development Element (EDE) are three such areas, located within the City of Salinas. These new areas would generate an estimated 75 to 100 tons per day at total buildout. Buildout of other communities within the Salinas Valley Solid Waste Authority' service area would also affect Johnson County Landfill. These jurisdictions within the region are likely to generate new sources of solid waste that would need to be processed at the landfill. The Johnson Canyon Landfill has the capacity to serve nearly three times as much waste per day as it does currently and will have sufficient capacity to serve communities within the SVSWA service area. Moreover, if the City of Salinas were to withdraw from the SVSWA (e.g. to form a new solid waste authority or to join a different solid waste district, which could necessitate the need to utilize a different landfill), CalRecycle would be responsible for ensuring that sufficient landfill capacity would be available to serve existing and future projects in Salinas (inclusive of the CASP), through its regular permitting requirements, and the City would maintain responsibility for providing adequate solid waste pickup services to residents and businesses. Implementation of the proposed project would have a less than significant cumulative impact relative to this environmental topic. Therefore, this would result in a ***less than significant*** and a ***less than cumulatively considerable*** impact on solid waste facilities.

Applicable Mitigation from Prior EIR (if any)

No mitigation is required. The General Mitigation Measures discussed above imposed duties on the City of Salinas, and not on individual property owners within the CASP.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable.

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
20. WILDFIRE. *If located in or near State responsibility*					

Issue	Impact				
	New Significant Impact or More Severe Impact Not Disclosed in Prior EIR	New Less Than Significant Impact or New Impact Less than Significant with Mitigation Incorporated	No Impact	Impact Fully Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
areas or lands classified as very high fire hazard severity zones, would the project:					
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒	☐
(b) 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?	☐	☐	☐	☒	☐
(c) 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?	☐	☐	☐	☒	☐
(d) 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?	☐	☐	☐	☒	☐

Discussion

Responses a), b), c), and d): As the CASP Draft EIR explained on Page 1.0-18, the CASP is not located in an area that is considered a high risk for wildfires. The proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Implementation of the proposed project would have a less than significant impact relative to this environmental topic. The project as proposed would not substantially impair an adopted emergency response plan or emergency evacuation plan. The project also would not require the installation and maintenance of infrastructure that may exacerbate fire risk or result in temporary of ongoing impacts to the environment.

Applicable Mitigation from Prior EIR (if any)

No mitigation is required. The General Mitigation Measures discussed above imposed duties on the City of Salinas, and not on individual property owners within the CASP.

Relevant Uniformly Applied Development Policies or Standards (if any)

Not applicable

Mandatory Findings of Significance	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applied Development Policies or Standards
1. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒	☐
2. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? *("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).*	☐	☐	☐	☒	☐
3. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒	☐

Overall conclusion: The CASP EIR provides project-level detail with respect to all of the topics identified immediately above, which generally fall under the broader categories of (i) impacts to biological resources, (ii) impacts to cultural and tribal cultural resources, (iii) cumulative impacts under all general impact categories, and (iv) health-related impacts associated with air pollutant emissions, water pollution, and exposure to hazards and hazardous materials. As explained above, the CASP EIR includes project-level analysis on all such topics, and in many instances provides comprehensive mitigation measures addressing impacts that are either significant prior to mitigation or significant and unavoidable even with mitigation. The proposed tentative map would create new legal parcels but would not directly authorize any development that would require future discretionary approvals from the City. Those would have to be obtained separately at a later point in time. No additional site-specific environmental analysis is required to fully address impacts of the proposed tentative subdivision map related to the checklist questions set forth immediately above.

Attachments:

1. Vicinity Map for Tentative Map 2021-001
2. Title Sheet (Sheet 1)
3. Existing Conditions (Sheet 2)
4. Street Sections (Sheet 3)
5. Street Sections (Sheet 4)
6. Details (Sheet 5)
7. Central Area Special Plan (CASP) Density Conformance (Sheet 6)
8. Lotting Plan (Sheet 7)
9. Lotting Plan (Sheet 8)
10. Lotting Plan (Sheet 9)
11. Lotting Plan (Sheet 10)
12. Lotting Plan (Sheet 11)
13. Lotting Plan (Sheet 12)
14. Lotting Plan (Sheet 13)
15. Lotting Plan (Sheet 14)
16. Lotting Plan (Sheet 15)
17. Lotting Plan (Sheet 16)
18. Lotting Plan (Sheet 17)
19. Lotting Plan (Sheet 18)
20. Lotting Plan (Sheet 19)
21. Lotting Plan (Sheet 20)
22. Lotting Plan (Sheet 21)
23. Lotting Plan (Sheet 22)
24. Lotting Plan (Sheet 23)
25. Preliminary Grading Plan (Sheet 24)
26. Preliminary Grading Plan (Sheet 25)
27. Preliminary Grading Plan (Sheet 26)

28. Preliminary Grading Plan (Sheet 27)
29. Preliminary Grading Plan (Sheet 28)
30. Preliminary Grading Plan (Sheet 29)
31. Preliminary Grading Plan (Sheet 30)
32. Preliminary Grading Plan (Sheet 31)
33. Preliminary Grading Plan (Sheet 32)
34. Preliminary Grading Plan (Sheet 33)
35. Preliminary Grading Plan (Sheet 34)
36. Preliminary Grading Plan (Sheet 35)
37. Preliminary Grading Plan (Sheet 36)
38. Preliminary Grading Plan (Sheet 37)
39. Preliminary Grading Plan (Sheet 38)
40. Preliminary Grading Plan (Sheet 39)
41. Grading Sections (Sheet 40)
42. Grading Sections (Sheet 41)
43. Preliminary Utilities Plan (Sheet 42)
44. Preliminary Utilities Plan (Sheet 43)
45. Preliminary Utilities Plan (Sheet 44)
46. Preliminary Utilities Plan (Sheet 45)
47. Preliminary Utilities Plan (Sheet 46)
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53. Preliminary Utilities Plan (Sheet 52)
54. Preliminary Utilities Plan (Sheet 53)
55. Preliminary Utilities Plan (Sheet 54)
56. Preliminary Utilities Plan (Sheet 55)
57. Preliminary Utilities Plan (Sheet 56)
58. Stormwater Control Plan (Sheet 57)
59. Stormwater Control Notes & Details (Sheet 58)
60. Stormwater Basin West (Sheet 59)
61. Stormwater Basin East (Sheet 60)
62. Preliminary Traffic Calming (Sheet 61)
63. Cumulative Noise Levels (Sheet 62)
64. Phasing Plan (Sheet 63)
65. Affordable Housing Plan dated April 5, 2024
66. Engineer's Report dated November 22, 2023
67. Final Mitigation Monitoring and Reporting Program for Final Central Area Specific Plan dated November 2020
68. Petitioners' Opening Brief in Support of First Amended Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief [Monterey County Superior Court Case No. 20CV003402]
69. Stipulated Judgment Denying First Amended Petition for Writ of Mandate and

Complaint for Declaratory and Injunctive Relief

70. *Central Area Specific Plan, Analysis of School Enrollments, Capacity, and Capital Funding in Alisal Union School District* (Oct. 24, 2022)
71. Declaration of Olga Bevz in Support of Respondents' Opposition to First Amended Petition for Peremptory Writ of Mandate and Complaint for Declaratory and Injunctive Relief
72. Concerned Dublin Citizens v. City of Dublin, 214 Cal.App.4th 1301 (2013)
73. Introduction to Draft Environmental Impact Report – Salinas Central Area Specific Plan Pages 1.0-2 – 1.0-5
74. Exhibit "P-2" CASP General Plan Map for TM 2021-001
75. Exhibit "Q-2" CASP Zoning Code Map for TM 2021-001