COUNTY OF MONTEREY
HOUSING AND COMMUNITY DEVELOPMENT
1441 SCHILLING PLACE, 2nd FLOOR, SALINAS, CA 93901
PHONE: (831) 755-5025/FAX: (831) 757-9516

INITIAL STUDY

I. BACKGROUND INFORMATION

Project Title:	Bengard Family Partnership Et Al
File No.:	PLN230035
Project Location:	1981, 1983 and 1985 Alisal Road, Salinas
Name of Property Owner:	Bengard Family Partnership Et Al
Name of Applicant:	Bengard Family Partnership Et Al
Assessor's Parcel Number(s):	153-011-064-000
Acreage of Property:	188 acres
General Plan Designation:	Farmlands 40 Acre Minimum
Zoning District:	Farmlands 40 Acre Minimum
Lead Agency:	County of Monterey HCD-Planning
Prepared By:	County of Monterey HCD-Planning
Date Prepared:	October 20, 2023
Contact Person:	Fionna Jensen , Monterey County HCD-Planning Phone: 831-796-6407 Email: jensenf1@co.monterey.ca.us

II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING

A. Description of Project:

Project Description. The Proposed Project consists of the construction of three two-story 16,286 square foot agricultural employee housing apartment buildings (48,858 square feet total) containing 45 residential units to accommodate up to 360 farmworker employees and one (1) managers unit, and associated site improvements including one (1) laundry facility, one (1) recreation room, open space and informal sports fields (Source: 1). The Proposed Project also includes a fire access aisle, trash enclosures, on-site parking (with electrical vehicle charging stations), perimeter fencing, bicycle racks, and landscaping. The Proposed Project would be occupied primarily during the Salinas Valley harvest season from March through November. The housing would be available for agricultural employees, and the housing would be designed to accommodate up to 360 agricultural employees without dependents. Each apartment unit would be suitable to house eight (8) individuals and provide the essential needs such as kitchen and restroom amenities. See **Figure 1** (Site Plan). The Proposed Project would be located on a 5.24-acre portion ("Project site") (inclusive of 1.44-acre acres of agricultural buffer zones) of an approximately 188.09-acre parcel, owned by the Bengard Family Partnership, LP. The Project site would be located at 1981, 1983, and 1985 Alisal Road, Salinas, within unincorporated Monterey County.

The Proposed Project, as described above, was processed in accordance with Monterey County Zoning Code Title 21 (Title 21), Section 21.66.060, which requires the issuance of a Use Permit for agricultural employee housing consisting of more than thirty-seven (37) or more beds in group quarters or thirteen (13) or more units or spaces designed for use by a single family or household.

Traffic. Direct pedestrian and vehicular access to the Project site would be provided via two driveways abutting Sconberg Parkway and Alisal Road. The driveway from Alisal Road would connect to the driveway serving the existing agricultural employee housing and residential uses and would be the primary ingress and egress for the Proposed Project. A new driveway from Sconberg Road would also be constructed to serve as secondary ingress and egress. As shown in the site plan (Source: 1), a third access route from Sconberg Parkway is proposed for emergency vehicular ingress and egress. A majority of the seasonal employees would not have personal vehicles and therefore would be transported to and from work sites (agricultural fields throughout Monterey County) via busses and carpools. Outbound vanpool and/or bus transportation occurs by 5:00 A.M. and inbound bus and/or vanpool trips would occur between 12:00 PM and 4:00 PM. Buses would be stored offsite and driven to and from the Project site each day, while the vans would be parked onsite. During weekday evenings and weekends, bus service would be provided to employees to transport employees to shopping, recreation, and religious services.

Fencing and Lighting. The Proposed Project would include installation of a perimeter fence around the 5.24 Project site and three vehicle gates at the Sconberg Parkway and Alisal Road driveways (Source: 1). Exterior lighting would be downward facing and shielded to direct light downwards and prevent excess light pollution. All exterior lighting would be consistent with local lighting ordinances and the County's Design Guidelines for Exterior Lighting.

Recreation. The Proposed Project incorporates indoor and outdoor recreational facilities consisting of one (1) recreation room, various open spaces including walkways, and two sports/recreation fields (Source: 1).

Water. The Project site is located within Alco Water Service's (Alco's) Salinas Division's California Public Utilities Commission (CPUC) service area. Alco's Salinas Division serves public utility water to the northeastern portion of the City of Salinas. A "Can and Will Serve" letter has been issued by Alco Water (dated January 18, 2023; Source: 20) confirming that it can and will serve potable water to the Project site. The Proposed Project would connect to the existing water system.

Wastewater. The Project site is located in unincorporated Monterey County within the City of Salinas's Sphere of Influence. The Proposed Project would connect to an existing City of Salinas 15-inch sanitary sewer main in Sconberg Parkway, which would convey wastewater to be treated by Monterey One Water (M1W) at the regional treatment plant located in Marina, California. A "Can and Will Serve" letter has been issued by the City of Salinas (dated September 6, 2023; Source: 32) confirming that it has the capacity and ability to serve the Project site. The existing two agriculture employee housing apartments, agricultural support facilities, six single-family dwellings, and a laundry room are currently served by 12 existing septic systems (septic tank and dispersal fields). The Proposed Project also includes the demolition of the existing septic systems serving the laundry room and 16 agriculture employee housing units. These structures would then also be connected to the City of Salinas's sanitary sewer main.

Solid Waste. The Proposed Project's waste would be hauled by Waste Management, Inc. of Monterey County.

Drainage. A Preliminary Stormwater Control Plan, dated June 30, 2023, was prepared for the Proposed Project by Whitson engineers (Source: 16). The plan summarizes the Project's proposed stormwater management strategy pursuant to the Post Construction Stormwater Management Central Coast Region, Central Coast Regional Water Quality Control Board Resolution No. R3-2013-0032, and the guidance documents promulgated by the Monterey Regional Stormwater Management Program (MRSWMP), including the Stormwater Technical Guide for Low Impact Development. The drainage system would be designed and constructed to meet current regulations and requirements, including the Monterey County flood control requirements pursuant to Monterey County Code (MCC) Section 16.16.050.

Grading. The Proposed Project includes over an acre of land disturbance with 4,700 cubic yards of cut and 4,700 cubic yards of fill to be balanced onsite.

Construction. The duration of construction of the Proposed Project is expected to be approximately 12 months from issuance of construction permits. Proposed construction hours are 7:00 A.M. to 5:00 P.M. Monday through Saturday. The number of workers will vary throughout construction and will range from 10 to 100 workers at any given time.

Fire. The Proposed Project would be served by the Monterey County Regional Fire Protection District and the Monterey County Sheriff's Office. Pursuant to Monterey County Fire Code, all proposed buildings would include a fire sprinkler and fire alarm system, as well as onsite fire hydrants.

B. Environmental Setting and Surrounding Uses

The Proposed Project would be located near the City of Salinas at the intersection of Alisal Road and Sconberg Parkways, within unincorporated Monterey County on a 5.24-acre portion ("Project site") (inclusive of 1.44-acre acres of agricultural buffer zones) of an approximately 188.09-acre parcel, owned by the Bengard Family Partnership, LP. The subject property (Assessor's Parcel Number [APN]: 153-011-064-000) is zoned and has a land use designation of Farmland, 40 acres per unit. See **Figure 2**. The subject property is currently being used for agricultural row-crop production, agricultural employee housing, and agricultural support space (e.g., shops, yards, office, etc.). The existing employee housing consists of 16 apartment units (two apartment buildings), six (6) single-family homes, and one (1) common laundry room. The existing agriculture employee housing was authorized thorugh the issuance of a Use Permit in 1987 (Monterey County Planning Commission Resolution No. 87-172; Source: 37). Photographs of the site are provided in **Figures 3** and **4**.

The Proposed Project site is within the boundaries of the Greater Salinas Area Plan and is zoned and designated under the 2010 General Plan as Farmlands - 40 Acre Minimum (F/40). The Project site is surrounded by parcels within the City of Salinas and County of Monterey jurisdiction.

Zoning designations for parcels surrounding the project site are listed below:

- North: F/40 (parcels within County of Monterey) and Public/Semi-public (PS), Residential Medium Density (RM-3.6), and Residential Low Density (RL-5.5) (parcels within City of Salinas).
- South: F/40 (parcels within Coutny of Monterey).
- West: PS (parcels within City of Salinas).
- East: F/40 (parcels within Coutny of Monterey).

C. Other public agencies whose approval is required:

The Initial Study is an informational document for both agency decision-makers and the public. The County is the lead agency responsible for adoption of the IS/MND and approving land use permits related to the Proposed Project. Below is a list of approvals required by Monterey County. Project entitlements would include, but not be limited to:

- Use Permit to allow construction of three two-story 16,286 square foot agricultural employee housing apartment buildings (48,858 square feet total) containing 45 residential units to accommodate up to 360 employees, and associated site improvements including a laundry facility, a recreation room, open space, and informal sports fields.
- Building and Grading Permits

Encroachment Permits would be required from the City of Salinas to allow construction of the proposed driveways.

Figure 1. Site Plan

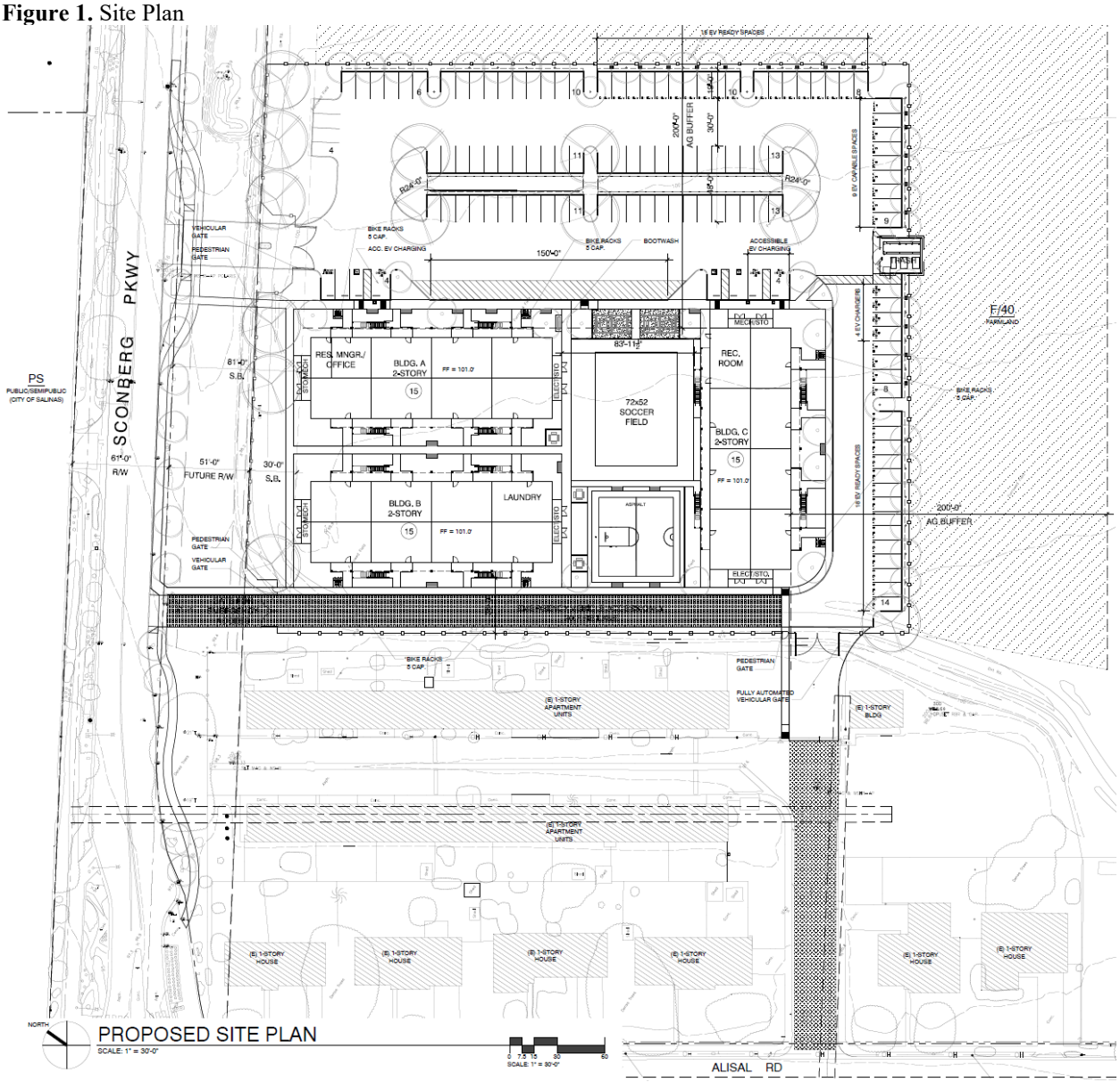

Figure 2. Land Use Designation

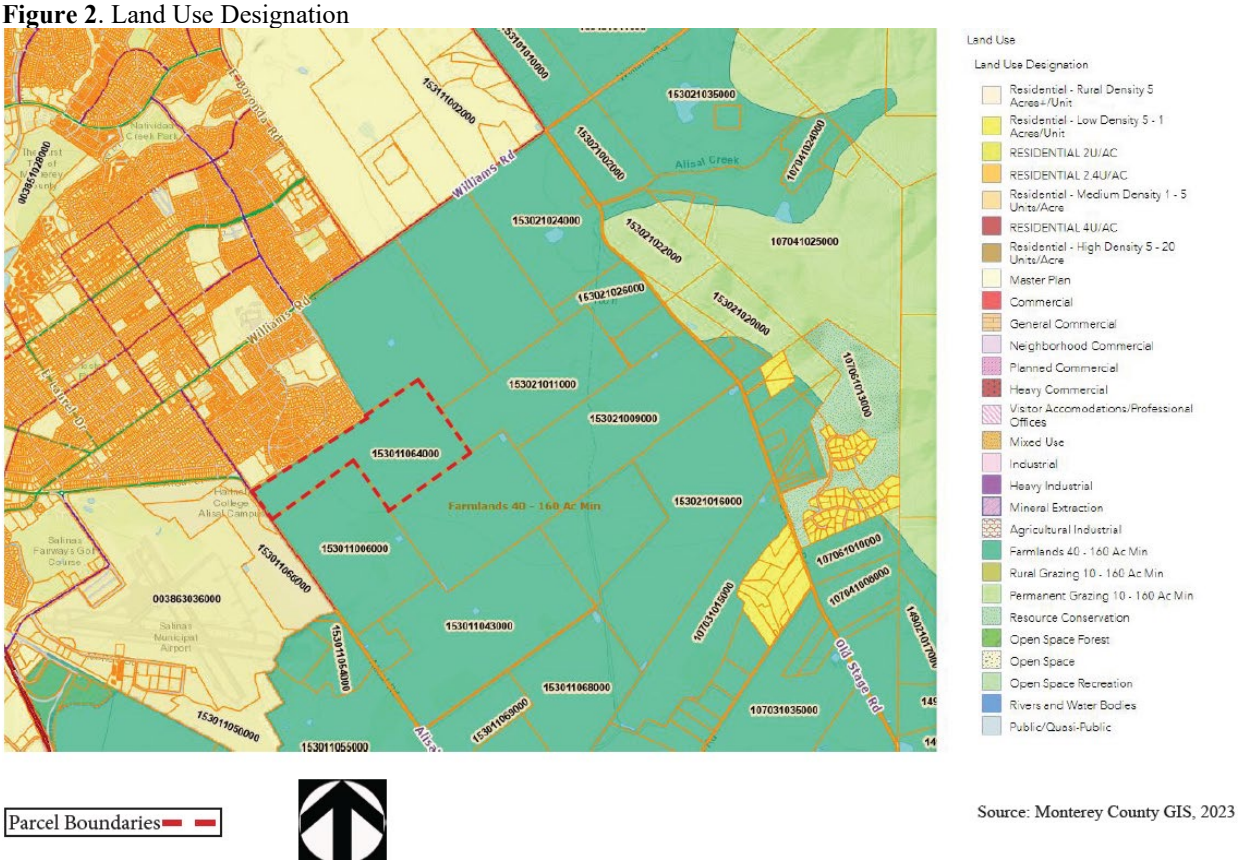

Figure 3. Aerial Image

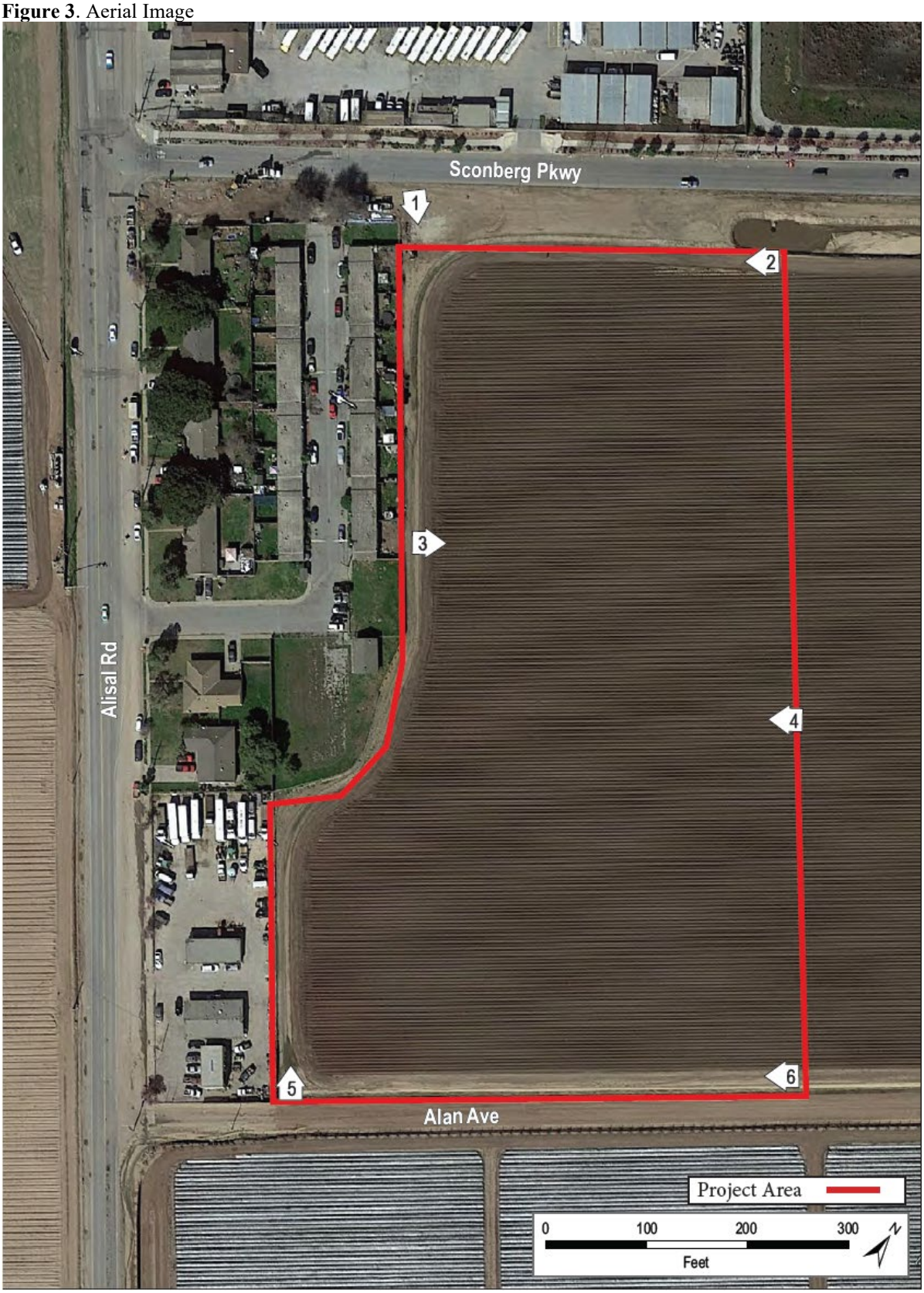

Figure 4. Site Photographs

Viewpoint 1: View southeast along the southwest edge of the project

Viewpoint 2: View southwest along Sconberg Parkway from the northeast corner of the project

Viewpoint 3: View northeast across the project within agricultural field

Viewpoint 4: View southwest across the project within agricultural field

Viewpoint 5: View northwest from the southwest corner of the project

Viewpoint 6: View southwest along the project adjacent to Alan Avenue

III. PROJECT CONSISTENCY WITH OTHER APPLICABLE LOCAL AND STATE PLANS AND MANDATED LAWS

General Plan	☒	Air Quality Mgmt. Plan	☒
Specific Plan	☐	Airport Land Use Plans	☒
Water Quality Control Plan	☒	Local Coastal Program-LUP	☐

Monterey County 2010 General Plan/ Greater Salinas Area Plan

The project was reviewed for consistency with the policies from the Monterey County 2010 General Plan and the Greater Salinas Area Plan. The intent of the General Plan is to maintain and enhance the County's rural character, natural resources, and economic base by providing for adequate residential, agricultural, commercial and industrial growth in areas best suited for the respective development.

The project is consistent with the Agricultural element of the Monterey County General Plan. General Plan Policy AG-1.1 prevents land uses that would interfere with routine and ongoing agricultural operations on viable farmlands designated as Prime, of Statewide Importance, Unique, or of Local Importance. The subject parcel is currently used for agricultural employee housing and ongoing agricultural operations on viable farmlands. General Plan Policy AG-1.4 considers ancillary and support uses and facilities as forms of viable agricultural land uses on farmland designated as Prime, of Statewide Importance, Unqiue or of Local Importance, and encourages enhancement, expansion, and conservation of this use. The Proposed Project's farmworker housing is considered a support use under General Plan Policy AG-2.1. General Plan Policy AG-1.6 states that farmworker housing projects may be considered subject to appropriate public health and environmental review in accordance with state law. Additionally, this policy states that farmworker housing projects shall be located to minimize the conversion of viable agricultural lands and shall be consistent with the nature of the surrounding land uses. Additionally, AG-1.7 states that housing facilities for farmworkers employed on-site or off-site are allowed in agricultural land use designations and clustering of residential uses is encouraged in order to minimize impacts on the most productive lands. As sited, the Proposed Project clusters development on the 188-acre parcel to areas that are adjacent to existing agricultural housing and residential uses. In accordance with General Plan Policies AG-1.2 and AG-1.8, the project is subject to review by the Agricultural Advisory Committee (AAC). Consistent with MCC Section 21.66.030, the proposed agriculture buffer is 200 feet.

The Proposed Project is consistent with the 2015-2023 Housing Element of the 2010 Monterey County General Plan. General Plan Policy H-2.1 encourages the planning of farmworker housing, and General Plan Policy H-2.11 supports private sector partnerships to increase the supply of farmworker housing within Monterey County. General Plan Policy H-2.b sets an objective for the County to assist employers in providing 10 lower income farmworker housing units annually with three of the 10 units as extremely low income annually. The Proposed Project would provide 45 units of farmworker housing, of which potentially three units or more would be charged at no additional cost (except for furnishing) to domestic or H2A temporary farmworkers.

The Proposed Project is consistent with the Land Use, Safety, and Public Services Elements of the 2010 Monterey County General Plan. Approval of the Project will be conditioned to provide an exterior lighting plan consistent with General Plan Policy LU-1.13. Consistent with General Plan Policy S-3.1 and S-3.3, the Proposed Project's on-site drainage improvements and facilities shall result in conditions that reduce the development's peak flow rates when compared to the pre-development peak flow drainage. A Geotechnical Report was provided with the Proposed Project application that verified that the project site is suitable for the proposed project, consistent with S-1.7 (Source: 13). According to the Acoustical study produced by 45 dB Acoustics LLC, the project's ongoing operations should not exceed 65 dBa, which is deemed an acceptable amount. The Proposed Project is consistent with the long-term sustainable water supply findings contained in Policies PS-3.1 and PS-3.2 of the Public Services Element of the 2010 Monterey County General Plan.

Air Quality Management Plan

The Proposed Project was reviewed for consistency with the 2008 Monterey Bay Area Resources District's (MBARD) CEQA Air Quality Guidelines for the Monterey Bay Region. Section IV.3 below (Air quality) discusses standards applicable to whether this particular project conflicts or obstructs implementation of air quality plans, violates any standard or contributes to air quality violations, results in cumulative non-attainment of ambient air quality standards, exposes sensitive receptors to pollutant concentrations or creates objectionable odors affecting many people. The Proposed Project complies with the requirements of this plan.

Water Quality Control Plan

The Proposed Project is consistent with the 2010 General Plan and AMBAG'S 2018 Regional Growth Forecast. The Regional Water Quality Control Board (RWQCB) incorporates these documents in its preparation of regional water quality plans. Therefore, the Proposed Project is consistent with the Regional Water Quality Control Plan. Section IV.9 (Hydrology and Water Quality) below, discusses whether this project violates any water quality standards or waste discharge requirements, substantially depletes groundwater supplies or interferes substantially with groundwater supplies or interferes substantially with groundwater recharge substantially alters the existing drainage pattern of the site or area, or creates or contributes runoff water that would exceed the capacity of existing or planned storm water drainage.

Airport Land Use Plan

The Monterey County Airport Land Use Commission found the Proposed Project consistent with the 1982 Airport Land Use Plan (ALUP) for Salinas Municipal Airport on October 23, 2023 (Sources: 35 and 36). As detailed in Section IV.9 (Hazards and Hazardous Materials) and Section IV.13 (Noise), although the subject property is not located within an area subject to higher noise levels (imagery surface of noise exposure; Diagram E and D of the ALUP, Source: 35), it is partially located within the Local Flight Pattern of Runway 8-26 and 13-31 and thus would be subject to similar considerations as those given to imaginary surfaces and may be exposed to additional "noise, vibration and psychological trepidation." However, the ALUP dictates residential uses in this flight pattern are compatible uses within this area and not considered environmentally sensitive land uses.

The ALUP does not establish different safety zones within the Airport Influence Area for the Salinas Municipal Airport, and therefore the safety zone map prepared by Caltrans in 2012 was used for this analysis. The prepared safety zone map is based on Caltrans Airport Land Use Handbook (ALUH) and establishes the approximate safety zone boundaries for the Salinas Municipal Airport. Accordingly, the subject property is located within Safety Zone 6 (Traffic Pattern Zone) and outside of the ALUP's Building Restriction Zone (Diagram A of the ALUP). Safety Zone 6 prohibits hazards to flight and very high-intensity uses such as sports stadiums but allows for residential uses at all densities. Additionally, the proposed residential development would have a ridge height of approximately 29 feet 6 inches. At the proposed height, the development would not encroach into the imaginary surfaces (Part 77, Diagram B of the ALUP) (Source: 35).

IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

A. Factors

The environmental factos checked below would be potentially affected by this project, as discussed within the checklist on the following pages.

☒ Aesthetics	☒ Agriculture and Forest 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/Traffic	☒ Tribal Cultural Resources
☒ Utilities/Service Systems	☐ Wildfires	☒ Mandatory Findings of Significance

Some proposed applications that are not exempt from CEQA review may have little or no potential for adverse environmental impact related to most of the topics in the Environmental Checklist; and/or potential impacts may involve only a few limited subject areas. These types of projects are generally minor in scope, located in a non-sensitive environment, and are easily identifiable and without public controversy. For the environmental issue areas where there is no potential for significant environmental impact (and not checked above), the following finding can be made using the project description, environmental setting, or other information as supporting evidence.

☐ Check here if this finding is not applicable

FINDING: For the above referenced topics that are not checked off, there is no potential for significant environmental impact to occur from either construction, operation or maintenance of the proposed project and no further discussion in the Environmental Checklist is necessary.

EVIDENCE:

Section IV.12 – Mineral Resources: In accordance with the Surface Mining and Reclamation Act of 1975 (SMARA), the California Geological Survey (CGS) maps the regional significance of mineral resources throughout the state, with priority given to areas where future mineral resource extraction could be precluded by incompatible land use or to mineral resources likely to be mined during the 50-year period following their classification. The Project site does not contain mineral resources subject to SMARA, therefore, the Proposed Project would not result in any impact from the loss of availability of a known mineral resource.

Section: IV.20 – Wildfires: The Project site is surrounded by agricultural and residential land uses, is not located in a State Responsibility Area, and is not designated as a Very High Fire Hazard Severity Zone (VHFHZ) for wildland fires. The Proposed Project would not incur a risk of fire beyond what is typical of a project of a similar nature and similarly, the associated upgrades would not exacerbate any of the risk associated with wildfires. The Proposed Project is served by the Monterey County Regional Fire Protections District (FPD) and would be required to meet all current fire codes as part of the construction permit process. No conditions have been imposed on the Proposed Project by the FPD. The Proposed Project would not create any barriers that would impair emergency or other vehicle movement. Although Alisal Road is identified as an Evacuation Route per the 2010 General Plan – Safety Element, a majority of the residents of the Proposed Project would not own their own vehicles. Therefore, the Proposed Project would not substantially impact the regional emergency evacuation plan, regardless of the proximity to a designated evacuation route. For these reasons, the Proposed Project would not have any impact relative to the execution of an established emergency evacuation plan. The Proposed Project would not exacerbate wildfire risks due to slope, prevailing winds, or other factors due to the relatively level area that the project lies on, the lack of surrounding susceptible areas, and the lack of fire hazard area. Therefore, there would be no impact. Due to the lack of naturally susceptible wildfire areas within close proximity to the proposed project, the requirement of installation or maintenance of infrastructure would not be required. Thus, the Proposed Project would not expose people or structures to significant risks. Therefore, there would be no impact.

B. DETERMINATION

Based on this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment 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 MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Fionna Jensen

Signature

November 13, 2023

Date

Fionna Jensen, Senior Planner,
Monterey County Housing and Community Development

V. EVALUATION OF ENVIRONMENTAL IMPACTS

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 parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained 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 project-specific screening analysis).

2) All answers must consider the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and 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.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a

previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

8) The explanation 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 significance.

VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☐	☒
c) 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 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. (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
The subject 188-acre property (APN: 153-011-064-000) is zoned Farmland, 40 acres per unit, and is currently being used for agricultural row-crop production, agricultural employee housing, and agricultural support space (e.g., shops, yards, office, etc.). The existing employee housing consists of 16 apartment units (two apartment buildings), six (6) single-family homes, and one (1) common laundry room.

Aesthetic (a) and (b) - No Impact:
According to the Monterey County 2010 General Plan, the Proposed Project site is not located within a visually sensitive area and is not visible from any designated scenic highway corridors. Further, the Project site is within the Greater Salinas Area Plan, which does not identify any scenic corridor or highway. The nearest scenic highway is Highway 68, located over 3.5 miles southwest of the Project site. The subject parcel has a limited number of trees, which are planted in the existing agricultural residential area of the parcel. The Proposed Project does not involve the removal of any trees. No rock outcroppings exist on the subject parcel or within the Project site, which is currently utilized for agricultural crop production. Therefore, there are no scenic resources on the site, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway that would be damaged as a result from the Proposed Project. Thus, because the subject property does contain any scenic resources and Project site is not located in a visually sensitive area or within view of a scenic corridor or vista, the Proposed Project would have no impact on scenic vistas or scenic resources.

Aesthetics (c) - Less than Significant Impact:
Approximately 0.4% of the subject property is currently developed with structures. The remainder of the property is used for agricultural row-crop production. The Proposed Project would be constructed on a 3.8-acre portion of the subject property, resulting in a total site coverage of approximately 0.8 percent. The Project site is located near the corner of Schonberg Parkway and Alisal Road, adjacent to City of Salinas jurisdictional boundaries. The Project site is surrounded by agricultural lands to the south, north, west, and east, Hartnell College, and the Salinas Municipal Airport to the west, and educational uses (Bardin Elementary School, offices, and storage yard) and medium- and low-density residential neighborhood to the north. The residential neighborhood is directly adjacent to the subject property within the City of Salinas jurisdiction and just north of the Project site. The Proposed Project would alter the existing visual character of the site by introducing new residential structures to the area. As proposed, the three apartment buildings would be constructed to a height of 29.5 feet. The proposed height would be consistent with the 30-foot height limit applied to the neighborhood located north of the Project site, which contains one- and two-story single-family dwellings. The proposed colors would include various shades of brown and gray. These natural colors would be compatible with the surrounding agricultural uses. From Ailsa Road, the Proposed Project's two-story building would be visible, but visibility would be limited as the exiting one-story structures and mature trees would interfere. From Schonberg Parkway and neighboring residences, the proposed siting, landscaping, and natural colors would reduce the visual impacts of the Proposed Project to less than significant.

Aesthetics (d) - Less than Significant Impact:

The Proposed Project would utilize nighttime lighting for security purposes. However, no nighttime lighting would be used during construction of the Proposed Project. All proposed exterior lighting would be consistent with the Monterey County 2010 General Plan lighting policies, including Policy LU-1.13, which states that "All exterior lighting shall be unobtrusive and constructed or located so that only the intended area is illuminated, long range visibility is reduced of the lighting source, and off-site glare is fully controlled." Submittal, review and approval of an exterior lighting plan would be included as a condition of approval to ensure that all lighting be downlit, shielded, and unobtrusive to the surrounding areas. Therefore, the Proposed Project would have a less-than-significant impact related to lighting or glare.

2. AGRICULTURAL AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (Source: 1, 2, 3, 4, 5, 6, 7)	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? (Source: 1, 2, 3, 4, 5 ,6 ,7)	☐	☐	☒	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (Source: 1, 2, 3, 4, 5, 6, 7)	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use? (Source: 1, 2, 3, 4, 5, 6, 7)	☐	☐	☐	☒
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? (Source: 1, 2, 3, 4, 5, 6, 7)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

The subject property is zoned Farmland, 40 acres per unit. The Department of Conservation's California Important Farmland Finder designated the entire property as Prime and Important Farmlands, except for the portion of the property currently developed with agricultural support structures and farmworker housing that is designated as Urban/Built-Up Land. The subject property is not subject to a Williamson Act or Agricultural Land Preserve Contract. The site is not designated as forest land, or in an area for timberland production. The Proposed Project is allowed under 2010 General Plan Policies AG-1.6 and AG-1.7. Further, Policy AG-2.1 states that permanent worker housing shall be considered compatible and appropriate uses in the Farmlands land use designation.

Agricultural and Forest Resources (a), (b) and (e) - Less than Significant Impact:
The Proposed Project would convert prime farmland into an agricultural. The Proposed Project would supply agricultural workforce housing to the greater Monterey County area. The agricultural workforce housing use is considered an agricultural support use under Policy AG-2.1, and an allowed use under AG-1.6 and AG-1.7 of the Agricultural Element of the 2010 Monterey County General Plan. Therefore, the Proposed Project would not convert Farmland of Prime, Unique, or of Statewide Importance to a non-agricultural use. Additionally, the Proposed Project site is not part of a Williamson Act Contract. The Proposed Project does not contain any other changes that would convert farmland to non-agricultural use or conversion of forest land to non-forest use and would result in a less than significant impact.

Agricultural and Forest Resources (c) and (d) - No Impact:
The subject property is not designated as forest land or in an area for timberland production, therefore the Proposed Project would not conflict with zoning for forestland or timberland areas or timberland production; nor would it result in the loss of forest land or conversion of forest land to non-forest use, resulting in no impact.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan? (Source: 1, 2, 3, 4, 5, 6, 8, 9, 10)	☐	☐	☐	☒
b) Result in a 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? (Source: 1, 2, 3, 4, 5, 6, 8, 9, 10)	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations? (Source: 1, 2, 3, 4, 5, 6, 8, 9, 10)	☐	☐	☒	☐

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Source: 1, 2, 3, 4, 5, 6, 8, 9, 10)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
Proposed Project construction would involve equipment typically used in residential construction projects, such as excavators and trucks, that would emit air pollutants such as carbon monoxide (CO), particulate matter less than 10 microns in diameter (PM_{10}) and 2.5 microns in diameter ($PM_{2.5}$), and nitrogen oxides (NO_X). The Proposed Project would involve approximately 4,700 cubic yards of cut to be balanced on site. No soils are anticipated to be exported offsite. An Air Quality Memorandum was prepared by Denise Duffy & Associates Inc on July 31, 2023 (Monterey County Library No. LIB230233; Source: 10).

The Project site is located within the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD). MBARD is responsible for producing an Air Quality Management Plan (AQMP) that reports air quality and regulates stationary sources throughout the NCCAB. MBARD is also responsible for measuring the concentration of pollutants and comparing those concentrations against Ambient Air Quality Standards ("AAQS"). Additionally, MBARD monitors criteria pollutants to determine whether they are in attainment or not in attainment. **Table 3-1** illustrates the attainment status for criteria pollutants.

Table 3-1 Attainment Status for the NCCAB

Pollutants	State Designation	Federal Designation
Ozone (O_3)	Nonattainment – Transitional	Attainment
Inhalable Particulates (PM_{10})	Nonattainment	Attainment
Fine Particulates ($PM_{2.5}$)	Attainment	Attainment
Carbon Monoxide (CO)	Monterey Co. – Attainment	Attainment
	San Benito Co. – Unclassified	Attainment
	Santa Cruz Co. – Unclassified	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Attainment

Source: 9, Monterey Bay Air Resources District, 2017. 2012 – 2015 Air Quality Management Plan

MBARD has set air quality thresholds of significance for the evaluation of projects. **Table 3-2** illustrates the thresholds of significance used to determine if a project would have a significant air quality effect on the environment during construction.

Table 3-2 Thresholds of Significance Construction Emissions

Pollutant	Threshold of Significance (lbs./day)
Nitrogen Oxides (NO_x)	137
Reactive Organic Gases (ROG)	137
Respirable Particular Matter (PM_{10})	82
Fine Particulate Matter ($PM_{2.5}$)	55
Carbon Monoxide (CO)	550

Source: Monterey Bay Unified Air Pollution Control District, 2016. Guidelines for Implementing the California Environmental Quality Act.

In addition to these thresholds, MBARD has also determined that a significant short-term construction-generated impact would occur if more than 2.2 acres of major earthmoving (i.e., excavation) per day were to occur. Activities associated with this threshold include excavation and grading. For projects that require minimal earthmoving activities, MBARD has determined that a significant short-term construction-generated impact would occur if more than 8.1 acres per day of earthmoving were to occur (Source 8: MBARD, 2008).

Table 3-3 illustrates the thresholds of significance used to determine if a project would have a significant air quality effect on the environment during operation.

Table 3-3 Thresholds of Significance Operational Emissions

Pollutant	Threshold of Significance (lbs./day)
Nitrogen Oxides (NO_x)	137
Reactive Organic Gases (ROG)	137
Respirable Particular Matter (PM_{10})	82
Fine Particulate Matter ($PM_{2.5}$)	55
Carbon Monoxide (CO)	550

Source 8: Monterey Bay Unified Air Pollution Control District, 2008. Guidelines for Implementing the California Environmental Quality Act.

The California Air Resources Board ("CARB") defines a sensitive receptor as children, elderly, asthmatic, and others who are at high risk of negative health outcomes due to exposure to air pollution. Pursuant to California Health and Safety Code Sec. 42705.5, a sensitive receptor includes hospitals, schools, day care centers, and such locations as the district or state board may determine. MBARD similarly defines sensitive receptors and adds that the location of sensitive receptors be explained in terms that draw a relationship to the project site and potential air quality impacts. The nearest sensitive receptors (i.e., residence, health care center, visitor-serving accommodations) are located approximately 80 feet south from the Proposed Project site.

Air Quality (a) - No Impact:

CEQA Guidelines Sec. 15125(b) requires that a project be evaluated for consistency with applicable regional plans, including the AQMP. MBARD is required to update their AQMP every three (3) years. The most recent update was the 2012 – 2015 AQMP which was adopted in March 2017. This plan addresses the attainment of the State ozone standard and Federal air quality standards. The AQMP accommodates growth by projecting growth in emissions based on population forecasts prepared by the Association of Monterey Bay Area Governments ("AMBAG") and other indicators. Consistency determinations are issued for commercial, industrial, residential, and infrastructure-related projects that have the potential to induce population growth. A project is considered inconsistent with the AQMP if it has not been

accommodated in the forecast projects considered in the AQMP. The Proposed Project consists of the construction of an approximate 48,858 square feet of living space designed to accommodate a maximum of 360 seasonal agricultural employees. The Proposed Project would be located adjacent to an elementary school, Bardin Elementary School, and residential subdivision in City of Salinas, as well as existing on-site agriculture employee housing. The Proposed Project would not result in a substantial long-term increase in employment as a majority of the anticipated occupants are already employed throughout the County, and the population increase has been accounted for in AMBAG's 2022 Regional Growth Forecast. Therefore, the Proposed Project would not conflict with or obstruct an applicable air quality plan.

Air Quality (b) and (c) - Less than Significant Impact:

The MBARD 2016 CEQA Air Quality Guidelines contain standards of significance for evaluating potential air quality effects of projects subject to the requirements of CEQA. According to MBARD, a project would violate an air quality standard and/or contribute to an existing or projected violation if it would emit (from all sources, including exhaust and fugitive dust) more than:

- 137 pounds per day of oxides of nitrogen (NO_x),
- 137 pounds per day of reactive organic gases (ROG),
- 82 pounds per day of respirable particulate matter (PM_{10}),
- 55 pounds per day of fine particulate matter ($PM_{2.5}$), and
- 550 pounds per day carbon monoxide (CO).

According to the MBARD's criteria for determining construction impacts, a project would result in a potentially significant impact if it would result in 8.1 acres of minimal earthmoving per day or 2.2 acres per day with major grading and excavation.

Construction of the Proposed Project would require 4,700 cubic yards of cut to be balanced on site. Construction would require equipment such as tractors, backhoes, excavators, loading trucks, and pickup trucks. Construction-related emissions would come from sources such as exhaust or fugitive dust. Construction of the Proposed Project would not, however, exceed MBARD's significance criteria. The Proposed Project would result in minimal ground-disturbing activities. Grading and excavation-related activities would occur over several days and would not exceed MBARD's daily ground disturbing thresholds for excavation (2.2 acres per day) or grading (8.1 acres per day). Therefore, the Proposed Project would have a less than significant construction-related air quality impact.

The Proposed Project would implement standard construction Best Management Practices ("BMPs") related to dust suppression (e.g., watering active construction areas, prohibiting grading activities during periods of high wind (over 15 mph), covering trucks hauling soil, covering exposed stockpiles, etc.) thereby further ensuring temporary construction-related effects would be minimized. Additionally, grading on the site would be subject to the regulations contained in Monterey County Code Chapters 16.08 - Grading and 16.12 – Erosion Control. Implementation of these requirements would ensure dust from grading activities is controlled and will not impact the adjacent existing agricultural employee housing, residential subdivision, or

Bardin Elementary School. For these reasons, construction of the Proposed Project would have a less than significant impact on air quality.

From an operational emission standpoint, the Proposed Project would result in operational emissions due to energy use and traffic. However, a significant impact resulting from operational emissions from Proposed Project activities is unlikely for several reasons. The primary source of operational emissions would be associated with motor vehicle use. The Proposed Project would primarily rely on the use of shuttle buses and vans to transport workers, which would result in overall reductions in regional vehicle miles traveled (VMT) associated emissions. Emissions associated with area sources, such as landscape maintenance activities, as well as the use of electricity and natural gas would also contribute to increased operational emissions. These operational emissions would not be substantial or impact nearby sensitive receptors as they are associated with typical residential uses. Further, the Proposed Project would be constructed in accordance with contemporary building standards. The installation of energy-efficient building upgrades would reduce operational energy demand. As a result, daily operational emissions of criteria pollutants would not exceed any MBARD emissions thresholds and would not have a significant impact on regional air quality or attainment and maintenance of ozone AAQS.

Air Quality (d) and (e) - Less than Significant Impact:

CARB identifies sensitive receptors as children, elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. Locations where sensitive receptors congregate may include hospitals, schools, and day care centers. As discussed above, the construction of the Proposed Project would generate temporary air quality impacts. However, these impacts would be temporary in nature and would not exceed the thresholds set by MBARD and therefore would not result in a significant impact.

Existing odors onsite are generated from on-site agricultural row-crop production. However, these odors are typical of the surrounding agricultural areas to the north, east, and south. Implementation of the Proposed Project would not result in the installation of any major sources of odors, and as a result, would not result in the long-term exposure of individuals to increased concentrations of odors. Construction of the Proposed Project could generate temporary odors from construction equipment (e.g., diesel exhaust) which could be noticeable at times to neighboring residences or the Bardin Elementary School. In addition, pavement coatings used during project construction would also emit temporary odors. However, construction-generated odors would be temporary in nature and would not create objectionable odors that would affect a substantial number of persons. Further, construction emissions would occur intermittently and would dissipate rapidly within increasing distance from the source. As a result, short-term construction activities would not expose a substantial number of people to frequent odorous emissions. No new operational odors would be generated as a result of the Proposed Project resulting in a less than significant impact.

4. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Game or U.S. Fish and Wildlife Service? (Source: 1, 2, 3, 6, 11)	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (Source: 1, 2, 3, 6, 11)	☐	☐	☒	☐
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? (Source: 1, 2, 3, 6, 11)	☐	☐	☒	☐
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? (Source: 1, 2, 3, 6, 11)	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Source: 1, 2, 3, 6, 11)	☐	☐	☐	☒
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? (Source: 1, 2, 3, 6, 11)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

A Biological Assessment was prepared by Denise Duffy & Associates Inc (DD&A) to determine impacts on biological resources (Monterey County Library No. LIB230205; Source: 11). As described in the Biological Assessment, DD&A Assistant Environmental Scientist Rikki Lougee conducted a survey of the Project site on March 6, 2023, to characterize habitats present and to identify any special-status plant or wildlife species or suitable habitat for these species within the project site. Botanical survey methods included walking the survey area and using aerial maps to identify general and sensitive vegetation types as well as potential habitat for special-status plant species. Reconnaissance-level wildlife habitat surveys were also conducted on March 6, 2023 to identify suitable habitat for special-status species within the survey area. In addition, prior to the

field survey, DD&A conducted a desktop literature review to determine the presence or potential presence of special-status species and other sensitive biological resources within the project site.

Natural Communities and Sensitive Habitats
The Project site is currently utilized for row-crop production. One natural community—ruderal/disturbed—occurs along the margins of the Project site. Ruderal areas are those areas that have been disturbed by human activities and are dominated by non-native annual grasses and other "weedy" species. The Project Biologist noted that the entirety of the survey area is highly disturbed by agricultural use and supports only minimal vegetation consisting of scattered weeds. Where vegetation occurs, dominant species include non-native plants such as red stemmed filaree (*Erodium cicutarium*), Shepherd's purse (*Capsella bursa-pastoris*), and Bermuda grass (*Cynodon dactylon*). Ruderal and agricultural communities are not defined as sensitive community by California Department of Fish and Wildlife (CDFW). Additionally, no potential wetlands or waters of the U.S. or state or other sensitive habitats were identified within the survey area.

Special-Status Species
Special-status species are those plants and animals that have been formally listed or are Candidates for listing as Endangered or Threatened under the Endangered Species Act (ESA) or California Endangered Species Act (CESA), are CDFW "species of special concern," are listed as rare under the California Native Plant Protection Act (CNPPA), are included in the California Native Plant Society (CNPS) California Rare Plant Ranks (CRPR) 1A, 1B, 2A, or 2B, or are California Fully Protected Species. In addition, raptors (e.g., eagles, hawks, and owls), migratory birds, and their nests are protected under California Fish and Game Code. As described further below, no special-status plant or wildlife species was observed during the March 6, 2023 survey.

Biological Resources (a), (b) and (c) - Less than Significant with Mitigation Incorporated:
No special-status plant or wildlife species (including avian species) was observed during the March 6, 2023 survey. Further, no special-status plant or wildlife species is known to occur within the Project site. However, the Congdon's tarplant (*Centromadia parryi ssp. Congdonii*; CNPS CRPR 1B species) has the potential to occur within the Project site (primarily on dirt roads) based on the presence of suitable habitat and known occurrences in the vicinity. Congdon's tarplant is an annual herb associated with valley and foothill grassland on alkaline soils at elevations of 0-230 meters above sea level. Local populations of this species are also associated with disturbed areas and ruderal habitats. The blooming period is from May to November. The CNDDB reports 28 occurrences of Congdon's tarplant within the quadrangles evaluated, the nearest of which is located approximately 1.5 miles southwest of the survey area. There are four CNDDB occurrences of this species located within 2 miles of the survey area, found in similar habitat conditions (i.e., dirt roads, highly disturbed areas).

In addition, raptors and other nesting birds have the potential to nest within any of the large trees present adjacent to the Project site. Raptors, their nests, and other nesting birds are protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code, Section 3504. While the life histories of these species vary, overlapping nesting (approximately February through August) and foraging similarities allow for their concurrent discussion.

As discussed above, the Project site consists only of ruderal/disturbed habitat types. No wetlands or riparian vegetation are present, and the project is not located within the Coastal Zone or within designated critical habitat for listed species. Thus, the Proposed Project would not effect any riparian habitat or other sensitive natural community and there would be no removal, filling, or hydrological interruption of any wetland areas.

Construction activities associated with the Proposed Project would not result in direct or indirect impacts on sensitive habitats or special status wildlife species. However, project construction would potentially impact Congdon's tarplant – a special status plant species – and nesting raptors and other avian species. Implementation of **Mitigation Measure No. 1** would reduce impacts to special status plant species to a level of less than significant. Additionally, application and adherence to the County's standard Raptor/Migratory Bird Nesting Condition of Approval would lessen impacts to avian species to a level of less than significant.

Mitigation Measure No. 1: Pre-Construction Survey
Congdon's tarplant has the potential to occur within the survey area. Construction activities may result in loss of habitat and direct mortality of individuals, if present within the survey area. Prior to issuance of construction or grading permits from HCD-Building Services, a focused botanical survey shall be conducted by a qualified biologist (Project Biologist) within the survey area to determine the presence or absence of Congdon's tarplant, or any other special status plant species, within the Project site. If Congdon's tarplant, or any other special status plant species, is identified within the survey area, individuals that are not in the construction footprint shall be fenced or flagged for avoidance. The Project Biologist shall monitor the installation of protective fencing and shall monitor the site at least once per week until construction is complete to ensure that protective fencing remains intact. Weekly monitoring logs and a summary report on compliance/avoidance actions shall be provided to HCD-Planning upon completion of construction activities. If avoidance of all identified special status plant individuals is not possible, a Revegetation Plan shall be prepared by a qualified biologist prior to construction. The Revegetation Plan shall include a detailed description of revegetation areas, plant source material, planting specifications, and a monitoring program that describes annual monitoring efforts that incorporate success criteria and contingency plans if success criteria are not met. If required, the Revegetation Plan shall be prepared and approved prior to the issuance of construction or grading permits and implemented prior to final inspection.

Compliance Actions for Mitigation Measure No. 1

1a: Prior to the issuance of grading or construction permits from HCD-Building Services, the Applicant/Owner shall enter into a contract with a qualified biologist. The Contract shall be subject to HCD-Planning review and approval and shall include the requirements listed in this Mitigation Measure.

1b: Prior to the issuance of grading or construction permits from HCD-Building Services, the results of the pre-construction survey shall be submitted to HCD-Planning for review and approval. If special status plant species is not identified within the survey area, no additional actions are required. Should the survey identify special status plant species, the Project Biologist shall adhere to the Revegetation Plan requirements of this Mitigation Measure.

Biological Resources (d), (e), and (f) - No impact:
The project site is disturbed and utilized for agricultural operations and would not interfere 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. The Proposed Project would have no impact on wildlife movement, as the Project site is surrounded by agricultural areas and residential neighborhoods, and no wildlife corridors or nursery sites are present. The Proposed Project does not propose removal of any tree and would not conflict with local policies or ordinances pertaining to tree preservation policies and similar biological resource protections. Additionally, the Proposed Project is not located within, nor conflicts with, an adopted conservation plan. Therefore, the Proposed Project would result in no impact to the resources mentioned.

5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (Source: 1, 2, 3, 4, 5, 6, 12)	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (Source: 1, 2, 3, 4, 5, 6, 12)	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries? (Source: 1, 2, 3, 4, 5, 6, 12)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Monterey County Geographic Information System indicates the project site has a low archaeological sensitivity. The Project site has been utilized for agricultural cultivation and the discovery of archaeological resources or human remains has not been documented on the site. An Archaeological Resources Assessment Report was prepared by BASIN Research Associates on May 12, 2023 (Monterey County Library No. LIB230204; Source: 12). The following analysis is based on the analysis and conclusions of this report.

Cultural Resources (a) - No Impact:
In accordance with CEQA Guidelines Section 15064.5, a historical resource is one that is listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (CRHR). The historicity of sites is attributed by their contribution to California's pre-history and cultural heritage and distinctive characteristics they embody of the Millingstone, Middle, Middle/Late Transition, and Late Periods. Public Resources Code Section 21084.1 states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the

environment. The prepared Archaeological Resources Assessment Report conducted a surface investigation of the project site, which did not reveal any historic resources. In addition, the results of the California Historic Resources Information System (CHRIS) at the Northwest Information Center (NWIC) were negative for recorded historic-era cultural resources within 0.25 miles of the Project site. Further, none of the existing structures on site would be demolished with the implementation of the Proposed Project. As a result, the Proposed Project would have no impact on historical resources.

Cultural Resources (b) - Less Than Significant Impact with Mitigation:
Public Resources Code Section 21083.2 requires that lead agencies evaluate potential impacts to archaeological resources and determine whether a project may have a significant effect or cause a substantial adverse change in the significance of an archaeological resource. A Sacred Lands File request was made in March 2023, the results of which were negative. A records search through the California Historic Resources Information System's Northwest Information Center found no resources within the Project site. Further, the pedestrian survey was negative for surface indicators of potential subsurface cultural resources. The subject parcel is located within an area of low archaeological sensitivity as identified by the Monterey County Geographic Information System. The Proposed Project would involve approximately 4,700 cubic yards of cut to be balanced onsite. Although the Project site has been historically utilized for agricultural cultivation and discovery of archaeological resources or human remains has not been documented, construction activities could potentially impact previously unknown or buried archaeological resources. The possibility of disturbing previously unknown archaeological resources represents a potentially significant impact. The potential impact to archaeological resources would be less than significant with the implementation of standard County Condition of Approval PD003[B], **Mitigation Measure 2** (on-call archaeological monitor, as described below) and **Mitigation Measure 3** (onsite tribal monitor, as described in Section VI.18). Monterey County Condition of Approval PD003(A) requires work halt immediately in the event a cultural, archaeological, historical, or paleontological resource is uncovered during construction.

Mitigation Measure No. 2 –On-Call Archaeological Monitor:
To reduce potential impacts on cultural resources that may be discovered during development onsite, a qualified archaeological (i.e., an archaeologist registered with the Register of Professional Archaeologists [RPA] or a Registered Archaeologist [RA] under the supervision of an RPA) shall be retained as an on-call monitoring for the duration of all project-related ground-disturbing activities. If at any time, potentially significant archaeological resources or intact features are discovered, Condition of Approval PD003(A) shall be adhered to. The Archaeological Monitor shall review and evaluate any inadvertent discoveries to determine if they are historical resource(s) and/or unique archaeological resources or tribal cultural. resources under CEQA, and work in coordination with the Tribal Monitor (Mitigation Measure No. 3). If the Archaeological Monitor determines that any cultural resources exposed during construction constitute a historical resource and/or unique archaeological resource or tribal cultural resource under CEQA, he/she shall notify the project proponent and other appropriate parties of the evaluation. The Professional Archaeologist shall recommend mitigation measures to mitigate to a less-than significant impact in accordance with California Public Resources Code Section 15064.5. Tribal cultural resources shall be evaluated in accordance with Mitigation Measure No. 4. The contract shall require that the Archaeological Monitor keep a log of

inadvertent discoveries and submit a final report summarizing compliance actions with HCD-Planning.

Compliance Actions for Mitigation Measure No. 2:

2a: Prior to the issuance of permits from Building Services, the Applicant/Owner shall submit to HCD-Planning a copy of the contract between the Applicant/Owner and a qualified archaeologist. The contract shall include the requirements of this mitigation and specify that the archaeologist will be retained on an "on-call" basis for all ground disturbing construction to review, identify, and evaluate cultural resources that may be inadvertently exposed during construction.

2b: On an on-going basis, if archaeological resources are unexpectedly discovered during construction, work shall be halted on the parcel until the find can be evaluated and a plan of action formulated and implemented, with the concurrence of HCD-Planning. Data recovery shall be implemented during the construction and excavation monitoring. If intact archaeological features are exposed, they shall be screened for data recovery using the appropriate method for site and soil conditions. The Applicant/Owner shall allow the on-site Tribal Monitor (see Mitigation Measure No. 3 – Section VI.18) an opportunity to make recommendations for the disposition of potentially significant archaeological materials found.

2c: Prior to final of construction permits, a final technical report containing the results of all analyses shall be completed within one year following completion of the field work. This report shall be submitted to HCD-Planning and the Northwest Regional Information Center at Sonoma State University.

Cultural Resources (c) - Less Than Significant Impact:

No human remains, including those interred outside of a formal cemetery, are known to occur on the Project site. The Proposed Project would occur on a previously disturbed site that has been extensively disturbed in connection with the existing agricultural use. As a result, finding human remains during construction would be unlikely. Nevertheless, while unlikely, the Proposed Project could impact previously unknown human remains. The implementation of a standard Monterey County Condition of Approval requiring that work halt in the event of the discovery of any human remains would ensure less than significant impacts. This condition further requires that no excavation or ground-disturbing activities shall occur at the site or nearby area until the Monterey County coroner has been contacted in accordance with §7050.5 of the California Health and Safety Code. If the coroner determines that the human remains are of Native American origin, the appropriate Native American tribe shall be contacted to provide recommendations for the disposition of the remains. Work shall not resume in the immediate area of the discovery until such time as the remains have been appropriately removed from the site. For these reasons, this represents a less than significant impact.

6. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Source: 1, 2, 3, 4, 5)	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☒	☐

Discussion/Conclusion:

Pacific Gas and Electric Company (PG&E) has historically been the primary electricity provider for the County. Monterey County customers now receive their electricity from Central Coast Community Energy (C3E) (previously known as Monterey Bay Community Power [MBCP]), which is a community choice energy agency that has committed to providing its customers with 100% carbon-free energy by the year 2030. Community choice energy agencies allow local governments to procure power on behalf of their residents, businesses, and municipal accounts from an alternative supplier while still receiving transmission and distribution service from their existing utility provider (in this case, the PG&E). This is typically an attractive option for communities that want more local control over their electricity sources, more clean energy than is offered by their default utility, and/or lower electricity prices. Per Public Utilities Code Section 366.2, customers have the right to opt out of the community choice energy program and continue to receive service from the incumbent utility (PG&E) if they so choose.

The California Building Code (CBC) contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvements to real property. The CBC includes mandatory green building standards for residential and nonresidential structures, the most recent version of which is referred to as the 2019 Building Energy Efficiency Standards (effective January 1, 2020). These standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements. The County has not adopted a climate action plan; however, the Conservation and Open Space Element includes a goal to promote efficient energy use. The Conservation and Open Space Element also identifies energy conservation policies, including encouraging the use of innovative site and building orientation and landscaping to maximize energy efficiency, fuel efficiency standards, and encouraging development of alternative energy sources. Current measures applied in the County include energy-conserving building standards, recycling, and transportation system improvements. The 2010 General Plan also requires new development shall be located and designed with convenient access and efficient transportation for all intended users and, where possible, consider alternative transportation modes.

Energy (a) - Less Than Significant Impact:

During construction (approximately 12 months) of the Proposed Project, fossil fuels, electricity, and natural gas would be used by construction vehicles and equipment. The energy consumed during construction would be temporary in nature and would be typical of other similar construction activities in the county. Federal and state regulations in place require fuel-efficient equipment and vehicles and prohibit wasteful activities, such as diesel idling. Therefore, construction energy use impacts would be less than significant.

Operational mobile-source energy consumption would be primarily associated with vehicle trips to and from the Proposed Project. The development of increasingly efficient automobile engines would result in increased energy efficiency and energy conservation. Furthermore, it is important to note that the Applicant/Owner would provide all necessary transportation, via busses, for residents of the proposed agricultural employee housing apartments, including transportation to and from the agricultural work sites and for private/recreational purposes. Therefore, Proposed Project mobile vehicle trips would not result in increased fuel usage that would be considered unnecessary, inefficient, or wasteful.

The Proposed Project would result in increased electricity and natural gas consumption associated with the long-term operation of the proposed land uses. Development on the Project site would be required to be designed and constructed in compliance with the CBC, which requires that the project achieves high energy efficiency, including, but not limited to, use of low-flow, energy efficient appliances, light emitting diode (LED) lighting, insulation and building material standards, etc. Development would rely on the local electricity service provider C3E to supply project electricity needs and PG&E as a service provider for natural gas, which is committed to replacing its traditional natural gas supply with renewable natural gas. Therefore, the Proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources and impacts would be less than significant.

Energy (a) - Less Than Significant Impact:

The Proposed Project would comply with existing state energy standards and would not conflict with or obstruct a state or local plan for renewable energy or energy-efficiency. The Proposed Project would be designed to comply with the California Green Building Code, Title 24 energy efficiency requirements, 2022 California Building Energy Standards requirements and Assembly Bill (AB) 1881 water-efficient landscape requirements. The Proposed Project would not conflict with other goals and policies set forth in General Plan pertaining to renewable energy and energy efficiency. Therefore, potential impacts associated with conflict with a state or local plan for renewable energy or energy efficiency would be less than significant.

7. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source:) Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking? (Source: 1, 2, 3, 4, 5, 6, 13)	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction? (Source: 1, 2, 3, 4, 5, 6, 13)	☐	☐	☒	☐
iv) Landslides? (Source: 1, 2, 3, 4, 5, 6, 13)	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil? (Source: 1, 2, 3, 4, 5, 6, 13, 16)	☐	☐	☒	☐
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? (Source: 1, 2, 3, 4, 5, 6, 13)	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Chapter 18A of the 2007 California Building Code, creating substantial risks to life or property? (Source: 1, 2, 3, 4, 5, 6, 13)	☐	☐	☒	☐
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? (Source: 1, 2, 3, 4, 5, 6, 13)	☐	☐	☐	☒
f) Directly or indirectly destroy a paleontological resource or site or unique geologic feature? (Source: 1, 2, 3, 4, 5, 6, 11, 13)	☐	☐	☐	☒

Discussion:

The Project site is approximately 5.24 acres in size, is mostly flat, and is currently used for row crop agricultural purposes. According to the Monterey County Geographic Information System (GIS), the project site is located in Seismic Zone II which is considered a low seismic hazard

zone. The Proposed Project would require grading for foundation preparation and introduce new residential housing and associated impervious surfaces. A Geotechnical and Infiltration Investigation Report prepared by Grice Engineering, Inc. in May 2023 (Monterey County Library No. LIB230232; Source:13]. The Geotechnical Report determined that the Project site is underlain by relatively strong soils that are considered resistant to lateral spreading. The native soil consists of sandy clays with medium plasticity and is typical to the surrounding area. As detailed in the Geotechnical Report and Monterey County GIS, the Project site is located in an area of low earthquake and landslide potential and low liquefaction potential. As such, the report concluded that the Project site is considered suitable for the proposed development.

Geology and Soils (ai-aiv) - Less Than Significant Impact:

Based on Monterey County GIS, and per the prepared Geotechnical Report, the Project site is not located within the Alquist-Priolo Earthquake Zones. The nearest active fault, the Gabilan Creek fault, is located approximately 4.5 miles east of the Project site. The most active is the San Andreas Rift System (Creeping Segment), located approximately 11.29 miles northeast. Other fault zones in the area include the Monterey Bay-Tularcitos Fault Zone (located approximately 15.07 miles southwest), the Rinconada Fault Zone, approximately 5.12 miles to the southwest, the San Gregorio-Palo Colorado (Sur) Fault Zone, approximately 24.31 miles to the southwest, and the Zayante-Vergeles Fault Zone, approximately 9.64 miles to the northeast. These zones are not as liable to rupture as the San Andreas Fault and a seismic event at any of the above fault zones would likely produce earth movements of a lesser intensity at the site. No known fault lines cross the property and the potential for ground rupture is very low. Monterey County, including the Project site, is in a seismically active area of California and thus the Proposed Project is expected to have the potential to expose people and/or structures to seismic hazards at some point. The Proposed Project would be required to comply with California Building Code seismic design standards. In addition, the final design of the Proposed Project would be required to comply with the recommendations of a design-level geotechnical investigation. As a result, potential impacts due to seismic hazards would be minimized.

According to the Geotechnical Report and Monterey County GIS, the Project site soils are considered not susceptible to liquefaction as they are unsaturated and generally cohesive clastic clay. Further, the Project site is located 5.12 miles to the northeast of the Rinconada Fault. Grice Engineering's site inspection did not reveal any surface features indicating a fault rupture had occurred at the site. The existing structures, driveways and roads did not reveal any strains which would be attributable to subsurface lateral or vertical displacements resulting from a fault slip. Additionally, the Project site is underlain with soils that are considered resistant to lateral spreading. The Geotechnical Report found no groundwater during auger testing at the Project site. The Project site is relatively flat and according to Monterey County GIS and the prepared Geotechnical Report, the Project site is located within an area where the potential for landslides is low and not susceptible to slope failure. All recommendations of the Geotechnical Report are required to be implemented into the final construction plans pursuant to Monterey County Code section 16.080.110. As a result, the proposed project would be unlikely to result in loss of life, injury, or property damage from liquefaction.

Geology and Soils (b) - Less Than Significant Impact:
The Project site's native topsoil is a clay of medium plasticity. Due to tillage from agricultural practices, the near surface soils across most of the Project site are loose to an approximate depth of four feet. Per the Geotechnical Report, disturbing native vegetation and natural soils could result in soil erosion and increased sedimentation. Measures are needed to control erosion during and after construction. Therefore, all cut and fill slopes, as well as disturbed soil areas, must be seeded with grass or landscape plants for erosion control and to prevent sloughing soil from blocking drainage patterns at the project site. Excavation activities would involve approximately 4,700 cubic yards of cut and fill to be balanced on site. The recommended erosion control measures shall be taken during and at completion of grading and during construction operations. The Proposed Project would be required to comply with Chapter 16.12, *Erosion Control*, of the Monterey County Code. This chapter sets forth required provisions for project planning, preparation of erosion control plans, runoff control, land clearing, and winter operations; and establishes procedures for administering those provisions. Silt fencing and straw wattle, designed to contain stormwater runoff, would be placed along the perimeter of the project site. Measures to control dust, such as site watering and the covering of all trucks hauling soil, sand or other lose material, would also be implemented.

The applicant submitted a Preliminary Stormwater Control Plan (PSWCP), prepared by Whitson Engineers, Inc. (June 30, 2023) (Source: 16). Per the PSWCP, the proposed project design includes Stormwater Control Measures (SCMs) in order to meet the Post-Construction Stormwater Management Requirements (PCRs). The Proposed Project includes installation of three bio-retention features to receive and convey stormwater to the City's existing stormwater system located along Sconberg Parkway. In addition, standard construction phase BMPs related to erosion would be implemented to minimize erosion impacts during construction. Therefore, as designed, the water quality of stormwater discharging from the Project site would meet County and State standards and would not degrade the quality any nearby waterway.

All recommendations provided by the Geotechnical Report would be required to be implemented into the final construction plans pursuant to Monterey County Code Chapter 16.08. Therefore, the Proposed Project would represent a less than significant impact relative to erosion or loss of topsoil.

Geology and Soils (c) - Less Than Significant Impact:
As stated in the analyzed under Section 7(a) above, the results of the Geotechnical Report indicate the Proposed Project does not contain soil and geological hazards that could result in lateral spreading, subsidence, or liquefaction, which could damage proposed structures. There is low risk of lateral spreading, landslide, subsidence or collapse. Liquefaction risks are considered low during significant seismic events. Further, all recommendations provided by the Geotechnical Report would be required to be implemented into the final construction plans pursuant to Monterey County Code Chapter 16.08. The Proposed Project impacts would be less than significant.

Geology and Soils (d) - Less Than Significant Impact:
The results of the Geotechnical Report indicate that there are moderately expansive soils near the surface of the Project Site in addition to loose surface soil conditions. The Geotechnical Report

concluded that these expansive soils have not been influential on the subject property's existing structures (constructed in the 1940s and 60s) and there are no known problems with expansive soils in this area of the County. The Geotechnical Report determined that the Project site is suitable for the Proposed Project. As described above, the final construction plans would be required to comply with 2022 California Boiling Code and incorporate all recommendations of the Geotechnical Report pursuant to Monterey County Code Chapter 16.08. Therefore, the Proposed Project would have a less than significant impact with respect to being located on expansive soils.

Geology and Soils (e) – No Impact:

The Proposed Project would connect to the City of Salinas's wastewater system. The Proposed Project also includes demolition of the existing septic systems serving the property's existing laundry room and 16 agriculture employee housing units. These structures would then also be connected to the City of Salinas's sewer main. The property's six farmworker single-family dwellings would continue to be served by induvial septic systems after the implementation of the Proposed Project. Therefore, the Proposed Project would not require the installation of septic systems or alternate wastewater treatment facilities, resulting in a less than significant impact.

Geology and Soils (f) – No Impact:

The Project site is flat and has been historically used for commercial agricultural row crop purposes. There are no unique geological features at the site. Additionally, the agricultural practices have included disking the land and disturbing the top 2 to 3 feet of soil over the course of many years. Geotechnical borings indicate that the topsoil contains clay and no bone or fossils identified (Source: 13). The Project Site is not listed within an area identified as containing paleontological resources nor is it located in close proximity to any known paleontological resources. The Proposed Project would not impact any paleontological resources.

8. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Source: 1, 2, 3, 4, 5, 6, 8, 9, 10)	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Source: 1, 2, 3, 4, 5, 6, 8, 9, 10)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Various gases in the earth's atmosphere, when exceeding the naturally occurring or 'background' levels due to human activity, create a warming or greenhouse effect, and are classified as atmospheric greenhouse gases ("GHGs"). Among the prominent GHGs contributing to the greenhouse effect, or climate change, are carbon dioxide ("CO_2"), methane ("CH_4"), ozone ("O_3"), water vapor, nitrous oxide ("N_2O"), and chlorofluorocarbons ("CFCs"). Human-caused

emissions of these GHGs in excess of natural ambient concentrations are responsible for the greenhouse effect. In California, the transportation sector is the largest emitter of GHGs.

MBARD has not yet adopted a threshold for construction related GHG emissions but recommends utilizing thresholds set by neighboring districts (e.g., Sacramento Metropolitan Air Quality Management District ["SMAQMD"]). SMAQMD adopted an updated threshold based on the 2030 target year in April 2020. According to SMAQMD, a Project would result in a significant GHG related impact if the project would emit more than 1,100 metric tons of Carbon Dioxide equivalent-CO_2e ("$MTOCO_2e$") per year. Operation of a stationary source project would not have a significant GHG impact if the project emits less than 10,000 $MTOCO_2e$.

Greenhouse Gas Emissions (a) - Less than Significant Impact:

The Proposed Project is in the NCCAB, where air quality is regulated by MBARD. As discussed above, if a project emits less than 1,100 $MTOCO_2e$ per year, its GHG emissions impact would be less than significant. The Proposed Project would generate temporary construction related GHG emissions during construction of the proposed farmworker housing apartments and associated site improvements.

Short-Term Construction Emissions

As detailed in the prepared Air Quality report (Monterey County Library No. LIB230233; Source: 10), construction of the proposed project, which would take place over approximately 12 months, would generate an estimated total of 209 Metric Tons (MT) of CO_2e. There would also be a minimal amount of GHG emissions from waste generated during construction. Construction-generated emissions would vary daily, depending on the final construction schedules, equipment required, and activities conducted. Therefore, the Proposed Project would have a less than significant impact related to generation of construction-period GHG emissions.

Long-Term Operational Emissions

Operational GHG emissions for the proposed project are also summarized in the prepared Air Quality report (Source: 10). The Proposed Project would generate a total of approximately 338 MTCO2*e*/year during operations. Project-generated GHG emissions are projected to decrease in future years due largely to improvements in vehicle fleet emissions. With the anticipated 361 residents, the Proposed Project would generate approximately 0.94 MTCO2e/year for each resident. The Proposed Project would have a less than significant impact related to generation of operational-period GHG emissions when applying the SMAQMD threshold of 10,000 MT of CO_2e per year.

Greenhouse Gas Emissions (b) - Less than Significant Impact:

As described above, the Proposed Project is not expected to generate GHG emissions that would exceed applicable thresholds. Therefore, the Proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases and represents a less than significant impact.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Source: 1, 2, 3, 4, 5, 6, 14, 26)	☐	☐	☒	☐
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? (Source: 1, 2, 3, 4, 5, 6, 14, 26)	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Source: 1, 2, 3, 4, 5, 6, 14, 26)	☐	☐	☒	☐
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? (Source: 1, 2, 3, 4, 5, 6, 14, 15, 26)	☐	☐	☐	☒
e) For a project located within 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 result in a safety hazard or excessive noise for people residing or working in the project area? (Source: 1, 2, 3, 4, 5, 6, 14, 26, 17, 35, 36)	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Source: 1, 2, 3, 4, 5, 6, 14, 26)	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Source: 1, 2, 3, 4, 5, 6, 14, 26)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation

Hazardous materials, as defined by the California Code of Regulations, are substances with certain physical properties that may pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. Hazardous materials and waste can result in public health hazards if improperly handled, released into the soil, or groundwater, or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory

levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer.

The Hazardous Waste and Substances Site ("Cortese") List is a planning tool used by the state, local agencies, and developers to comply with CEQA requirements related to the disclosure of information about the location of hazardous materials release sites. California Government Code Section 65962.5 requires the California EPA ("CalEPA") to develop at least annually an updated Cortese List. Various state and local government agencies are required to track and document hazardous material release information for the Cortese List. There are no hazardous materials release sites in the vicinity of the Project site. Similarly, according to the California Department of Toxic Substances Control's ("DTSC") EnviroStor database, there are no contaminated sites within the vicinity of the Project site.

A Phase I Environmental Site Assessment (ESA) was prepared for the Proposed Project by CapRock Geology, Inc., April 5, 2023 (Source: 14). The purpose of this assessment was to identify potential for on-site hazardous materials/waste and/or petroleum contamination (Recognized Environmental Conditions [RECs][1]) at the subject property. The ESA Phase I included an analysis of historical information of the past and present uses of the site with regard to the potential for RECs and provides necessary conclusions and recommendations. CapRock also prepared a Phase II ESA/Soil Investigation, dated June 7, 2023, (Source: 24), which summarized the results of soil sampling for hydrocarbons, volatile organic compounds (VOC), pesticides, and metals. Information contained in this section was derived from the Phase I and II ESAs.

General Site Reconnaissance

The Phase I ESA determined that the subject property has been cultivated with row crops for at least 86 years (commencing in approximately 1937). Chemicals related to growing crops, such as fertilizers, herbicides, and pesticides, may have been applied to the subject property for historic and current agricultural activities and thus may be present within the Project site's soils. Spills of such chemicals may have occurred in the past but there are no reports of any environmental releases or spills. No hazardous wastes are generated on-site. Asbestos was banned from use in building construction in the 1970s. The subject property's existing structures were built in the 1940s and late 1960s and therefore may contain asbestos or lead paint. However, no comprehensive surveys for asbestos or lead-based paint were conducted as the Proposed Project would not involve the demolition of any existing structures.

Low levels of persistent pesticides, such as dichlorodiphenyltrichloroethane (DDT), are common in the Salinas Valley. Pesticide exposure to future residents of the site is a concern. To determine the levels of potentially hazardous materials residing in the soil, soil testing was conducted. Additionally, due to the proximity of Hansen Farm's underground storage tanks, a Phase II ESA was prepared by CapRock Geology, Inc. on June 7, 2023. The site is not known to have been a hazardous waste disposal site, hazardous substance release site, or a landfill. Groundwater beneath the subject property is relatively deep, approximately 60 to 70 feet below ground

[1] The ESA is governed by provision of ASTM International Designation E 1527-13, Standard Practice for Environmental Site Assessments and 40 CFR Part 312, Standards and Practices for All Appropriate Inquiries; Final Rule.

surface. However, regional groundwater pumping associated with agricultural production activities may influence groundwater depth and flow direction at various times of the year. The chemical test results from soil samples collected during this investigation were evaluated in part using the Environmental Screening Levels (ESLs) established by the San Francisco Bay Regional Water Quality Control Board (Water Board, January 2019).

Historical Aerial and Topographic Map Review

CapRock reviewed aerial photographs of the site taken between 1937 to 2016 to evaluate changes in land use and areas of potential environmental concern. No concerns were noted. A Chain of Title was reviewed, and no environmental liens were found for the property and the California Department of Oil and Gas has no well drilling records for oil or gas.

Government Agency/Document Review

CapRock conducted a search of federal and State government databases and identified 12 locations of potential concern, none of which were on the subject property. These sites were assessed based on their relative location/ elevation to the subject property and their regulatory status. CapRock found that these sites are not anticipated to pose a potential environmental concern to the subject property, except for the underground storage tanks located at 1941 Alisal Road, Salinas (Hansen Farms Headquarters).

Soil Sampling

VOCS and total petroleum hydrocarbons (TPH) were not detected above their laboratory reporting limits. Two organochloride pesticides, dichlorodiphenyldichloroethylene (DDE) and dichlorodiphenyltrichloroethane (DDT), were detected in sampled soils. DDT is a toxic pesticide that was once widely used to control pests on agricultural crops and insects that carry diseases like malaria and typhus. During the biodegradation of DDT, both DDE and dichlorodiphenyldichloroethane (DDD) are formed in soils. DDT was detected in all eight of the surficial soil samples above the Tier 1 Environmental Screening Level (ESL) (1.10 ug/kg) with a maximum concentration of 49 ug/kg. However, the residential land use ESL for DDT (1,900 ug/kg) was not exceeded in any of the samples. DDE was detected in all eight of the surficial soil samples, but was not detected above the Tier 1 ESL (330 ug/kg) with a maximum concentration of 43 ug/kg, which is also below the residential land use ESL for DDE (1,800 ug/kg). None of the samples exceeded the Department of Toxic Substances Control's (DTSC) recommended screening levels for soil.

Soil samples were also tested for the presence of metals; laboratory analysis determined that nine metals were detected in the soils at the site: Arsenic, Barium, Chromium, Cobalt, Copper, Lead, Nickel, Vanadium, and Zinc. Of these, seven were found to have maximum concentrations below their respective Tier 1 ESLs. Arsenic was detected above laboratory detection limits in eight of the samples at a maximum concentration of 6.2 mg/kg, which exceeds the residential land use ESL of 0.067 mg/kg. These levels are considered to be near the standard background concentrations for northern California. Vanadium was found to exceed the Tier 1 ESL in eleven of the soil samples. The highest concentration of Vanadium detected was 25 mg/kg, exceeding the ESL of 18 mg/kg. The residential land use ESL for Vanadium (390 ug/kg) was not exceeded in any of the samples. As a result, the Phase II ESA/Soil Investigation did not recommend any further remediation for soil contamination.

Hazards and Hazardous Materials (a), (b), and (c) - Less Than Significant Impact:
The Proposed Project would be used for residential purposes and would not require the routine storage, transport, or disposal of hazardous materials. However, construction of the Proposed Project would require the use and transport of materials commonly used in construction activities. In accordance with County application submittal requirements, a Hazardous Material Questionnaire was completed for the Proposed Project (Source: 1). The questionnaire identifies that the operation of the Proposed Project would not involve the use or storage of hazardous materials (oil, fuels, solvents, compressed gases, acids, corrosives, pesticides, fertilizers, paints) or acutely hazardous materials (ammonia, chlorine, sulfuric acid, formaldehyde, hydrogen peroxide, methyl bromide or other restricted pesticides) nor would it generate hazardous waste or hazardous air emissions.

However, the Proposed Project would entail the use of hazardous materials (e.g., fuel, cleaning materials, etc.) during construction. The types and amounts of hazardous materials used would vary according to the type of activity. It is unlikely that construction of the Proposed Project would create a significant impact due to the routine transport, use, or disposal of hazardous materials in part due to the size and temporary nature of construction. However, the handling transport, use, and disposal of hazardous materials must comply with all applicable federal, state, and local agencies and regulations, including the Department of Toxic Substances Control; Occupational Health and Safety Administration (OSHA); California Department of Transportation (Caltrans); and the Monterey County Health Department - Hazardous Materials Management Services. Any handling of hazardous materials would be limited to the quantities and concentrations set forth by the manufacturer and/or applicable regulations, and all hazardous materials would be securely stored in a construction staging area or similar designated location within the Project site.

Bardin Elementary School and Hartnell College's Alisal Campus are located within 0.25 miles of the Project site. The Proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. However, as described above, construction activities would have temporary impacts within the vicinity of the Project site. In accordance with General Plan Policy AG-1.2 and Monterey County Code section 21.66.030.F.2(a), the Project has been designed to include a 200-foot buffer, which would be conveyed to the County as an easement though a condition of approval. The buffer would protect the existing surrounding agriculture land and reduce the effect of agricultural operations on the proposed residential use.

In summary, potential temporary and operational impacts have been addressed through the Proposed Project's design and conditions of approval. Therefore, the Proposed Project would not create a significant hazard to the public, schools or environment and would result in a less than significant impact.

Hazards and Hazardous Materials (d) - Less than Significant Impact:
The proposed project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and the Phase I and II ESA concluded

that the locations of potential concern identified through CapRock's database review would not pose a potential environmental concern to the subject property.

Based on a review of aerial photographs, the Project site has been cultivated for agricultural purposes for at least 86 years. Persistent pesticides such as DDT, among others, have been applied during the normal course of the property's agricultural operations. A possible presence of residual agricultural chemicals in site soil was acknowledged in the Phase I ESA. The Phase II ESA included the collection and analysis of soil samples to evaluate if residual chemicals are present in surficial soils and if remediation is required prior to construction. Soil sampling found that residual DDT, as well as its by-products DDD and DDE, were below their respective thresholds for residential ESLs. The Phase II ESA concluded that metals and pesticides detected at the site are within normal background levels for the Monterey Bay area, with the exception of arsenic. However, this level of arsenic contamination is considered within or near the standard background concentrations for arsenic in northern California. Construction workers at the site could be exposed to dust particles disturbed as a result of construction activities. With implementation of standard dust control measures, as required by Monterey County Chapter 16.08, this would be reduced to a less than significant impact.

Hazards and Hazardous Materials (e) - Less than Significant Impact:
Properties within the Airport Influence Area of the Salinas Municipal Airport are subject to the 1982 Airport Land Use Plan (ALUP) (Source: 35). The ALUP does not establish different safety zones within the Airport Influence Area for the Salinas Municipal Airport, and therefore the safety zone map prepared by the California Department of Aeronautics' (DOA) in 2012 was used for this analysis. The prepared safety zone map is based on Caltrans Airport Land Use Handbook (ALUH) and establishes the approximate safety zone boundaries for the Salinas Municipal Airport. Accordingly, the subject property is located within Safety Zone 6 (Traffic Pattern Zone) and outside of the ALUP's Building Restriction Zone (Diagram A of the ALUP). Safety Zone 6 prohibits hazards to flight and very high intensity uses such as sports stadiums but allows for residential uses at all densities. The proposed residential development would have a ridge height of approximately 29 feet 6 inches. At the proposed height, the development would not encroach into the imaginary surfaces (Part 77, Diagram B of the ALUP). The Proposed Project would be required to install low-level down-lit exterior lighting (see Condition No. ALUC-6 of ALUC Resolution No. 23-011; Source: 36) and receipt of a No Hazard Determination from the FAA (see Condition No. ALUC-9). The No Hazard Determination would certify that the Proposed Project would not negatively or adversely affect the airspace or flying public by way of glare, lighting, or height. Given that the Project site is located within the Traffic Pattern Zone (Safety Zone 6) and partially within the Local Flight Pattern of Runway 8-26, Condition No. ALUC-1 would require that the Applicant/Owner grant an Avigation Easement over the Project site to the Salinas Airport. As proposed and conditioned, the Proposed Project would not create a safety hazard and would interfere with airspace protection.

The Proposed Project was reviewed for consistency with Map 6 of the ALUP (2000 Community Noise Equivalent Level [CNELs] Noise Contours). The subject property is located of, but near the 55 to 65 CNEL contours. Per Diagram E and D of the ALUP, although the subject property is not located within an area subject to higher noise levels (i.e. imagery surface of noise exposure), it is partially located within the Local Flight Pattern of Runway 8-26 and 13-31 and thus would

be subject to similar considerations as those given to imaginary surfaces and may be exposed to additional "noise, vibration and psychological trepidation" (ALUP, page 62). Nevertheless, Diagram D of the ALUP dictates residential uses in this flight pattern are compatible uses and not considered environmentally sensitive land uses. Per Chapter 3.2.1 of the ALUH, the proposed residential use would be considered a noise-incompatible use if no mitigation measures were incorporated to reduce interior noise levels to a level acceptable under the California Building Code. Although the subject property is located outside of the ALUP identified 65 CNEL boundary and more than 3,500 feet northeast of the Airport, an Acoustical Analysis (Monterey County Library No. LIB230208; Source: 17) was prepared. The acoustical engineer determined that the exterior facades of the proposed development may be exposed to CNEL between 56 and 64 decibels. The Proposed Project is expected to be exposed to greater, more significant levels of overflight noise and low-altitude overflight during the Airport's annual California International Airshow. Based on the 2023 California International Airshow performance map, the development site is located outside of but immediately adjacent to the demonstration area (743-acre area).

To accommodate and be resilient to over-flight noise exposure, the Proposed Project would be required to be designed and constructed so that interior noise levels do not exceed 45 dBA (see Condition No. ALUC-3). Application of this condition is consistent with the recommendations of the Salinas Airport Manager and the standards set forth in the 2022 California Building Code, which requires that residential habitable spaces, specifically where the exterior CNEL is 60 dBA or higher, be designed so that the interior noise level attributable to exterior sources does not exceed 45 dBA CNEL when doors and windows are closed. As designed and conditioned, the Proposed Project would maintain interior noise levels of no more than 45 dBA and therefore would not expose people residing within the farmworker housing to excessive noise.

Hazards and Hazardous Materials (f) and (g) – No Impact:

The subject property is located at the corner of Alisal Road and Sconberg Parkway. Alisal Road is identified as an Evacuation Route per the 2010 General Plan – Safety Element, Table S-1. Therefore, the Proposed Project would not impede an adopted emergency response or evacuation plans. The Project site is not located within a State Responsibility Area Fire Hazard Zone or Very High Fire Hazard Severity Zone and would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. In addition, the Proposed Project would be designed to incorporate all Fire Code requirements. Therefore, the Project would result in no impact relative to known hazardous sites, emergency response or evacuation plans, or wildland fires.

10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? (Source: 1, 2, 3, 4, 5, 6, 16, 17, 18)	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (Source: 1, 2, 3, 4, 5, 6, 16, 17, 18, 27, 29)	☐	☐	☒	☐
c) Substantially alter the exiting 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:	☐	☒	☐	☐
i) Result in substantial erosion or siltation on or off site. (Source: 1, 2, 3, 4, 5, 6, 16, 17)	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite. (Source: 1, 2, 3, 4, 5, 6, 16, 17)	☐	☐	☒	☐
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 (Source: 1, 2, 3, 4, 5, 6, 16)	☐	☐	☒	☐
iv) Impede or redirect flood flows? (Source: 1, 2, 3, 4, 5, 6, 16, 25, 26)	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (Source: 1, 2, 3, 4, 5, 6, 16)	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (Source: 1, 2, 3, 4, 5, 6, 16)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation

A Preliminary Stormwater Control Plan (PSWCP) was prepared by Whitson Engineers, Inc. (June 30, 2023) for the Proposed Project (Source: 16). The goal of a stormwater control plan is to protect overall water quality during construction activities. The SWCP summarizes the proposed project's proposed stormwater management strategy pursuant to the Post Construction Stormwater Management Requirements for Development Projects in the Central Coast Region. The prepared PSWCP summarizes the Proposed Project's proposed stormwater management

strategy pursuant to the Post Construction Stormwater Management Requirements for Development Projects in the Central Coast Region, Central Coast Regional Water Quality Control Board Resolution No. R3-2013-0032, and the guidance documents promulgated by the Monterey Regional Stormwater Management Plan (MRSWMP). This section is based on the contents and conclusions of the PSWCP. Preparation of a final Stormwater Control Plan would be required as a condition of approval and subject to review and approval by HCD-Engineering Services. The Project site is not located within Monterey County's Municipal Separate Storm Sewer System (MS4) Area and is not subject to the Regional Post-Construction Requirements (PCRs) (CCRWQCB Resolution No. R3-2013-0032). The Project would be subject to the post-construction requirements found in the Construction General Permit (CGP) (Order No. 2009-0009-DWQ). Therefore, a Municipal General Permit would be required through application of a standard condition of approval.

The Project site is located entirely within the Salinas Valley – East Side Aquifer, which is managed by the Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA). The East Side Aquifer Subbasin is part of the overall Salinas Valley Groundwater Basin (SVGB). Groundwater accounts for approximately 99.7 percent of the SVGB's water supply. The SVGB is designated as a medium-priority basin and is not designated as being critically over-drafted.

SVGSA is a Joint Powers Authority with membership comprising the County of Monterey, Monterey County Water Resources Agency (MCWRA), City of Salinas, City of Soledad, City of Gonzales, City of King, Castroville Community Services District, and Monterey One Water (M1W).

The Project site is located within Alco Water Service's (Alco's) Salinas Division's California Public Utilities Commission (CPUC) service area. Alco's Salinas Division serves potable water to the northeastern portion of the City of Salinas (334 commercial service connections and 8,798 residential service connections). The Alco water system is regulated by the State Water Resources Control Board and Monterey County Environmental Health Department. The Alco water system relies entirely on nine active groundwater wells that are drawing water from the Salinas Valley Groundwater Basin. A "Can and Will Serve" letter has been issued by Alco Water (dated January 18, 2023; Source: 20) confirming that it can and will serve potable water to the Project site. The Proposed Project would connect to the existing water system. A Water Demand memorandum was prepared by Schaaf & Wheeler (revised September 2023) to quantify the subject property's historical water demand and the Proposed Project's water demand (Source: 25). This section is based on the contents and conclusions of this memorandum.

Hydrology and Water Quality (a) and (b) - Less than Significant Impact:

Construction and operation of the Proposed Project would not violate any water quality standards or waste discharge requirements. Water used during construction would be used primarily for dust suppression and would be sourced by an on-site well which is currently being used for dust suppression in relation to the existing agricultural operations. The on-site well would be used for dust suppression on an ongoing basis throughout the subject property and therefore, the Proposed Project would not decrease groundwater supplies. The Proposed Project would be constructed per the requirements of the Construction General Permit (CGP). A Storm Water Pollution Prevention Plan (SWPPP) would be required as a condition of approval, and that plan would

incorporate Best Management Practices (BMPs), visual monitoring, Rain Event Action Plan (REAP), and Construction Site Monitoring Program (CSMP) requirements (as applicable) to comply with the CGP. With the implementation of the BMPs outlined in the SWPPP, the potential for the degradation of water quality during construction would be addressed. Potable water would be provided by Alco for operation of the Proposed Project. The Alco water system is subject to Monterey County Code Chapter 19.10.050. Sewage services would be provided by the City of Salinas, which is subject to Municipal Code sections 31-902.3 and 31-902.4. Adherence to the requirements of Monterey County Code and City of Salinas Municipal Code would ensure that the Proposed Project would operate in a manner that would not violate any water standards or waste discharge requirements. For these reasons, the Proposed Project would not substantially degrade surface and groundwater quality, resulting in a less-than-significant impact.

As described above, the Alco water system supply is sourced from groundwater extractions pumped from the Salinas Valley Groundwater Basin. Alco water has issued the Proposed Project a "Can-and-Will-Serve" letter, indicating that the Proposed Project would have a reliable source of water supply.

Historical Water Use
The subject property is utilized primarily for row crop production and has historically used groundwater for crop production for approximately 86 years. The Project site is currently in agricultural row-crop production. Per the prepared Water Demand memorandum, which utilizes water demand and crop production information provided by Bengard Ranch (current site grower), water use over the last 10 years ranges between 2.6-acre feet per year (AFY)/acre and 5.3 AFY/acre, depending upon the annual rainfall. Using the 10-year average water use of 3.98 AFY/acre, the existing water demand for the row crop irrigation on the Project site (5.24 acres, inclusive of 1.44-acres of agricultural buffer zones) is estimated to be 20.9 AFY. Overall water use of groundwater on the site (i.e., extraction from on-site wells) would be reduced by approximately 20.9 AFY with implementation of the Proposed Project because the Alco water would supply the Project's water demand. See below.

Proposed Water Demand
As described in more detail below in Section 19(b), the Proposed Project's projected water demand of 13.2 AFY represents a 7.7 AFY decrease over the existing historic demand (20.9 AFY). based on water use data for the last ten years as provided by the property owner. Therefore, the Proposed Project would not substantially decrease groundwater supplies.

Long Term Water Supply
The subject property is located within the East Side Aquifer Subbasin, which is within the Salinas Valley Groundwater Basin (SVGB). Groundwater uses within the East Side Aquifer Subbasin are 15% urban and 85% agricultural. Although the SVGB is designated as a medium-priority basin and is not designated as being critically over-drafted, the Salinas Valley – East Side Aquifer subbasin is currently in overdraft (groundwater pumping exceeds net inflows).

The Proposed Project site is in agricultural use and has historically used groundwater for crop production. Based on the acreage of the site, the types of crops grown on the site, and assuming

that cultivation occurs on the property for approximately 9 months out of the year, the current average water demand for crop irrigation is approximately 20.9 AFY (baseline conditions). Water to irrigate the agricultural operation of the subject property is supplied by a private well that draws from the same East Side Aquifer Subbasin. Therefore, because the Project site has been in agricultural production for approximately 86 years and relies on wells drawing from the Subbasin, the Project site's historical water use (20.9 AFY) is included in the historic groundwater overdraft conditions of the East Side Aquifer Subbasin.

In order to approve the Proposed Project, the 2010 Monterey County General Plan requires proof that a long-term, sustainable water supply, both in quality and quantity exists to serve the development. In addition to the policies of the 2010 General Plan and pursuant to the Sustainable Groundwater Management Act (SGMA), the SVGSA was formed to manage existing and supplemental water supplies efficiently and economically in order to prevent further increase in, and to accomplish continuing reduction of, long-term overdraft and to provide and ensure sufficient water supplies for present and anticipated needs within its boundaries. The SVBGSA exercises full or partial management control of six of the nine subbasins that make up the SVGB. The SVBGSA adopted the Groundwater Sustainability Plan (GSP) for the East Side Aquifer Subbasin in January 2022. Generally, the GSP outlines how groundwater sustainability will be achieved in 20 years and then maintained for an additional 30 years. The SVBGSA has yet to develop specific projects to increase water supply or decrease water usage within the East Side Aquifer Subbasin. The GSP for the Subbasin assumes that urban and agricultural use will continue at their current levels through 2070. The GSP also states that converting from irrigated agricultural to urban use would not be considered increased use (Source: 26)

As noted above, the Proposed Project would reduce the water use within the Project site and thus reduce the demand placed on the East Side Aquifer Subbasin. Consequently, the Proposed Project is considered consistent with the GSP goal of long-term sustainability within the subbasin. As a result, the Proposed Project would have a less-than-significant impact to groundwater supplies and would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Proposed Project may impede sustainable groundwater management of the basin.

Hydrology and Water Quality (c) - Less than Significant Impact:
Based on Monterey County GIS, the Project site is identified has having a low erosion hazard and no streams or rivers. However, the Proposed Project would alter the Project site's current drainage pattern and potentially result in erosion by introducing new impervious surfaces that could increase stormwater runoff. During construction, the Proposed Project would adhere to the best management practices identified in the PSWCP (Source: 16) to minimize or avoid the amount of runoff and sedimentation. Best management practices would include, but are not limited to, installation of silt fencing and inlet protection and stabilization of all disturbed soils and the construction entrance/exit. The Proposed Project drainage improvements would include a new on-site storm drain system and three biorientation ponds. These drainage system improvements would be collectively sized to provide on-site retention and management of runoff rates, per the Post-Construction Requirements (PCRs) and County requirements. The bioretention ponds would be sized at a minimum 4% area ratio to meet PCR 2. A retention volume would be provided during final project design in a drain rock reservoir, below the perforated pipe (subdrain) that is installed at the top of the rock layer, to meet PCR 3. The overall

SCM volume (drain rock + BSM + surface ponding) is used to meet Monterey County's flood control requirements. In addition, approximately 7,600 square feet of permeable pavers would be installed to collect runoff from impervious surfaces. This runoff would be infiltrated and would not produce runoff to the storm drain system, or a surface receiving waterbody, or create nuisance ponding that may affect vegetation health or contribute to vector problems. Stormwater runoff would be collected via a series of gutters, drain inlets, and storm drain piping discharging to storm water detention and retention basins, and then to the existing City of Salinas stormwater pipeline located within Sconberg Parkway.

Of the Proposed Project's six drainage management areas, four areas that encompass 101,100 square feet would drain into the proposed drainage system improvements (on-site retention, filtration, and discharge to the Sconberg Parkway stormwater pipeline). The remaining two drainage management areas (totaling 11,000 square feet) would not be retained on-site and would drain directly to Sconberg Parkway and conveyed into the City of Salinas's existing storm drain system. The PSWCP determined that it would be infeasible for these areas to be conveyed into an on-site drainage improvement due to the need to match grades at Sconberg Parkway. Adherence to the PSWCP and County regulations relating to erosion control would ensure that the Proposed Project would not result in substantial runoff in excess of existing or planned stormwater systems.

The property is located within Flood Zone X (unshaded) of the Federal Emergency Management Agency (FEMA) Flood Maps. FEMA defines Zone X (unshaded) as areas determined to be outside the 0.2% chance of annual flooding (500-year flood). As a result, the Proposed Project would not be expected to face severe flooding events during its operational life. Monterey County Code (Title 16 – Environment) does not establish any restrictions or regulations for development within Zone X. Adherence and implementation of the above-mentioned stormwater control measures would result in the Proposed Project having a less than significant impact with respect to impeding or redirecting flood flows or substantially increasing the amount of surface water runoff.

Hydrology and Water Quality (d) - Less than Significant Impact:
The Proposed Project is not located within an area subject to tsunami, or seiche zones, therefore, there is no impact related to the risk release of pollutants due to project inundation due to these areas. The Proposed Project's drainage system would be constructed to meet current regulations and flood control requirements and implementation of BMPs. As a result, the potential for risk of release of pollutants due to flood hazard is low. This represents a less than significant impact.

Hydrology and Water Quality (e) - Less than Significant Impact:
As described above in Section IV.10(a), the Proposed Project would not result in significant water quality or groundwater quality impacts that would conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Per the PSWCP, stormwater would be retained on-site, and all drainage systems would be designed to accommodate the 95th percentile of specified storm events. This represents a less than significant impact.

11. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☒	☐
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? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation

The Project site is zoned and designated Farmland, 40 acres in the 2019 General Plan and Greater Salinas Area Plan. The subject zoning allows for various agricultural and agricultural support uses, including agricultural employee housing. The surrounding area includes residential uses to the north and agricultural uses to the east, west, and south. The subject property is currently being used primarily for agricultural cultivation. The eastern portion of the property, abutting Alisal Road, are used for agricultural support facilities.

Pursuant to Monterey County Code section 21.30.050, the Proposed Project would be allowed subject to approval of a Use permit. The Proposed Project would be required to comply to a Trip Reduction Checklist for a reduction in vehicle miles traveled with the inclusion of alternative forms of transportation. These plans are included in the County application for the Proposed Project (Source: 1).

Land Use and Planning (a) and (b) – Less Than Significant Impact:

The division or disruption of an established community would occur if a project created a physical barrier separating, isolating, or dividing a portion of a built community. The physical division of a community is traditionally associated with the construction of large-scale transportation improvements (e.g., highways) or the creation of a large university campus. The Project site is currently being utilized for agricultural cultivation and the Proposed Project would result in the construction of an agricultural residential facility, providing 361 beds (360 farmworkers and one manager). Therefore, the Proposed Project would not physically divide an established community.

The Proposed Project includes the construction of three (3) two-story apartment-style buildings on a 5.24-acre portion of a 188-acre parcel that is primarily used for agricultural cultivation. General Plan Policy AG-1.7, "promotes the clustering of residential uses accessory to the agricultural use of the land in locations that will have minimal impact on the most productive land." The Proposed Project would be clustered near the existing agricultural housing and support facilities.

2010 General Plan Policy LU-1 serves to promote appropriate and orderly growth and development while protecting desirable existing land uses. General Plan Policy LU-1.4 restricts development to areas with adequate services to serve such development, while Policy LU-1.5

guides new development to be compatible with adjacent land uses. The Proposed Project would be consistent with the goals and policies of the General Plan and the land use designation set forth in the supplemental Greater Salinas Area Plan. The Planning Commission is the appropriate authority to consider the required Use Permit.

12. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source: 1, 2, 3, 4, 5, 6, 32, 33)	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (Source: 1, 2, 3, 4, 5, 6, 32, 33)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on mineral resources.

13. NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source: 1, 2, 3, 4, 5, 6, 20)	☐	☐	☒	☐
b) Generation of excessive ground borne vibration or groundborne noise levels? (Source: 1, 2, 3, 4, 5, 6, 20)	☐	☐	☒	☐
c) 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 noise levels? (Source: 1, 2, 3, 4, 5, 6, 20)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
Noise is commonly defined as unwanted sound. Sound levels are usually measured and expressed in decibels ("dB") with zero (0) decibels corresponding roughly to the threshold of hearing. Most sounds consist of a broad band of frequencies, with each frequency differing in

sound level. The intensities of each frequency add together to generate a sound. Most environmental noise includes a conglomeration of noise from distant sources, which creates a relatively steady background noise in which no source is identifiable.

An Acoustical Analysis (Monterey County Library No. LIB230208) (Source: 17) was prepared for the Proposed Project and concluded that the Project site may be exposed to CNELs between 56 and 64 decibels. The primary source of noise in the Project vicinity would be from vehicle traffic along Alisal Road and Sconberg Parkway, neighboring residences, the adjacent elementary school, and surrounding agricultural operations.

The State of California and the County of Monterey have established plans and policies that are designed to limit noise exposure at noise-sensitive land uses. Plans and policies applicable to the proposed project include:

1. The State California Environmental Quality Act (CEQA) Guidelines;
2. Title 24, Part 2 of the State Building Code;
3. Monterey County General Plan Safety Element; and
4. Caltrans Construction Vibration Criteria.

Noise (a) - Less than Significant Impact:

The Proposed Project would increase ambient noise levels in the vicinity of the Project site during construction and operation. However, noise levels generated during the operation of the Proposed Project would be minimal and typical of residential uses. As described below, the Proposed Project would not result in a significant temporary or permanent increase in ambient noise levels in the project vicinity in excess of the 2010 Monterey County General Plan and other applicable standards.

The 2022 California Building Code (CBC) requires, in addition to other requirements, that interior noise levels attributable to exterior environmental noise sources be limited to a level not exceeding 45 dBA in any habitable room. The Monterey County General Plan Safety Element combines the State mandated safety and noise elements. The Safety Element identifies sources of noise and provides policies addressing existing and foreseeable noise problems. All proposed discretionary residential projects that are within roadway or railroad noise contours of 60 CNEL or greater must include a finding of consistency with the provisions of the Noise Hazards section of the Safety Element. If found that roadway noise exceeds the 60 CNEL within a Project site, a Project-specific noise analysis shall be required. If impacts are identified, the Project applicant is required to conduct mitigation analysis using published Caltrans/Federal Highway Administration guidelines and implement mitigation measures as required. Accordingly, an Acoustical Analysis (Monterey County Library No. LIB230208, Source: 17) was prepared and is based on the result of 24-hour sound level measurements at two locations. Predictive modeling based on the sound level measurements indicated that the Proposed Project would be exposed to CNEL between 56 and 64 dBA.

Construction Activities

Construction of the Proposed Project would generate temporary noise in the project vicinity due to the use of equipment (e.g., trucks, tractors, excavators). **Table 13-1** identifies typical noise

emissions (i.e., levels) generated by construction equipment and how equipment noise reduces with distance.

Table 13-1 Construction Equipment Noise Emission Levels

Equipment	Typical Noise Level (dBA) 50 ft from Source	Typical Noise Level (dBA) 100 ft from Source	Typical Noise Level (dBA) 200 ft from Source	Typical Noise Level (dBA) 400 ft from Source
Air Compressor	81	75	69	63
Backhoe	80	74	68	62
Ballast Equalizer	82	76	70	64
Ballast Tamper	83	77	71	65
Compactor	82	76	70	64
Concrete Mixer	85	79	73	67
Concrete Pump	82	76	70	64
Concrete Vibrator	76	70	64	58
Dozer	85	79	73	67
Generator	81	75	69	63
Grader	85	79	73	67
Impact Wrench	85	79	73	67
Jack Hammer	88	82	76	70
Loader	85	79	73	67
Paver	89	83	77	71
Pneumatic Tool	85	79	73	67
Pump	76	70	64	58
Roller	74	68	62	56

Source: 28, U.S. Department of Transportation, *Transit Noise and Vibration Impact Assessment,* 2006 Construction-generated noise levels drop off at a rate of about 6 dBA per doubling of distance between the source and receptor.

The highest maximum instantaneous noise levels generated by the Proposed Project's construction could typically range from about 90 to 95 dBA Lmax at a distance of 50 feet from the noise source. However, typical hourly average construction-generated noise levels range from about 75 dBA to 89 dBA Leq, measured at a distance of 50 feet from the center of the site during busy construction periods, e.g., earth moving equipment, impact tools, etc. As noted, the nearest sensitive receptor is located approximately 200 feet from the Project site. Based on the proximity of the nearest receptor and the rate which noise diminishes, construction-related activities would generate noise levels between 62 and 77 dBA and would not exceed the County's Noise Ordinance threshold. Therefore, no mitigation is required to address construction-related noise generation resulting in a less than significant impact.

Construction activities would be required to comply with the Monterey County Noise Ordinance as described in Chapter 10.60 of the Monterey County Code. The Ordinance applies to "any

machine, mechanism, device, or contrivance" within 2,500 feet of any occupied dwelling unit and limits the noise generated to 85 dBA at a distance of 50 feet from the noise source. Noise-generating construction activities are limited to the hours between 7AM. and 7PM. Monday through Saturday. No construction noise is allowed on Sundays or holidays. This represents a less than significant impact.

Operational Activities
The subject property is currently used for agricultural cultivation and agriculture support facilities, including residential uses. The Proposed Project consists of the construction of three farmworker housing apartments containing 46 units. Residents would be transported to agricultural fields by bus or van. Bus and van trips would occur in the early morning hours (between 2:00AM and 5:00AM) and in the afternoon (between 12:00PM and 4:00 PM). Departures and arrivals would occur in phases, minimizing onsite noise impacts. Exterior operational sound levels are not expected to exceed 55 dBA. The minor increase in traffic from proposed bus and shuttle services would not result in a significant increase in traffic-related noise in the area. The anticipated increase in ambient noise associated with the Proposed Project would be consistent with noise generated by surrounding residences and therefore would be considered less than significant. Operation of the Proposed Project would be subject to the restrictions of the County's Noise Ordinance, which prohibits loud and unreasonable noise between 10PM and 7AM the next morning. This represents a less than significant impact.

Noise (b) Less than Significant Impact:
In the opinion of the technical acoustic consultants at 45dB Acoustics (Source: 17), significant ground-borne vibration is not expected to be a significant impact. Minimal ground drilling would be required and the impact of moving trucks on ground vibration would be minimal. Therefore, impacts would be less than significant.

Noise (c) - Less than Significant Impact:
See Section VI.9(e) (Hazards and Hazardous Materials) for a detailed discussion on compliance with the 1982 Salinas Municipal Airport Land Use Plan. In summary, application of standard Airport Land Use Commission conditions of approval would ensure that the people residing in the Proposed Project would not be exposed to excessive noise levels. As detailed above in section VI.13 (a), adherence to the County's Noise Ordinance would ensure that the Proposed Project would not expose people working in the project area to excessive noise levels. This represents a less than significant impact.

14. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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)? (Source: 1, 2, 3, 4, 5, 6, 21, 34)	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (Source: 1, 2, 3, 4, 5, 6, 21, 34)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
The Proposed Project consists of the conversion of an approximately 5.24-acre portion of a 188-acre parcel to agricultural employee housing. The Proposed Project would include the construction of 45 agricultural employee housing units. There would also be one onsite manager unit, for a total of 361 residents.

The County of Monterey has an estimated population of 446,229 persons. The Project site is also located adjacent to the City of Salinas, which has a current population of 161,585. The Proposed Project's agricultural workers would be residents seasonally, approximately eight months out of the year (between April and November), while the manager would reside onsite yearly. In 2020, AMBAG published a new regional growth forecast that projects a 2025 population of 452,761 residents and a 2035 population of 476,028 residents for Monterey County. Therefore, the projected cumulative growth in Monterey County plus the Proposed Project would result in a total population of approximately 453,122 persons for 2025.

Population and Housing (a) - Less than Significant Impact:
The population increases discussed above are incremental and insignificant at the County level. The Proposed Project would directly increase the population of the Greater Salinas area. The subject property's zoning district, Farmland, allows agricultural employee housing of 37 or more beds in group quarters or 13 or more units, subject to a Use Permit. No density restrictions are applied to agricultural employee housing. The controlling factors for density are therefore the availability of necessary facilities to service the development. As discussed in Sections VI.15 Public Services, VI.16 Recreation, VI.17 Transportation, and VI.19 Utilities & Service Systems, necessary public facilities and infrastructure are available which would serve the project.

Additionally, the Proposed Project does not include the construction of any businesses or establishment of other land uses that would directly induce population growth, nor would it include the provisioning of additional infrastructure beyond what's needed to service the development that could indirectly induce population growth. The population growth associated with the Proposed Project is contemplated in the AMBAG growth models and impacts for population growth are less than significant.

Population and Housing (b) - No impact:
The site is currently used for row-crop production and contains 16 agricultural apartment units and 6 farmworker dwellings. The Proposed Project does not involve the demolition of these residential structures. Therefore, no people would be displaced and there would be no need to construct replacement housing elsewhere.

15. PUBLIC SERVICES

Would the project result in:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source: 1, 2, 3, 4, 5, 6, 25)	☐	☐	☒	☐
b)	Police protection? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☒	☐
c)	Schools? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☒	☐
d)	Parks? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☒	☐
e)	Other public facilities? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Fire Protection
The Monterey County Regional Fire Protection District currently serves the proposed project site. The Monterey County Regional Fire District's closest station is the Toro Station located at 19900 Portola Drive, approximately six miles southwest of the Project site. Though outside City of Salinas boundaries, fire response to the project site in the event of an emergency would also be provided via City of Salinas Fire Department. The closest City of Salinas Fire Station is Station #4 located at 45 East Bolivar Street, approximately 0.75 miles west of the Project site.

Police Protection
Police protection services are provided to the proposed project site by the Monterey County Sherriff Department and the closest Sherriff's station is located approximately 2.67 miles from the Project site.

Schools
The proposed project is located within the Alisal Unified School District. The closest school to the Proposed Project is the Bardin Elementary School, approximately 500 feet northwest of the Project site.

Parks
Monte Bella Community Park, located 0.6 miles north of the Project site, is the closest park facility. In addition, the Proposed Project would include a recreation room, open space areas, and an informal recreation area within the Project site.

Public Services (a) and (b) - Less than Significant Impact:
The Project site is served by the Monterey County Sheriff's Department and the Monterey County Regional Fire Project District (Toro Station). The Proposed Project would house a total of up to 361 agricultural employees without dependents. Each of the 45 units can house up to eight individuals and would be occupied during the Salinas Valley harvest season which is from April through November. In addition, one residential manager unit is proposed, which would be occupied year-round. While the Proposed Project would result in an increase in demand in fire and protection services, due to the increase of people proposed to be housed at the site, the change is considered to be minor and not at a significant level overall as residential uses already exist on site. Adequate access and entry at the Project site with three points of ingress and egress for emergency vehicles. As proposed, each building would include a fire sprinkler system as well as onsite fire hydrants as required by Monterey County Fire Code. The Proposed Project would not significantly impact fire or police protection services nor require the construction of new or remodeled facilities. The impact would be less than significant.

Public Services (c), (d), and (e) - Less than Significant Impact:
The Proposed Project would not create the need for new or expanded schools or other public facilities. The Proposed Project would seasonally house 360 farmworker employees and one manager. There would be no increase to the number of school-aged children at the Project site as the Proposed Project would not allow children or dependents to reside onsite. Adequate public utility services are available to serve the Proposed Project. The Proposed Project includes dedicated open space and recreational areas which would provide onsite recreational opportunities that are immediately available to occupants. Therefore, the Proposed Project would not create additional demands on school services, impacts to public services would be insignificant, and there would be no impact on other public services such as parks.

16. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☒	☐
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? (Source: 1, 2, 3, 4, 5, 6)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
The recreational facilities proposed as part of the Proposed Project would be solely dedicated to the residents of the subject property, thereby reducing the usage and limiting the physical deterioration or acceleration of deterioration of the community facilities and parks.

Recreational facilities are proposed within the Project site, inclusive of a recreation room, open space, recreational fields, and a paved walkway which would allow residents to partake in sports, physical activity, and leisure without drawing from the previously existing recreational facilities and parks located throughout the immediate region.

In addition, to the proposed on-site facilities, the Project would offer bus service to various neighboring recreational facilities. The Monte Bella Community Park would be within walking distance of the Project site and offers basketball courts, walking areas, picnic areas, a children's playground, and other recreational amenities. Given the working hours of the occupants, it is not likely that the proposed temporary residential project would result in a substantial increase in the use of this park or other recreational facilities. Therefore, the Proposed Project would have a less than significant impact on neighborhood and regional recreational facilities and therefore would not require the construction or expansion of additional recreational facilities.

17. TRANSPORTATION/TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (Source: 1, 2, 3, 4, 5, 6, 22)	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (Source: 1, 2, 3, 4, 5, 6, 22)	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Source: 1, 2, 3, 4, 5, 6, 22)	☐	☐	☒	☐
d) Result in inadequate emergency access? (Source: 1, 2, 3, 4, 5, 6, 22)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
The following discussion is based on a Transportation Impact Analysis (Traffic Reoprt) prepared for the project by Keith Higgins Traffic Engineer, July 19, 2023 (Monterey County Library No. LIB230210; Source: 19). The traffic study analyzes the impacts associated with the development

of the Proposed Project. As discussed in Section II.A – Description of Project and Environmental Setting, of this Initial Study, access to the site would be provided via a gated driveway off Sconberg Parkway and Alisal Road. An emergency access driveway is also proposed on Sconberg Parkway on the eastern corner of the Proposed Project.

Existing Traffic Network
The Project site is located on the south side of Sconberg Parkway and east of Alisal Road in unincorporated Monterey County, behind the Bardin Apartments. The key roadways in the vicinity of the Proposed Project include US 101, Sconberg Parkway, Alisal Road, and Old Stage Road.

The purpose of the Proposed Project is to provide temporary housing for agricultural workers who typically do not have personal vehicles. As such, the operational component of the Proposed Project includes providing transportation to work and services via buses and vanpools. During work days, outbound bus/vanpool trips would generally occur between 2:00 A.M. – 5:00 A.M., and inbound bus/vanpool trips would generally occur between 12:00 P.M. – 4:00 P.M. The buses would be stored offsite and driven to and from the site each day, while the vans would be stored onsite. During weekday evenings and weekends, a bus service would be provided to transport employees to shopping, recreation, and religious services. The majority of bus trips would be in the early morning and early afternoon, before peak hour traffic times. Therefore, the Proposed Project would not generate a significant amount of traffic.

While it is possible that these 45 units could be converted to traditional apartments in the future with no restrictions on vehicle ownership, the Proposed Project would only be utilized for H2A. If traditional apartments are proposed in the future, separate discretionary review and approval would be required as such apartments would generate more traffic than the Proposed Project.

The Traffic Report included a qualitative Vehicle Miles Traveled (VMT) evaluation, which determined the proposed project would not generate significant levels of VMT due to proximity to existing transit services, as well as the proposed bus and vanpool service for the development.

The Traffic Report analyzed 11 intersections and determined each intersection's respective current level of service (LOS) for AP and PM peak hours, except Intersection 4 which does not currently exist:

1. Intersection 1(LOS A/B) – Bardin Road - Alisal Road – E. Alisal Street (City of Salinas)
2. Intersection 2 (LOS A/B) – Alisal Road / Sconberg Parkway (City of Salinas)
3. Intersection 3 (LOS B/B)– Bardin Elementary School Bus – School Driveway/Sconberg Parkway (City of Salinas)
4. Intersection 4 (LOS N/A)– Project Driveway / Sconberg Parkway (City of Salinas)
5. Intersection 5 (LOS B/B)– Monte Bella Boulevard / Sconberg Parkway (City of Salinas)
6. Intersection 6 (LOS B/B) – Alisal Road / Bardin Apartments (Monterey County)
7. Intersection 7 (LOS C/B)– Old Stage Road / Williams Road (Monterey County)
8. Intersection 8 (LOS F/F)- US 101 / Hartnell Road (Caltrans)
9. Intersection 9 (LOS B/C)– Alisal Road / Hartnell Road (Monterey County)

10. Intersection 10 (LOS A/B)– Alisal Road / Old Stage Road (Monterey County)
11. Intersection 11 (LOS A/C)– Old State Road / Spence Road (Monterey County)

Transportation (a), (b), and (c) - Less Than Significant Impact:
As discussed above, the agricultural employees would live on-site exclusively during the harvest season, which runs from April through November. The Proposed Project, analyzed as agricultural housing, is estimated to generate a negligible amount of daily trips, as the majority of residents would not have access to personal automobiles. Residents would be transported to and from a variety of agricultural fields throughout the Salinas Valley by buses and vans. In addition, residents would be provided with shuttle service or would otherwise walk or use bicycles to travel to local businesses. The use of bus and van service with vehicle occupancy ranging from 9 to 30 riders, would significantly reduce VMT compared to workers driving themselves to the fields from existing regional housing. Further, the bus and van services provided is a viable transportation alternative consistent with the Public Transit Services Goals C-6 in the 2010 Monterey County General Plan.

Although the Proposed Project would qualify as H2A housing, it is possible that these housing units could be converted in the future to traditional apartments with no restrictions on vehicle ownership. Such conversion would generate more traffic than a H2A project. However, because standard apartments are not proposed, impacts in this Section of the Initial Study are analyzed based on the Proposed Project scope of work: H2A housing. **Table T-1** shows the trip generation estimate for the potential future use of the proposed development as multi-family (traditional) housing. Traditional apartments would generate approximately 310 daily trips, with 19 trips occurring during the AM peak hour and 24 trips occurring during the PM peak hour. The 310 daily trips would be greater than the default threshold of 110 daily trips set by the Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018).

Table T-1. Trip Generation for Multi-Family Housing (Source: 19)

Proposed Use	# of Units	Daily Trips	AM PEAK HOUR				PM PEAK HOUR			
			Peak Hour Trips	% of ADT	Trips In	Trips Out	Peak Hour Trips	% of ADT	Trips In	Trips Out
Apartments	45	303	18	6%	4	14	23	8%	14	9
Manager Unit	1	7	1	14%	0	1	1	14%	1	0
Total:		310	19		4	15	24		15	9

Notes:
1. Trip generation rates published by Institute of Transportation Engineers (ITE). Trip Generation Manual 10th Edition, 2017.

To estimate the Proposed Project's trip generation as agricultural employee housing, the project's Traffic Engineer derived driveway traffic counts from two existing agricultural employee housing facilities in Monterey County (see **Table T-2** below) The Casa Boronda agricultural housing project includes 75 employee units and one manager's unit. To provide additional data to determine daily trip generation totals and hourly variations, the project's Traffic Engineer conducted a second 24-hour traffic count at the 525 Third Street Apartments Agricultural Worker Housing project (Greenfield Project) in Greenfield, California on Wednesday, June 22, 2022.

Table T-2. Trip Generation for H2A Agricultural Worker Housing (Casa Boronda) (Source: 19)

Proposed Use	Project Size	Daily Trips	AM PEAK HOUR				PM PEAK HOUR			
			Peak Hour Trips	% of ADT	Trips In	Trips Out	Peak Hour Trips	% of ADT	Trips In	Trips Out
Agricultural Housing	600 beds	113	4	4%	3	1	28	25%	14	14
Manager Unit	1 Unit	7	1	14%	0	1	1	14%	1	0
Total:		120	5		3	2	20		15	14

The Proposed Project would be utilized as agriculture employee housing (H2A). As detailed in Table T-2, the Casa Boronda H2A project with 75 units generates approximately 120-day trips, with five being in the morning peak and 20 being in the evening peak. Whereas 175 one-way trips were counted during the 24-hour traffic count at the Greenfield Project. H2A projects are only occupied during the growing season in the Pajaro and Salinas Valleys which extends from March through the middle of November, about 8 ½ months, leaving the site unoccupied for the winter season, which lasts about 3 1/2 months. The Greenfield Project trip generates 123 trips on an annualized basis.

The Proposed Project would represent a 40% reduction in project-related trip generation when compared to the Casa Boronda apartment complex due to the number of proposed units (45 vs. 75). This equates to approximately 75 daily trips with six trips in the morning peak hour and 25 in the evening peak hour. On an annualized basis, the Proposed Project would generate 55 trips with 4 in the morning peak hour (3-4AM) and 6 in the evening peak hour (2-3PM). These peak trips are outside of the street peak hours of 6:30-10AM and 4-5PM.

CEQA Guidelines Sec. 15064.3(b)(1) identifies that VMT exceeding an applicable threshold of significance may indicate that a project has a significant transportation-related effect. Currently, the County of Monterey and City of Salinas do not have adopted VMT thresholds. In the absence of an adopted threshold of significance, CEQA Guidelines Sec. 15064.3(b)(3) identifies that a lead agency may qualitatively evaluate potential traffic-related effects by considering such factors as availability of transit, proximity to other destinations, and similar factors, is provided for the proposed project. Therefore, this Section of the Initial Study is based on the default threshold of 110 daily trips set by the Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018). The Proposed Project would generate daily trips that are below the 110 threshold established by the Office of Planning and Research.

Comparing the data contained in the tables above, H2A agricultural housing would represent approximately 1/4 to 1/3 of the daily total, depending on whether it is considered on a peak occupancy or annual average basis. The AM peak hour would be 10% to 14% of the apartment trip generation. Since the employees living at the Project site would have transportation available via buses and vanpools, the project would not generate a significant amount of traffic. The Higgins report concludes that all intersections would operate at LOS C or better during peak hours with implementation of the proposed project, except for one intersection that is already operating as a failing LOS (LOS F; US 101 / Hartnell Road) (Source: 19).

The Monterey County VMT Calculator bases a Project's VMT estimate on its location, which is identified by the Traffic Analysis Zone (TAZ). As indicated in the Traffic Impact Analysis (Source: 19), the VMT calculator estimates that traditional apartments at the Project site would have an Average VMT per capita of 8.6. The Threshold of Significance for this TAZ is 9.7. As H2A housing, the Proposed Project would generate less VMTs than a typical apartment building due to its reliance on vans and buses and is thus expected to generate VMT per capita below 8.6 and consequently below the threshold of 9.7. Therefore, the Proposed Project would have a less-than-significant VMT impact. No mitigations such as trip reduction strategies are required. Additionally, future conversion of the Proposed Project to traditional residential units would also have a less than significant impact on VMT.

The Proposed Project would not substantially increase hazards due to a design feature (for example, sharp curves or dangerous intersections) or incompatible uses. The Proposed Project was reviewed by HCD-Engineering Services who determined that adequate access to the site via Alisal Road and Sconberg Parkway would be provided. No additional roads or design features are required, resulting in a less-than-significant impact.

Existing Pedestrian Network
Sconberg Parkway currently has sidewalks only along the north side of the roadway, connecting into adjacent neighborhoods. The Alisal Street roundabouts have sidewalks around both sides. Alisal Road has a sidewalk between Sconberg Parkway and Alan Avenue. Alisal Street, Bardin Road, and Williams Road have sidewalks on both sides of the street in the City of Salinas. Bardin Road contains two crosswalks for pedestrian crossings to and from Bardin Elementary School.

The Proposed Project would result in an imperceptible change in traffic operations throughout the study street and road network. No changes traffic improvements would be required to accommodate the anticipated daily trip generation and therefore Proposed Project represents a less than significant impact. However, as described below, the Proposed Project would be required to pay fair share traffic impact fees to the County of Monterey, TAMC, and City of Salinas.

Existing Bicycle Network
Dedicated bicycle facilities are provided in the immediate surrounding area of the proposed project including the following:

1. Class I bike path along the west side of Alisal Road from Margaret Street to south of Sconberg Parkway.
2. Class II bike lanes along the west side of Alisal Road between Sconberg Parkway and the existing Bardin Apartments driveway. Class II bike lanes are also provided along both sides of Monte Bella Boulevard and Alisal Street.
3. Class II bike routes are designated but not yet constructed along Old State Road and Alisal Road south and east of the City of Salinas.
4. Class IV buffered bike lanes along both sides of Bardin Road between Alisal Street and Williams Road and along the east side of Alisal Road between Sconberg Parkway and Alan Avenue.

5. Bicycles can use the sidewalks surrounding the roundabouts, but they do not connect to bicycle lanes on any of the surrounding streets.

The Project would provide shuttle service to and from employment sites as well as shopping, medical facilities, parks, and religious institutions, which would minimize Project off-site bicycle trips. Therefore, the Project would represent a less than significant adverse effect to bicycle circulation.

Existing Transit Service
Monterey-Salinas Transit (MST) provides fixed-route bus service in Monterey County and Peninsula cities. MST Line 41/42 provides the closest public transit service to the site. Line 41 (Northridge – Salinas) provides weekday and weekend service every 15 to 30 minutes between roughly 5:00 AM and 10:00 PM. Line 42 (Alisal – Salinas) provides weekday and weekend service every 15 to 30 minutes between roughly 5:00 AM and 10:00 PM. The nearest bus stop to the project site is located on Williams Road just east of Bardin Road. This bus stop is serviced by both eastbound and westbound buses. This bus stop is about ¾ mile from the project site. Bus stops in proximity to the subject property for both lines are located on Porter Drive, south of San Juan Road approximately 0.4 mile (about a 10- to 15-minute walk) from the Project site. Additional bus stops are located on Salinas Road further south of the subject property.

The Proposed Project would provide shuttle service to and from employment sites as well as shopping, medical facilities, parks and religious institutions, which would minimize the Proposed Project's off-site pedestrian trips. The Proposed Project is therefore anticipated to generate minimal transit demand and would represent a less than significant adverse demand for the transit service.

<u>Funding for Transportation Improvements</u>
Transportation improvements in the study area are funded through Transportation Agency for Monterey County (TAMC) fees, Monterey County Traffic Impact fees and additional funding provided by Measure X, the Transportation Sales Tax measure. These local funding sources are anticipated to leverage State and federal funding sources to fully fund the improvements. Future toll roads are also being considered as a funding source.

TAMC Fee
TAMC and its member jurisdictions have adopted a county-wide, regional impact fee to cover the costs for studies and construction of transportation improvements throughout Monterey County. This impact fee is applied to all new development within Monterey County and is governed by the Regional Impact Fee Nexus Study Update (March 26, 2008), prepared by Kimley-Horn Associates, Inc and as updated in 2018 by Wood Rodgers.

TAMC, Monterey County and Caltrans have agreed that payment of the TAMC fee satisfies the proposed project's fair share contribution to cumulative impact mitigation throughout the regional highway system. This includes highways that will operate deficiently but no capital improvement project is programmed to correct the deficiency. Projects partially funded by the TAMC fee in North Monterey County and the vicinity of Salinas include the following:

1. TAMC Improvement 2 – SR 156 Widening from US 101 to Castroville Boulevard
2. TAMC Improvement 4 – Davis Road North from Blanco Road to Market Street (SR183)
3. TAMC Improvement 5 – Davis Road South from Blanco Road to Reservation Road, including replacement of bridge over Salinas River
4. TAMC Improvement 7 – US 101-South County Phase 1 (Frontage Roads – Salinas to Chualar)
5. TAMC Improvement 8 – US 101 South County Phase 2 (Harris Road Interchange)
6. TAMC Improvement 10 – US 101 Widening from Airport Boulevard to Boronda Road

Monterey County Traffic Impact Fee
Monterey County also has a traffic impact fee which is described the "Monterey Countywide Traffic Impact Fee Nexus Study," Kimley Horn, August 1, 2014. The only project in the vicinity of the Project site is Project Number 4 – Harris Road Widening. This project includes widening Harris Road to four lanes with Class II bike lanes from Harris Court near Spreckels to the Salinas City Limit near Abbott Street.

City of Salinas Traffic Impacts Fee
The City of Salinas Traffic Improvement Program – 2010 Update, Wood Rodgers, March 2010, is the technical document used to establish the Salinas Traffic Fee Ordinance (TFO), which is the primary funding source for transportation improvements to offset adverse effects of cumulative development as the City builds out its current General Plan. A traffic impact fee is assessed to new development within the City of Salinas to offset its cumulative adverse effects on the circulation system that is under the City's jurisdiction.

Project Traffic Impact Fees.
The Proposed Project would be subject to the TAMC Regional Development Impact Fee, the City of Salinas Traffic Fee Ordinance, and the Monterey County traffic impact fee. Monterey County and the City of Salinas would determine the fee amounts prior to issuance of construction permits.

Transportation (d) - Less Than Significant Impact:
The Proposed Project driveways, as well as the internal site circulation, would be designed in accordance with all applicable standards allowing safe and efficient ingress and egress of emergency vehicles. HCD-Engineering Services and Monterey County Regional Fire Protection District have revised the Proposed Project and raised no concerns relative to emergency access. Compliance with applicable building and fire code standards would be required prior to issuance of any construction permit. In addition, the Proposed Project's contribution to traffic impact fees collected by TAMC, City of Salinas, and County of Monterey, would offset regional impacts related to emergency access. The impacts to emergency access would, therefore, be less-than-significant.

18. TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 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 California 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 (Source: 1, 2, 3, 4, 5, 6, 12)	☐	☐	☐	☒
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 Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (Source: 1, 2, 3, 4, 5, 6, 12)	☐	☒	☐	☐

Discussion/Conclusion/Mitigation:
The information contained in this discussion is supplemented with additional information provided by Native American representatives as part of the Tribal consultation process undertaken by the County of Monterey in accordance with AB52.

Tribal Resources (ai) and (a.ii.) - Less than Significant Impact with Mitigation:
Public Resources Code Sec. 21074 defines a tribal cultural resource as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following: a) included or determined to be eligible for inclusion in the California Register of Historical Resources, [or] b) included in a local register of historical resources as defined in subdivision (k) of [Public Resources Code] Section 5020.1" (Public Resources Code Sec. 21027(a)). No Tribal cultural resources, as defined in Public Resources Code Section 21074, are listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources, are known to exist at the Project site. Further, the Proposed Project does not include demolition of any existing structure. No known or previously recorded archeological sites are located in or immediately adjacent to the Project site. Additionally, the field reconnaissance conducted in May 2023 (Source: 12) did not find surface evidence of potentially significant historic period archaeological resources. Furthermore, the Proposed Project would be located within a portion of the subject property that has been extensively disturbed in connection with the current agricultural operation. While no

known Tribal cultural resources exist at the Project site, construction-related activities could potentially affect a buried Tribal cultural resource or previously unknown Tribal cultural resource. This represents a potentially significant impact that would be reduced to a less than significant level through the incorporation of the following mitigation.

Pursuant to Public Resources Code Section 21080.3.1, Monterey County HCD-Planning initiated consultation with local Native American tribes on October 9, 2023. The Esselen Tribe of Monterey County (ETMC) and Ohlone Costanoan Esselen Nation (OCEN) requested tribal consultation.

During consultation (October 31, 2023 and November 6, 2023), representatives of both tribes requested the on-site presence of a Native American monitor to observe all excavation activities associated with the development of the site, specifically for the installation of utilities and initial ground disturbance activities up to 3 feet deep. In addition, the OCEN representative requested that OCEN be included in any resource recovery program or reburial, and that the applicant send the archaeological report to OCEN.

After the consultation with County staff, OCEN and ETMC submitted letters to memorialize the requests made during the consultation. OCEN made additional requests including the following: 1) OCEN's Tribal leadership be provided with archaeological reports/surveys, including subsurface testing, and presence/absence testing; 2) all cultural items found be placed with OCEN and be reburied; and 3) an OCEN monitor, approved by the OCEN Tribal Council, be used for each soil disturbing machine, including hand tools.

As described in Section VI.5 of this Initial Study, a standard County Condition of Approval for the protection of cultural resources, PD003(B), would be applied to address the potential inadvertent discovery of cultural resources. Additionally, mitigation measures are required to reduce potential impacts to unknown tribal cultural resources to a less than significant level. **Mitigation Measure 2** (described in Section VI.5) would require that a qualified archaeological monitor be retained on an "on-call" basis during ground-disturbing activities. **Mitigation Measure 3** (described below) would require that, if tribal cultural artifacts or human remains are discovered, these resources are treated with appropriate dignity and respect. With implementation of the County's condition of approval for cultural resources (PD003B) and **Mitigation Measures 2 and 3**, the potential impact to Tribal Cultural Resources would be less than significant.

Mitigation Measure No. 3 – On-Site Tribal Monitor:
To ensure that Tribal Cultural Resources incur a less than significant impact if encountered, a Tribal Monitor approved by the appropriate tribe traditionally and culturally affiliated with the vicinity of the subject parcel and that has consulted with the County and designated one lead contact person in accordance with AB 52 requirements, or other appropriately NAHC-recognized representatives, shall be on-site and observe all project-related grading and excavation to identify findings with tribal cultural significance. This Tribal Monitor shall have the authority to temporarily halt work in order to examine any potentially significant cultural materials or features. If resources are discovered, the Applicant/Owner/contractor shall refer to and comply with Condition PD003(B) as applicable. This mitigation is not intended to alleviate the

responsibility of the owner or its agents from contacting the County Coroner and complying with State law if human remains are discovered.

Compliance Actions for Mitigation Measure No. 3:

3a: Prior to the issuance of construction permits from HCD-Building Services, the Applicant/Owner shall include a note on the construction plans encompassing the language contained in Mitigation Measure No. 3, including all compliance actions. The Applicant/Owner shall submit said plans to HCD-Planning for review and approval.

3b: Prior to the issuance of construction permits from HCD-Building Services, the Applicant/Owner shall submit evidence to the satisfaction of the Chief of HCD-Planning that a monitor traditionally and culturally affiliated with the vicinity of the subject parcel and that has consulted with the County and designated one lead contact person in accordance with AB 52 requirements, or other appropriately NAHC-recognized representative, has been retained to monitor the appropriate construction activities. This Tribal Monitor shall be retained for the duration of any project-related grading associated with the installation of utilities and cut up to 5 feet deep.

3c: Any artifacts found that are not associated with a finding of human remains shall be cataloged by both the Tribal Monitor and the qualified archaeological monitor. Once cataloged, the qualified archaeological monitor will take temporary possession of the artifacts for testing and reporting purposes. Upon completion of these testing and reporting activities, all artifacts, at the discretion of the Property Owner, shall be returned within one (1) year to a representative of the appropriate local tribe as recognized by the Native American Heritage Commission, or the Monterey County Historical Society. A final technical report containing the results of all analyses shall be completed within one year following completion of the fieldwork. This report shall be submitted to HCD-Planning and the Northwest Regional Information Center at Sonoma State University prior to final of construction permits. Artifacts associated with a finding of human remains shall be reburied in accordance with State Law and the penalty for violation pursuant to PRC section 5097.994.

3d: Prior to final inspection from HCD-Building Services, the Tribal Monitor or other appropriately NAHC-recognized representative shall submit a letter to HCD-Planning confirming participation in the monitoring and provide a summary of archaeological and /or cultural finds or no finds, as applicable.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source: 1, 2, 3, 4, 5, 6, 23, 28)	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple years? (Source: 1, 2, 3, 4, 5, 6, 23, 28, 29)	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Source: 1, 2, 3, 4, 5, 6, 23, 24)	☐	☐	☒	☐
d) 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? (Source: 1, 2, 3, 4, 6, 25)	☐	☐	☒	☐
e) Comply with federal, state, and local statutes and regulations related to solid waste? (Source: 1, 2, 3, 4, 6, 25)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
Adequate utilities and services would be provided for the Proposed Project. Wastewater treatment and sewer service would be provided by the City of Salinas and conveyed to Monterey One Water (M1W) for treatment at its regional facility. Potable water would be provided by Alco Water Service (Alco). Solid waste will be hauled by Waste Management, Inc. of Monterey County. Additionally, natural gas & electricity will be provided by Central Coast Community Energy (3CE) and PG&E.

Utilities and Service Systems (a), (c) and (d) – Less than Significant Impact
An existing City of Salinas sanitary sewer is located immediately northwest of the proposed project site within Sconberg Parkway. The Proposed Project would connect to the existing City of Salinas sewer in Sconberg Parkway via a sewer lateral. An existing Alco water line is also located within Sconberg Parkway. The Proposed Project would connect to the existing Alco water system in Sconberg Parkway via a new lateral pipeline. The Proposed Project includes bio-retention areas to trap stormwater generated on the site. These bio-retention areas would connect to the existing City of Salinas stormwater system located in Sconberg Parkway via two new stormwater laterals. These improvements would require an encroachment permit from the City of Salinas due to work in the public right-of-way. The Proposed Project would not require

additional construction or relocation of utility facilities which would cause significant environmental effects.

Water Service

The Alco Water System has issued a "Can and Will serve" letter indicating that there is adequate capacity and water supply for the Proposed Project (Source: 20). Per the California Green Building Code, typical indoor water demand for residential development is 50 to 55 gallons per day per person (gpd/person). However, due to the seasonal use of the Proposed Project and limited daily use as a result of farmworkers being off-site for a majority of the day, the Water Demand memorandum utilized a demand of 40 gpd/person. This demand was based on data from an existing 75-unit farmworker housing apartment complex located in Boronda, Unincorporated Monterey County. The Proposed Project would construct 45 apartment units and therefore the 40 gpd/person demand is assumed in this analysis. The Proposed Project submitted a Water Demand Assessment (Source: 25) to analyze its proposed water demand against its current and baseline water demand for agricultural operations. Data from the table below was used to determine water supply for the Proposed Project during normal, dry, and multiple years. As detailed in Section IV.11 of this Initial Study, the Proposed Project's water demand (8-month residential use plus year-round maintenance and landscaping) would be 7.7 AFY less than the baseline water use of 20.9 AFY (projected water demand of 13.2 AFY).

Table USS-1, Projected Water Demands by Schaaf & Wheeler (Source: 25)

	Quantity	Unit	Factor	Units	Demand	Units	Convert	Units	Demand	Units
Existing Use										
Row Crops	5.24	Acres	3.98	AFY/acre	20.9	AFY	1	AFY/AFY	20.9	AFY
Proposed Use, Assume 12-month Occupancy										
Residential	361	Beds	40	gpd/bed	14440	gpd	0.00112	gpd/AFY	16.2	AFY
Maintenance Period	0	Month	0.05	AF/month	0.0	AFY	1	AFY/AFY	0.0	AFY
Landscape (turf)	0.16	Acre	3.2	AFY/acre	0.5	AFY	1	AFY/AFY	0.5	AFY
Landscape (non-turf)	0.23	Acre	1.8	AFY/acre	0.4	AFY	1	AFY/AFY	0.4	AFY
Decrease in Water Use Compared to Existing Demand:									3.8	AFY
Post Project Water Use:									17.1	AFY
Proposed Use, Assume 9-month Occupancy										
Residential	361	Beds	40	gpd/bed	14,440	gpd	0.00084	gpd/AFY	12.1	AFY
Maintenance Period	3	Month	0.05	AF/month	0.2	AFY	1	AFY/AFY	0.15	AFY
Landscape (turf)	0.16	Acre	3.2	AFY/acre	0.5	AFY	1	AFY/AFY	0.5	AFY
Landscape (non-turf)	0.23	Acre	1.8	AFY/acre	0.4	AFY	1	AFY/AFY	0.4	AFY
Decrease in Water Use Compared to Existing Demand:									7.7	AFY
Post Project Water Use:									13.2	AFY

As detailed in Section IV.10(b) of this Initial Study, the Proposed Project is located within the Eastside Aquifer Subbasin of the Salinas Valley Groundwater Basin. The Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA) is responsible for managing the Salinas Valley Groundwater Basin. The SVBGSA manages existing and supplemental water supplies in order to

prevent further increase in, and to accomplish continuing reduction of, long-term overdraft and to provide and ensure sufficient water supplies for present and anticipated needs within its boundaries. Implementation of the Proposed Project would result in a net decrease in water use in the Basin of approximately 7.7 to 8.8 AFY assuming occupancy over nine months per year and year-round landscaping and maintenance, when compared to existing conditions. This would be considered consistent with the Groundwater Sustainability Plan's goal of long-term sustainability within the subbasin. Although not proposed, if the Project was occupied 12 months per year, the total water demand projected water use under a residential complex would be 17.1 AFY, which is a 3.8 AFY decrease over the existing agricultural water use on the Project site.

The Proposed Project would have a less than significant impact related to sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Wastewater Treatment

Schaaf & Wheeler prepared a preliminary sewer capacity assessment. The Proposed Project would construct high-occupancy units with a maximum occupancy per room of 8 persons. The proposed maximum occupancy is 361 beds. Assuming 70 gallons/persons/day (based on the City of Salinas Sanitary Sewer System Master Plan), 361 persons would generate an average of 25,270 gpd. The 16 existing dwelling units adjacent to the Proposed Project have an estimate of 60 occupants. Adding those, the total population would be 421 persons, resulting in a total estimated flow generated of 29,470 gpd.

The City of Salinas maintains 292 miles of sanitary sewer collection system pipeline, which vary in diameter from 6- inch to 54-inches, and 11 sanitary sewer lift stations. The City's Wastewater Division of the Public Works Department is responsible for the operation and maintenance of the city's sanitary sewer collection system. The City has issued a conditional "Can-and-Will-Serve" Letter for the Proposed Project (Source: 32), which includes connecting the proposed three apartment buildings and 16 existing apartment buildings to the City's sewer system. Service conditions include obtaining encroachment permits from the City of Salinas and County of Monterey to allow installation of the needed sewer line connection. The Proposed Project would also be required to pay "special sewer fees" assessed at the time of the City of Salinas encroachment permit. Impacts on wastewater service would be less than significant.

Electric and Natural Gas

The Proposed Project would be provided natural gas and electrical service with PG&E and the Central Coast Community Energy (3CE). 3CE is a joint powers authority partnered with PG&E to provide billing, power transmission and distribution services, gird maintenance and natural gas services to Monterey County. For more information on energy breakdown, please see the "Energy" section IV.6 above. Impacts on electricity and natural gas service would be less than significant.

Telecommunications
The Project does not propose, nor would it require the construction or relocation of telecommunications equipment or utilities. Impacts on telecommunications would be less than significant.

Utilities and Service Systems (d) and (e) – Less than Significant Impact:
Development of the Proposed Project would increase the need for solid waste disposal, to be served by a landfill with sufficient permitted capacity to accommodate the Proposed Project's disposal needs. Solid waste disposal for the Proposed Project would be provided by Waste Management, under the management of Salinas Valley Solid Waste Authority. The Proposed Project would include the installation of infrastructure to accommodate the generated waste. The Project received a "Will-Serve" letter from Waste Management to provide weekly collection services of trash, recyclables, and organic waste. Monterey County is served by two active solid waste landfills, Johnson Canyon Sanitary Landfill, located at 31400 Johnson Canyon Road in Gonzales, and Monterey Peninsula Landfill, located at 14201 Del Monte Boulevard in Marina. Both facilities may serve the Proposed Project. Johnson Canyon Sanitary Landfill has an estimated six million cubic yards of remaining capacity (Source: 22) until the year 2055. Monterey Peninsula Landfill has an estimated 48.5 million cubic yards of remaining capacity and is expected to reach full capacity in 2107.

Solid waste generated by the Proposed Project would include food and other waste from on-site residents and employees. Waste disposal to landfills would be minimized, and all waste would be properly disposed of in a safe, appropriate, and lawful manner in compliance with all applicable regulations of local (Monterey County's Integrated Waste Management Plan), state (California Integrated Waste Management Act of 1989 & California Green Building Standards), and federal regulations related to solid waste. Since the Proposed Project would require compliance with all County, state, and federal regulations and conditions, there would be no violation of the regulations concerning solid waste disposal as conditions for approval, resulting in a less-than-significant impact.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan? (Source: 1, 2, 3, 4, 5, 6, 26, 37)	☐	☐	☐	☒
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? (Source: 1, 2, 3, 4, 5, 6, 26, 37)	☐	☐	☐	☒

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source: 1, 2, 3, 4, 5, 6, 26, 37)	☐	☐	☐	☒
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? (Source: 1, 2, 3, 4, 5, 6, 26, 37)	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
Please refer to Section IV.A Environmental Factors Potentially Affected. The Proposed Project would have no impact on wildfires.

VII. MANDATORY FINDINGS OF SIGNIFICANCE

NOTE: If there are significant environmental impacts which cannot be mitigated and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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? (Sources:1-37)	☐	☒	☐	☐
b) Have impacts that are individually limited, but cumulatively considerable? (Source: 1-37) ("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)? (Sources: 1-37)	☐	☐	☒	☐

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (Source: 1-37)	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
Pursuant to Section 21083 of the Public Resources Code and Section 15065 of the CEQA Guidelines, a project would be considered to have a significant effect on the environment, and an Environmental Impact Report shall be prepared, if impacts identified cannot be avoided or mitigated to a point where no significant effect on the environment would occur. The analysis provided in this Initial Study found that there is no substantial evidence, in light of the whole record, that the Proposed Project would have a significant effect on the environment.

Mandatory Findings of Significance (a) – Less Than Significant Impact with Mitigation
Based on the analysis provided in this Initial Study, the Proposed Project would not 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. The Project site does not contain any historic resources and thus, would not eliminate important examples of the major periods of California's history. Finally, mitigation measures are identified to avoid potential disturbance to buried archaeological and tribal resources during construction. Based on the analysis, the project would have no impact on mineral resources. Mitigation Measure No. 1 was incorporated to reduce impacts on a special status wildlife species, see Section IV.4 above. Implementation of this mitigation would reduce potential impacts to biological resources to a less than significant impact. The project would have the potential to impact cultural and tribal cultural resources, see Sections IV.5 and 18 above. Mitigation Measures Nos. 2 and 3 have been incorporated to require the retention of an on-call archaeological monitor and an on-site tribal monitor to be present for excavation. Implementation of these mitigations would reduce potential impacts on cultural and tribal cultural resources resources to a less than significant impact.

Mandatory Findings of Significance (b) – Less Than Significant Impact
As discussed in this Initial Study, the project would have no impact, a less than significant impact, or a less than significant impact after mitigation with respect to all environmental issues. No development is proposed within the Proposed Project vicinity that would contribute to cumulative impacts. While the Proposed Project's development could result in minor impacts which inherently contribute to cumulative impacts in some instances, it would not result in substantial long-term environmental impacts and, therefore, would not contribute to cumulative environmental changes that may occur due to planned and pending development. The air quality evaluation considered cumulative effects based on the MBARD thresholds and found those to be less than significant. Furthermore, payment of the required traffic fees identified in this Initial Study would reduce all project impacts to a less-than-significant level. Therefore, the proposed project would not significantly contribute to cumulative impacts.

VII(c): Less than Significant Impact

Effects on human beings are generally associated with impacts related to issue areas such as aesthetics, air quality, geology and soils, noise, hazards and hazardous materials, traffic, and wildfire. As discussed in Section IV.A, *Factors* and Section VI., *Environmental Checklist*, of this Initial Study, the Proposed Project would have no impacts or less than significant impacts related to aesthetics, air quality, geology and soils, noise, hazards and hazardous materials, traffic, and wildfire. Therefore, as proposed and analyzed in this Initial Study, the project would not cause substantial adverse effects on human beings, either directly or indirectly.

VIII. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE ENVIRONMENTAL DOCUMENT FEES

Assessment of Fee:

The State Legislature, through the enactment of Senate Bill (SB) 1535, revoked the authority of lead agencies to determine that a project subject to CEQA review had a "de minimis" (minimal) effect on fish and wildlife resources under the jurisdiction of the California Department of Fish and Wildlife. Projects that were determined to have a "de minimis" effect were exempt from payment of the filing fees.

SB 1535 has eliminated the provision for a determination of "de minimis" effect by the lead agency; consequently, all land development projects that are subject to environmental review are now subject to the filing fees, unless the California Department of Fish and Wildlife determines that the project will have no effect on fish and wildlife resources.

To be considered for determination of "no effect" on fish and wildlife resources, development applicants must submit a form requesting such determination to the California Department of Fish and Wildlife. A No Effect Determination form may be obtained by contacting the Department by telephone at (916) 653-4875 or through the Department's website at www.wildlife.ca.gov.

Conclusion: The project will be required to pay the fee.

Evidence: Based on the record as a whole as embodied in the HCD-Planning files pertaining to PLN230035 and the attached Initial Study / Proposed Mitigated Negative Declaration.

IX. SOURCES

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